Understanding the Role of Recreational Vehicles and Park Model Trailers as an Alternative Housing Option and the Barriers to their Use

By

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A practicum submitted to the Faculty of Graduate Studies in partial fulfillment of the requirements for the

DEGREE OF MASTERS OF CITY PLANNING

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Defense Date: December 13, 2006

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ABSTRACT

This practicum investigates the use of recreational vehicles and park model trailers within the east central Vancouver Island area with the objective of developing an understanding of their use as an alternative affordable housing option.

As part of this research, and in order to provide a base reference point for a later analysis within the study, a review of literature on the topics of homelessness, evolution of the travel trailer, mobile home policy, living in an RV on the street, living in an RV park, and the emergency use of travel trailers was conducted.

In addition, this research includes a review of Provincial regulations such as the BC Building Code, Residential Tenancy Policy Guideline how they relate to the use of RV and park model trailers. As well, this study includes a review and analysis of the zoning bylaw of various local governments on Vancouver Island with respect to the use and classification of RV and park model trailers.

This practicum forms a case study of local government officials, campground operators and recreational vehicle dwellers on the use of RVs and park model trailers within the study area.

With respect to local governments, survey interviews were conducted with Staff to gain an understanding of the classifications systems used by local authorities and to gage their
level of familiarity and understanding of manufactured accommodations. As well, a survey of Campgrounds and RV parks were conducted looking at indicators for long-term stay opportunities for RV and park model trailers. In addition, past and present RV and park model trailer dwellers were also interviewed provided insight on the reasons why people live in a recreational vehicle or park model trailers.
ACKNOWLEDGEMENTS

I would like to sincerely thank Dr. Ian Skelton for your continued patients and belief in me. Without your guidance as my advisor this would not have been possible. I would also like to generously thank the members of my committee Mr. Tom Yauk and Ms. Brigid Reynolds for your time, dedication, and input.

To Ms. Gayle Jackson and Ms. Pamela Shaw and my colleges, I would like to thank-you for your kind support while I have been on this academic journey. To Dr. Larry McCann, I would like to thank-you for helping me discover a keen interest in the urban form.

Finally, I would like to thank my friends and family, especially my parents Bill and Sandy Russell for your tireless support. To my daughter Kaylie, I would like to thank-you for your love and understanding while I have been working on all this.
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1.0 INTRODUCTION

Everyone at some point evaluates their shelter options with a desire to improve either the quality or affordability of their choice. In evaluating my own housing needs I began to look for an independent and affordable option. This desire to find an affordable housing option led me to consider recreational vehicles and park model trailers. While I have determined for myself that I am presently not in a position to undertake such a move, in the process of exploring this housing option, I became interested in the broader use of recreational vehicles (RVs) and park model trailers, from a planning perspective, as an alternative means of affordable housing.

1.1 GOALS AND OBJECTIVES

The aims of this research are to develop an understanding of the use of recreational vehicles and park model trailers as an alternative affordable housing option, to understand the reasons why individuals have made the choice to use this option, and to examine the barriers imposed, as well as those opportunities afforded, by local governments. In addition, as there is very little written on recreational vehicles (RVs) and park model trailers, it is an objective of this practicum to begin to fill this knowledge gap. This practicum focuses on the use of RVs and park model trailers as a housing option on Vancouver Island. This region has been selected because of the mild nature of the local climate, where in a Canadian context, year round RV living is both possible and
quite probable. In addition, I am very familiar with this area as a long time resident. The applicability of the results to other areas will be considered as part of this study.

This practicum attempts to answer a number of questions:

◊ To what extent are recreational vehicles and park model trailers being utilized as a residence on either a temporary or full-time basis?

◊ What are the reasons and/or circumstances under which individuals have made this housing choice? And are there cultural associations?

◊ What are the challenges and opportunities for individuals who reside in RV and park model trailers?

◊ What are the official positions of various local governments on Vancouver Island with respect to year-round accommodation in recreational vehicles and park model trailers?

◊ To what extent are local governments allowing recreational vehicles and park model trailers to be used for residential purposes? Is there a difference between official policy and practice?

◊ Where bylaws have been relaxed to allow full-time occupancy of recreational vehicles and park model trailers what have been the consequences?
1.2 METHODOLOGY

The selection of a research method was challenging, in the absence of understanding the phenomenon that one has yet to fully investigate. The first task was to identify methodologies best suited to gaining knowledge about the subject matter, in this case a study of the use of recreational vehicles and park model trailers as a form of housing.

With respect to this research, a number of pre-existing factors have influenced what methods were most suitable and practical. A major challenge relates to the paucity of academic literature, or statistical information, on the subject of recreational vehicles as a form of alternative housing. The lack of existing research made the quantitative approach unsuitable. In addition, the small number of survey participants from a diverse heterogeneous group would not be conducive to quantitative methods.

This practicum principally uses a qualitative approach using a phenomenological study method, in which an understanding of the human experience is achieved through an examination of the detailed descriptions of the lived experience of the people being studied (Creswell, 1994, p. 12). The data was principally gained through one-on-one interviews.

The interviews were conducted using the semi-standardized interview technique. The semi-standardized technique uses both a structured questionnaire and open discussion format (Berg, 2001, p. 70). The standardized interview is noted as being effective when
limited by time constraints or the opportunity for repeat interviews (Berg, 2001, p. 70). In addition, the technique allows the interview to have some flexibility when the unanticipated is encountered. The semi-standardized interview method does this by allowing for both predetermined questions and live questioning. (Berg, 2001, p. 70)

The sampling method initially consisted of a convenience sample using local government officials and already-known present and former park model trailer and recreational vehicle dwellers. This same method was also used to try to sample local RV campground managers, however this later proved unviable. A convenience sample, according to Berg (2001), uses those individuals who are close at hand and are part of the group or phenomenon that is being researched (Berg, 2001, p. 32). It was originally planned that contacts with RV park operators would lead to contact with RV and park model trailer residence or other individuals who were suitable interview subjects in what is called a “snowball sampling technique,” by Berg (Berg, 2001, p. 33) however, this never reached fruition.

The final research method consisted of an initial survey and an open discussion component. The opportunity for open discussion was afforded interview subjects so that additional insight beyond the scope of predefined survey questions could be gained. Literature review of journal articles, books, newspapers and web media articles on the subject has been conducted in order to provide a context for subsequent interviews and analysis, looking specifically at:
The classification of factory built accommodation and the basis of this categorization.

Alternative housing and whether or not recreational vehicles and park model trailers have a role.

Local government and provincial policy and the barriers and opportunities associates with recreation vehicles and park model trailers as a housing option.

The origin of regulations that deal with recreational vehicle and park model trailer occupation.

Provincial regulation such as the Building Code, taxation and tenancy right with respect to full-time occupancy of RV and park model trailers.

In order to gain understanding of the above issues and attempt answer the questions asked in Section 1.1 the following methods have been used:

Interview questionnaires were developed to answer some of the aforementioned questions with the remainder answered through literature review. Interviews were conducted with local governments, campground and RV park operators, and RV and park model trailer dwellers. The questionnaire and summary of interview results are included in sections 3.4, 3.6 and 3.8 respectively. Interviews were principally conducted by telephone with one RV dweller interview being conducted in person. The individual interviews were tape-recorded and then transcribed at a later date. The responses contained in the transcriptions were organized into an answer matrix on a per question basis. The interview answer matrixes are included in Appendices B, C, and D. A comparative
analysis was conducted on the answer matrix looking for patterns of similarity and difference.

All local governments within the east Vancouver Island study area, excluding the City of Parksville where I work, were contacted initially to participate in the interview survey on the use of recreational vehicles and park model trailers.

An initial email provided an explanation of the survey and included a copy of the informed consent form. Eleven of the fourteen local governments within the study area participated in the telephone interview. In addition, one clarification question was asked of local government by e-mail. Where available Planning staff was selected as the primary local government interview candidates; however, this was not possible in every case and in two instances Building Inspectors were interviewed instead. Planners were selected as the preferred local government contacts because they have expertise in interpreting and drafting land use bylaws. Where Planners were unavailable, Building Inspectors were selected as effective alternatives because they are also familiar with local land use bylaws as they use them in reviewing building permit applications. The interviews conducted included both municipalities and regional districts, which provided both urban and rural contexts.

The local governments that were included include the Town of Comox, City of Courtenay, Cowichan Valley Regional District, City of Duncan, Town of Ladysmith, Village of Lake Cowichan, District of Lantzville, Regional District of Nanaimo, City of
Nanaimo, District of North Cowichan, and Town of Qualicum Beach. These local governments are jurisdictions of various sizes and forms including a number of medium-sized cities, small towns and rural areas. This region shares a common coastal geography and is generally interconnected in a linear fashion along the Island Highway. The interviews themselves consist of a discussion guided by a questionnaire on the topic of policies and extent of enforcement of RV and park model regulations. Prior to the conducting interviews, a review and analysis of various local government bylaws on Vancouver Island, with respect to the regulation of recreational vehicles, park model trailers, manufactured homes, campgrounds and RV parks was undertaken. *(For study area details please refer to reference map included in Appendix E)*

An effort was made to undertake interviews with RV park and campground operators. Emails were sent to ten different operators explaining the intent of the study along with the informed consent form for their review. The initial email contact was followed up with a telephone call to attempt to initiate an interview. One of the RV parks contacted agreed to participate, two others sent negative emails back, and a fourth RV park initially agreed to participate at a later time but ultimately decided that they were too busy. The remainder did not respond to email or telephone messages. In light of the underwhelming response by RV park and campground operators an alternative research approach was undertaken, that of a web based survey. The web sites of various campgrounds within the study area were reviewed, data was compiled and then analyzed in order to answer the survey questions. It was possible to answer questions related to
rates, terms of use, and length of stay using this method. Some questions were ultimately unanswerable, particularly those that relate to the composition of clientele.

Campgrounds were selected from within the defined geographic area using phone directory listings and internet searches to prepare a selection list. Campgrounds from various locations throughout the region are represented in the web site review; however, not all jurisdictions contain campgrounds or RV parks. Campgrounds and RV parks were randomly selected from the campground list of those campgrounds that have web pages. Those campgrounds or RV parks that indicate that they are only open seasonally were removed from the list and a reselection was made.

As indicated, interviews were conducted with current and former RV and park model trailer dwellers using a guided questionnaire and open discussion format. The intent of the interviews was to gain an understanding of the people, their circumstances, and the reasons for their housing choice. Interview subjects consisted of six individuals from within the geographic area who were known to me prior to this undertaking. There was no direct way to contact unknown campground dwellers without a referral from their campground operator and unfortunately the low operator participation rate made this unfeasible.
1.3 ETHICAL CONSIDERATIONS

The use of RVs for full-time occupancy is contrary to bylaws of many local governments and potentially subject to enforcement action; therefore, the anonymity of those interviewed is of paramount importance, particularly with respect to campground operators and their tenants. In addition, local government interviews benefit when the name of staff remains anonymous, as it protects the individual and provides a greater opportunity for candour. However, anonymity is not maintained with respect to the names of the local government jurisdictions as their only risk is their own regulation. In addition, it is also a benefit to the study to be able to compare different jurisdictions.

In conducting interviews the anonymity has been maintained throughout the project for campgrounds, the campground operator, recreational vehicle and park model residents, and local government staff. All the campgrounds and RV parks have been given nondescript names, such as "RV Park X" and "RV Park Y". Anonymity for campground dwellers was achieved by assigning pseudonyms to all records. With respect to local government interviews, the name of the individual staff person is anonymous; instead they are only refereed to as "staff", identified only by the local government they represent when speaking on record.

Maintaining anonymity is of critical importance in this project. It is clearly understood that failing to do so would be a breach of trust that could potentially put those involved in jeopardy should a local government choose to enforce its bylaws where contravention has
become known. For this reason local government interviews were conducted first in order to further ensure the anonymity of campground operators and recreational vehicle and park model trailer residents.

All interview subjects were informed that they could rescind their consent at any time before, during or after the interview, up until publication. In addition, interview subjects were made aware that they had the option of skipping any question asked and could stop the interview, in its entirety, at any time. This was communicated both verbally and through a signed consent form.

1.4 LIMITATIONS

The practicum is limited, in that interviews have been conducted within a given geographic area. This geographical constraint may limit the applicability of the findings to one specific region. Results are also limited though the number of participants that have been interviewed. Those interviewed do not constitute a statistically significant sample size; therefore, it has not been possible to discover results that can, with any certainty, be applied more broadly. With respect to RV parks and campground operators it proved difficult to get participants and therefore the scope and breadth of input was less than the level sought.

It is also highly improbable that the socio-cultural spectrum of those persons living in recreational vehicles or park model trailers has been represented by those interviewed. It
is likely that those of more modest financial means are under-represented while others may be over-represented.

There also will be limits due to the fact that I work for a local government, in this case the City of Parksville, and therefore I did not seek research participants within this jurisdiction.

The review of land use bylaws has been limited to only those parts Vancouver Island within the selected study area. The bylaw comparison is limited to the definitions section of each zoning bylaw within the geographic area. This is due to the size of most land use bylaws in the 100-200 page range and number reviewed for comparison purposes, in this case seventeen. In addition, journal and media articles have been limited to a North American context of RV living.

It was not feasible to interview people from every campground, resort or RV park on Vancouver Island and therefore these interviews are generally limited to central Vancouver Island.

However, despite these limits this research provides an opportunity to investigate the use of RVs and park model trailers to begin to fill the knowledge gap on this subject. The experiences of local governments and recreational vehicle dwellers, while not necessarily statistically significant in the mathematical sense, are valid experiences none the less where understanding can be gained on the use of recreational vehicles as a form of
accommodation. There is a high likelihood that many aspects of knowledge gained through this study are transferable to other locations that feature a similar climate and regulatory framework. In addition, this study can provide a useful reference for future research on this subject.
2.0 LITERATURE REVIEW

The literature review is broken down into six components: homelessness, evolution of the travel trailer, mobile home policy, living in an RV on the street, living in an RV park, and the emergency use of travel trailers. The first section briefly examines “homelessness” to provide an understanding and a base reference point for a later comparative analysis in relation to RV living. The section that focuses on the evolution of the travel trailer provides an historical context on the development of travel trailers, and mobile homes, providing insight on the similarities they share. The mobile home policy section provides a general context of the type of policies that have affected the use of mobile homes historically in various places. The two literature review sections on living in an RV and the section on emergency use provide a context on the current use of RV and park model trailers as living accommodation. Academic literature on mobile homes, of which is meager but sufficient has been used out of necessity in lieu of the virtually non-existence of writing on recreational vehicles and park model trailers. This sentiment is echoed in a quote by Robert Plunket in an article in Sarasota Magazine: "Trailers and mobile homes have never been considered architecture, and there is very little written about them" (Plunket, 2005, p. 182).

2.1 AFFORDABLE HOUSING AND HOMELESSNESS

This section examines affordable housing and homelessness and provides background information that leads to a contextual framework for the analysis of recreational vehicle
habitation. So, what exactly is “homelessness”? And, how does it relate to living in an RV or park model trailer? According to Axelson and Dail "Homelessness is as old as the first permanent settlement..." (Axelson & Dail, 1988, p. 463).

Homelessness in Canada, according to a definition developed by the Center for Human Settlement in Vancouver in 1987, "…is the absence of a continuing or permanent home over which individuals or family groups have personal control and which provides the essential needs of shelter, privacy and security at an affordable cost, together with ready access to social and economic public services" (Hulchanski, 1987, p. 10).

According to Nanaimo's Working Group on Homelessness Issues, homelessness may be defined in both absolute and relative terms. Absolute homelessness is the case of living without physical shelter, such as living on the streets. Relative homelessness, on the other hand, is where housing is substandard, tenure poorly protected, and affordability may place those on the margins at risk of becoming absolutely homeless themselves (NWGOHI, 2003, p. 7).

As noted by Hulchanski, and demonstrated to some degree in the examples above, there is no one definition of homelessness. Hulchanski asks: "Is the 'Problem' the absolute lack of any shelter, or does it also include relative homelessness, the lack of adequate and affordable housing appropriate to the size and need of the household in a decent environment?" (Hulchanski, 1987, p. 5).
The Canada Mortgage and Housing Corporation (CMHC) provides a common definition of affordability on their affordable housing frequently asked question page as follows: "The cost of adequate shelter should not exceed 30% of household income. Housing which costs less than this is considered affordable. However, consumers, housing providers and advocacy organizations tend to use a broader definition of affordability." (CMHC, 2006 ¶ 5)

Another related concept used by CMHC is that of core housing need which is defined as follows:
"Core housing need refers to households which are unable to afford shelter that meets adequacy, suitability, and affordability norms. The norms have been adjusted over time to reflect the housing expectations of Canadians. Affordability, one of the elements used to determine core housing need, is recognized as a maximum of 30 per cent of the household income spent on shelter." (CMHC, 2006 ¶ 4)

Affordable rent, according to BC Housing "...is defined as costing no more than 30% of a household’s total gross monthly income, subject to a minimum rent that tenants will be asked to pay based on the number of persons living in the home (BC Housing, 2005. According to BC Housing, "to qualify for subsidized housing, the applicant’s gross household income must be below certain income limits" (BC Housing, 2005). BC housing provides a core need income threshold for eligibility for subsidized housing derived from CMHC's annual Rental Market Survey (BC Housing, 2006). For 2003 Core
Need Income Thresholds (CNITS) for the study area ranged between $16,000 to $19,000 for a bachelor suite, $21,000 to $22,500 for a single bedroom and $24,000 to $27,500 for a two bedroom, depending on the municipality (BC Housing, 2006).

According to BC Stats, the average family income in 2000 in the Comox-Strathcona Regional District, including member municipalities, was $57,347 for all census families; $62,446 for husband/wife families and $27,723 for female lone parent families (BC Stats, 2005, RD 25, p. 3). In the Regional District of Nanaimo and member municipalities the average family income in 2000 was $56,464 for all census families; $61,076 for husband/wife families and $29,366 for female lone parent families (BC Stats, 2005, RD 21, p. 3). In the Cowichan Valley Regional District and member municipalities the average family income in 2000 was $57,803 for all census families; $62,945 for husband/wife families and $27,740 for female lone parent families (BC Stats, 2005, RD 19, p. 3). The income levels in all three central Vancouver Island regional districts in 2000 was below the provincial average of $64,821 for all census families; $70,033 for husband/wife families and $33,829 for female lone parent families (BC Stats, 2005, RD 19, p. 3) (BC Stats, 2005, RD 21, p. 3) (BC Stats, 2005, RD 25, p. 3).

Those households within the study area paying 30% or more of their income on housing costs in 2001 are as follows: Comox-Strathcona Regional District 23.9% (BC Stats, 2005, RD 25, p. 3). Regional District of Nanaimo 27.3% (BC Stats, 2005, RD 21, p. 3) and Cowichan Valley Regional District 24.9% (BC Stats, 2005, RD 19, p. 3). A smaller percentage of households within the study area pay 30% or more of their income on
housing costs when compared to the provincial average of 28.6% (BC Stats, 2005, RD 19, p. 3) (BC Stats, 2005, RD 21, p. 3) (BC Stats, 2005, RD 25, p. 3).

Monthly rates for housing in 2001 within the Comox-Strathcona Regional District were $621 for tenants and $697 for owners (BC Stats, 2005, RD 25, p. 3). Within the Regional District of Nanaimo the monthly housing rates were $645 for tenants and $719 for owners (BC Stats, 2005, RD 21, p. 3). Within the Cowichan Valley Regional District the monthly housing rates were $621 for tenants and $718 for owners (BC Stats, 2005, RD 19, p. 3). All three Regional Districts, including their member municipalities, had lower household rents compared to the provincial average rates of $750 for tenants and $904 for owners (BC Stats, 2005, RD 19, p. 3).

In the case of Nanaimo, it has been acknowledged by the provincial government as one of five communities in BC, outside of greater Vancouver, that has been experiencing increasing homelessness (NWGOHI, 2003, p. 9). Absolute homelessness in Nanaimo, for example, has been estimated to range from between 25 to 75 persons throughout the year. Overall, however, relative homelessness has been considered an even greater concern due to a number of indicators such as generational poverty, structural and transitional problems in the local and regional economy, creating conditions that make homelessness and inadequate housing more likely in Nanaimo than in the average BC community (NWGOHI, 2003, p. 9) or other communities within the study area.
Recently the homeless issue in Nanaimo has become more visible both in the media and politically, which does not appear to be the case in other communities included in this study. On the front page of the October 19, 2006 edition of the Nanaimo News Bulletin a headline reads "Homeless need more help, says city MLA" (Wright, 2006). Nanaimo NDP MLA Leonard Krog is cited in the article as saying that too little is being done to help the City's homeless (Wright, 2006, ¶ 1). According to the article homeless numbers are roughly double last winter’s at approximately 300 persons in Nanaimo (Wright, 2006, ¶ 6). City of Nanaimo Social Planner John Horn indicates that programs for mental health and addiction will make the biggest difference in Nanaimo (Wright, 2006, ¶ 7) as these are two of the biggest reasons for homelessness in the City (Wright, 2006, ¶ 8). However, some neighbourhoods in Nanaimo appear to be feeling overwhelmed by the programs offered to the homeless as is reflected in the title of an article in the April 21, 2006 edition of the Nanaimo Daily News titled "Neighbours: Homeless can go elsewhere". A resident of the downtown Nob Hill neighbourhood and member of the residents association is cited in the article saying "This neighbourhood is already saturated with these types of services…” (Barron, 2006, ¶ 4). The neighbourhood is responding to a service called the Living Room that was trying to relocate temporarily until the new Salvation Army's New Hope Shelter that is under construction is complete, 2006, ¶ 5). While not mentioned in the article, there was a lot of neighbourhood reaction to the Salvation Army facility when it was under consideration for approval a couple years ago.

The question as to whether or not living in an RV or park model trailer constitutes relative homelessness, or a viable affordable housing option, is one of perspective and
choice. While from the perspective of government policy RV and park model trailer living is likely considered a form of relative homelessness or inadequate housing, do the residents of RVs and park model trailers themselves necessarily see their housing solution or choice as such? This is a question that this practicum proposes to explore.

2.2 EVOLUTION OF THE TRAVEL TRAILER AND DEFINITIONS

This section examines the development and divergence from travel trailer to mobile home to manufactured home and the blurring of these distinctions. This provides a context for understanding the emergence of the park model trailer.

The modern travel trailer can be traced back circa 1920s or 30s when it was principally used for recreational purposes. However, as early as the 1930s a growing number of families began to use trailers as a form of affordable housing (Foster, 1980, p. 276). These prewar travel trailer residents included construction and agricultural workers and families of modest means (Foster, 1980, p. 277).

The extent to which travel trailers were used as dwelling units changed dramatically during the Second World War when the recreational vehicle began a new life as temporary housing for the influx of factory workers (Foster, 1980, p. 276 & 280). The lack of conventional housing during World War II allowed trailers to prove that they were a viable housing option (Plunket, 2005, p. 183). Additional legitimacy was given to
trailers as a housing type in the USA when the federal government set up trailers and operated trailer parks in cities where surplus housing was scarce (Foster, 1980, p. 289).

Early on in their history trailers and trailer parks began to take on a negative connotation in public perception (Foster, 1980, p. 276). Trailers were then associated with less desirable segments of society (French & Hadden, 1968, p. 220). Part of the low status attributed to trailer dwellers by broader society has been due to the transient nature mobility affords (Foster, 1980, p. 277). Often the surrounding communities attributed local crimes to trailer dwellers due to their perceptions of them (Foster, 1980, p. 277). Plunket notes that "By 1940, trailer parks had acquired a very unsavory reputation. People were actually living in them, not moving on like they were supposed to" (Plunket, 2005, p. 183). Trailer parks were even considered dens of crime by J. Edgar Hoover, FBI Director (Plunket, 2005, p. 183). A 1936 newspaper quote from Howard V. O'Brien, in the article by Bair, sums up best how surrounding neighborhoods, at the time, perceived trailers: "The trailer is such a new thing that people are not yet armed against it ….. A man may fancy that his home is a castle, but let a trailer appear and his stronghold is like Rome before the Goths." (Bair, 1967, p. 286).

From its inception in the 1930s it was not until after the Second World War, in the middle of the 1950s, that the travel trailer and what is today called a mobile home or manufactured home began to emerge as separate entities (Bair, 1967, p. 287, French & Hadden, 1968, p. 219). As the travel trailer morphed into the manufactured home of today it lost its "otherness" and its alternative culture appeal (Plunket, 2005, p. 183).
the mid-1960s a class of trailers began to morph into something that no longer looked like it moved but instead began to mimic the architectural form of the ranch-style house (Plunket, 2005, p 183).

The divergence between manufactured homes and recreational trailers can be seen in the size increases from the 1940s through to the 1960s for those trailers being used as permanent housing (French & Hadden, 1968, p. 221). The majority of trailers used for wartime housing were 8 feet wide by 22 feet long (Foster, 1980, p. 280). The 8-foot wide, 300 square foot, trailer of the 1950s evolved into the 12-foot wide, 600 square foot, trailer by the 1960s (French & Hadden, 1968, p. 221, Bair, 1967, p. 287). Today, park model trailers, which are manufactured to RV standards as vacation homes, are nearing the 600 square feet of those that were used as permanent dwelling in the 1960s; and, are the same width at 12 feet wide. The typical single-wide manufactured home intended for permanent residency is 14 feet wide and provides approximately 1000 square feet in floor area.

The blurred distinctions between manufactured home and travel trailers has not completely vanished as larger park model trailers, which are built to RV standards for seasonal accommodation, from the outside appear very similar to single-wide manufactured homes.

According to the Canadian Recreational Vehicle Manufactures Association, on their website www.gorving.ca, there are nine types of recreational vehicles. These range from the
folding tent trailer, truck camper, travel trailer, fifth-wheel trailer, class A motor home, class B camper van, class C mini-motor home, park model trailer 102, to the park model recreation unit (CRVA, 2006, What Kind of RV Should I Get).

The park model trailer 102 and the park model recreational unit are very similar in form. The trailer, while designed to be moved infrequently compared to a fifth-wheel or travel trailer, is designed to be moved sometimes by a conventional vehicle (CRVA, 2006, Park Model Trailer 102 ¶ 4) whereas the recreation unit is designed to remain in place and requires highways permits and a special tow vehicle (CRVA, 2006, Park Model Recreational Unit ¶ 1). The maximum floor area of park model trailers and recreation units is set at 400 square feet (CRVA, 2006, Park Model Trailer 102 ¶ 3) and 540 square feet (CRVA, 2006, Park Model Recreational Unit ¶ 4) respectfully, nearing the size of a manufactured home in the 1960 (French & Hadden, 1968, p. 221, Bair, 1967, p. 287) but about half the size of a single wide manufactured home today.

The dilemma of defining what is a mobile home has been an issue since it first evolved from the travel trailer. Is it a building, a vehicle or both (Bair, 1967, p. 290)? As people turn to larger RVs such as park model trailers, this dilemma may still be in some respect unresolved. While from a standards and regulatory perspective there may be clear distinctions, this does not necessarily mean that they are used in practice, or perceived in social terms, as such. It is one of the intention of the practicum is to gain knowledge on these social perceptions and understandings.
2.3 MOBILE HOME POLICY CHALLENGES

This section examines the policy challenges that mobile homes have faced over time in various North American locations and provides a framework in which the current regulations and policies, as they relate to recreational vehicles and park model trailers, may be compared in later sections of this report. As recreational vehicles, especially travel trailers and park model trailers, share a common history with mobile homes and other factory built accommodation there may be similarities in the evolution of their regulation. That being said, as French and Hadden state in their article in 1968, "probably the most significant aspect of mobile homes is that we know so little about them…they have remained relatively invisible" (French & Hadden, 1968, p. 226). However, in the case of RV dwellings, even less may be known.

History and Development

From its humble beginning as an automobile trailer, the RV became a fully appointed dwelling unit in a period of 15 years, thereby becoming a major form of affordable housing (Vernon, 1974, p.159). By the late 1960s there were larger trailers, intended for full time occupancy by their manufacturers (Bair, 1967, p. 288). As Bair noted in 1967, "[t]here is now a clear break between the increasingly immobile mobile home and the recreational vehicle…." (Bair, 1967, p. 303). Progressively, more jurisdictions began to recognize this fact. When a trailer had its wheels removed many jurisdictions no longer considered it a vehicle and instead started to require that it be subject to building code requirements. Exemptions to the building code requirements were, however, granted to
trailers during the war effort, by the U.S. War Productions Board, so that tires could be reused (Foster, 1980, p. 282).

**Land Use Regulations**

When the trailer first began to appear as a housing option, the potential rapid influx of people that this new housing form could facilitate began to concern local government officials, especially with regards to demands on municipal services such as schools and sanitation (Foster, 1980, p. 276). These larger trailers intended for full time occupancy by their manufacturers were still codified by various regulatory regimes as travel trailers (Bair, 1967, p. 288). Outdated regulations, particularly with respect to land use, were in part attributed to the fact that many early mobile home parks started as travel trailer parks and simply evolved over time (Bair, 1967, p. 293). Bair concludes that in order to improve the regulation with respect to manufactured (mobile) homes, a clearer distinction had to be made between manufactured homes and travel trailers (Bair, 1967, p. 292). In addition, failure to distinguish between manufactured homes and travel trailers results in regulations requiring inappropriate services for a given use; for example, a manufactured home park does not require community washrooms or showers, and is less likely to require a laundromat, whereas at a travel trailer park these would be considered necessities (Bair, 1967, p. 294). Some jurisdictions in the 1960s began to allow mobile homes in residential neighbourhoods, provided that the wheels were removed, and that the trailers met appropriate electrical, plumbing and heating standards (Bair, 1967, p. 298). Other jurisdictions went further, requiring that the siding and roof pitch met a
minimum standard, and some places limited manufactured homes to trailer parks only (Bair, 1967, p. 299).

**Taxation**

Communities were concerned that the demand on services would be greater than what they considered to be “their fair share” (Yale Law Journal, 1962, p. 711) and that the mobile residents would not be taxed proportionately to pay for services they used (Foster, 1980, p. 277). With regard to taxation, the trailer has always been fraught with debate as to whether it is real estate, vehicle, or personal property (Bair, 1967, p. 300). Issues of taxation appear to be a main concern of local governments, especially where trailers are being used as full time residences but are being taxed as vehicles (Yale Law Journal, 1962, p. 704-705). Often state tax [and this appears to apply to provinces] varied from one jurisdiction to the next and varied depending on the circumstance of how the trailer home was sited as to whether or not it was licensed as a vehicle (Bair, 1967, p. 301). In some jurisdictions, such as New York State, mobile homes were taxed as real property regardless of their location (Bair, 1967, p. 301). Bair notes that some states, such a Minnesota, in 1967 still treated mobile homes as vehicles, even requiring that license plates be purchased annually (Bair, 1967, p. 302). For taxation purposes the mobile home, even in the mid-1970s in California, was still requiring vehicle registration fees, license fees and taxes (Vernon, 1974, p. 161). In addition, the tax rate for mobile homes was based on the original full retail price, and not the cost of material used; as would be the case for a traditional dwelling unit, resulting in mobile homes being taxed at a discriminatory rate compared to conventional site-built houses (Vernon, 1974, p. 162).
The Yale Law Journal article concludes, appropriately enough, that where trailers are used for dwellings it is inappropriate to tax them as vehicles as they are functioning as real property or real estate (Yale Law Journal, 1962, p. 712).

**Construction Standards**

Prior to the adoption of a national construction standard for mobile homes in the USA, it was often problematic for local governments to issue the necessary building permit for permanent foundations. In 1975, the United States passed the National Manufactured Home Construction and Safety Standards Act, administered by the Department of Housing and Urban Development (HUD) to create national standards that would facilitate the relocation of factory-built homes, certified to this new standard - often called the "HUD Code", from one jurisdiction to the next (Berdin, 2000, p. 1). In 1972 in Canada, the CSA-Z240 Mobile Home Series of standards became recognized nation-wide, according to the Manufactured Housing Association of British Columbia (MHABC, 2006, History ¶ 6). The provincial Office of Housing and Construction Standards indicates that mobile home and factory-built homes were added to the BC Building Code November 3, 1973 (OHCS, 2006, Table – item 2), the same year that BC adopted the National Building Code (1970) (OHCS, 2006, Table – item 1).

While RVs in Canada are constructed in compliance with Canadian Standards Association (CSA) standards, these are standards particular to RV and park model trailers and are not part of the CSA-Z240 manufactured home (MH) series (MHABC, 2006, History ¶ 6). Therefore, travel trailers, park models, and other RV would not be BC
Building Code or Canadian building code compliant as is further discussed in Section 3.2 - Analysis of Provincial Regulations. As RVs do not meet BC building code they could not legally be occupied as a conventional dwelling unit under the code.

2.4 LIVING IN RVs ON THE STREET

This section seeks to gain understanding of the circumstances of those who live in RVs in precarious circumstances on the street. In some places RV dwellers are deciding to living in the streets in stead of in RV parks. In such diverse places as Marin County and Santa Monica in California, Telluride in Colorado, and New York City, accounts of street-side RV dwellers appear in many local newspaper articles across the United States.

In Marin County, California, a newspaper had interviewed three people who lived in recreational vehicles on the streets of the county. All three, at the time of the interview, were working full-time and in their fifties, were white and had adult children (Bradley, 2002, Other homeless people section, ¶ 2). Due to the lack of affordable housing they saw few options (Bradley, 2002, Other homeless people section, ¶ 1). In this case little was known of the number of persons living in cars, vans and RVs but it is often estimated that many homeless live in vehicles (Bradley, 2002, Statistics on Marin's homeless section, ¶ 3). One of the persons interviewed had attributed the high cost of housing as contributing to vehicle living (Bradley, 2002, Other homeless people section, ¶ 2). Even the high cost of campgrounds proved difficult to meet for some (Bradley, 2002, Introduction section, ¶ 4).
In Union City, California, those living in their RV on the side of the street started to receive fines due to city ordinances implemented in 2002 (Reang, 2002, ¶ 5). According to Reang (2002), as housing prices have risen in coastal areas, such as Union City, more and more of the working poor and retired are unable to afford rent and are turning to RV as an option (Reang, 2002, ¶ 12). There is a certain invisibility to suburban homelessness (Reang, 2002, ¶ 14). One young man interviewed could no longer afford his rent, with a $10 an hour income, and after a roommate moved out he decided to use his savings to purchase an RV to live in (Reang, 2002, ¶ 23 & 24).

In Telluride, Colorado after implementing bylaws to prohibit street-side RV parking the City created a parking lot with 20 spaces for RV dwellers. Advocates for the homeless in Telluride estimate that over 116 people need a space. The typical RV dweller is someone who works but is unable to afford housing in the high rent environment (High County News, 1994, ¶ 1).

The lack of empathy to the plight of RV dwelling is typified in a letter to the editor in Santa Monica in April 22, 2001. In this letter we hear from a homeowner frustrated by vehicle camping on public streets. The writer, Donna Block, states: "Our streets should not be used as alternative affordable housing or campgrounds for transients. …This issue needs to be addressed with a solution that will prioritize public safety and the environment"(Block 2001).
Similar negative public reaction by neighbourhood groups in Eugene, Oregon, led the city to back out of a plan to allow RV dwellers to camp on vacant property owned by the local school board (Gray, 1998, ¶ 1). Without sanctioned shelter it has literally become a crime for the homeless to sleep (Gray, 1998, ¶ 3). Complaints from neighbours led to police action and arrests (Grey, 1998, ¶ 3). There are some estimates that hundreds of thousands of people in the United States live in various types of recreational vehicles and automobiles (Gray, 1998, ¶10).

A reporter in New York interviewed a 50 year old man who, due to the high cost of apartment rentals, at $900 a month, was forced to seek out alternatives when he became unemployed (Kilgannon, 2004, ¶ 7). Having to live on $150 a week in unemployment "benefits" (Kilgannon, 2004, ¶ 7) the man decided to purchase an RV with $6000 of his life's savings and now lives in his camper on the streets of New York (Kilgannon, 2004, ¶ 9). A near-by propertied neighbour comments "It takes up a parking space and is a bit of an eyesore, but if the man needs it, I guess it's necessary" (Kilgannon, 2004, ¶ 32).

Locally an elderly Nanaimo couple and their son were in the news facing eviction for living in a travel trailer contrary to City Bylaws (Jantzi, 2006, ¶ 1 & 2). The family was living on an industrial property. Dave Stewart, a Planning Assistant, indicated that the City took enforcement action because it had received a bylaw contravention compliant (Jantzi, 2006, ¶ 9). The property owner argued that the RV met the appropriate CSA standard to be permissible as a caretaker unit on the property (Jantzi, 2006, ¶ 10). The City's Planning Assistant stated that "While the CSA number is the same for recreational
vehicles and mobile homes, the standards are different" (Jantzi, 2006, ¶ 11). The article also indicated that the family was paying $300 a month rent to the property owner.

The uncertainty of transient RV living would appear to fit the definition of relative homelessness. Nonetheless, it should be noted that the perception that persons in this circumstance are homeless does not mean that it can be presupposes that those living in the circumstance necessarily consider themselves as such. There are likely persons living in vehicles, camper vans and trailers on Vancouver Island in similar roadside scenarios, as in the aforementioned articles, although they are very invisible here. While very worthwhile, the invisibility and mobility locally of roadside RV living would make it a very difficult area of study, beyond the scope of this practicum.

2.5 LIVING IN A CAMPGROUND OR RV PARK

This section provides background information about some of the circumstances that surround some of those who live in RV parks on a full-time basis. This topic is also be one of the main focus areas of the study. While there are very few academic articles on RV dwellings; fortunately, there have been a number of newspaper articles, and other miscellaneous publications, over the last few years that have revealed in various communities the phenomenon of the working poor and middle class living full time at RV parks, particularly in the United States. In many cases local development pressure in high growth markets is forcing those of more modest means to seek alternative forms of shelter. In sought-after coastal communities, such as those in California, the influx of
wealthy retirees looking for milder climates has raised housing costs, displacing the local population who can no longer afford the cost of housing.

In Sonoma County, California, a June 13, 2004 newspaper article by Spencer Soper in the Santa Rosa Press Democrat illustrates how recreational vehicle parks have become places of permanent residence for those who can’t afford other alternatives (Soper, June 2004, ¶ 2). At the time of the writing of the article by Soper in 2004 it was estimated that over 500 people were housed in RV parks in Sonoma (Soper, June 2004, ¶ 5). Part of the affordable housing crisis in Sonoma was attributed to the rapid increase in prices for the local housing stock (Soper, June 2004, ¶ 13). For example, in 2004 the cheapest apartments ranged in price from US$600 to US$1000 versus US$400 for a camping space at an RV parks (Soper, June 2004, ¶ 13 & 14). The lower costs at the RV parks create a housing option that the residents, who are typically low wage earners and on fixed incomes, can afford (Soper, June 2004, ¶ 23). A family of three, consisting of a working parent, a caregiver and a child, had lived in a campground in a travel trailer for more than 4 years at the time they were interviewed by Soper. The living situation of the family, while at the campground, did improve in time, as they were able to upgrade their trailer from a small 14 foot model to a much larger 30 foot one (Soper, June 2004, ¶ 20 & 21). While it can be said that there was a modest improvement from the following quote from the father, it is clear that the family is in a financially difficult situation: "If we couldn't live here, I wouldn't be able to feed my kid" (Soper, June 2004, ¶ 22). While attempts have been made by local government to recognize RV dwellers, David Brigode of the Santa Rose Community Action Partnership, who was interviewed by Soper, states:
"There are so many people living this way, it would be nice if we could find a way to accommodate them. Otherwise, we're going to end up with empty campgrounds and a bunch of homeless people" (Soper, June 2004, ¶ 48 & 49).

In some cases non-profit societies are using RV campgrounds to provide housing options for those of modest means. In Santa Barbara, California, an old derelict RV park has been cleaned up by a non-profit organization Peoples Self-Help Housing to provide an affordable housing option for families (Rich, 2004, ¶ 13). One young family of four that had previously been living with extended family, in cramped conditions, in a small single family dwelling unit, is happy to have a place to call their own in the Carpinteria Camper Park operated by People's Self-Help Housing (Rich, 2004, ¶ 9). They have also found a sense of community in the park (Rich, 2004, ¶ 12).

In 2000, recreational vehicles were being used in Santa Barbara, California, by the working poor, the elderly, and the disabled to an ever-increasing degree (Sanchez, 2000, ¶ 3). This trend began to gain the attention of local authorities as increased rental costs forced people out of their homes including, according to Sanchez, the Mayor of nearby City of San Carlos (Sanchez, 2000, ¶ 7). The lack of affordable housing in this drastic case places all residents in jeopardy, as even emergency services personnel are no longer able to afford to live there (Sanchez, 2000, ¶ 11). One bedroom apartments in Santa Barbara in 2000 rented for more $1100 a month with the average housing prices in the $500,000 range (Sanchez, 2000, ¶ 17). The City government had tried to accommodate
RV dwellers but citizen complaints early on put an end to those plans (Sanchez, 2000, ¶ 10).

The middle class is also starting to reside in RVs where local employment booms have made local housing unaffordable and where commuting is not feasible. A newspaper article by Clock entitled "Getting Around the High Cost of Living" details this phenomenon in Washington, DC. In 2005, due to an employment boom in and around Washington DC, affordable homes became scarce and countless skilled workers were opting to live in RV parks on a full time basis, instead (Clock, 2005, ¶ 12 & 7). The employment boom has also created a housing construction boom that has in turn brought in construction workers who need a place to stay, many of whom are also choosing to reside in RVs due to their affordability (Clock, 2005, ¶ 14 & 15). Similar RV living by workers was also noted to have happened during the “dot.com” boom in the 1990s in Silicon Valley (Clock, 2005, ¶ 21).

In some cases hot real estate markets and the development boom are forcing those of modest means out of campgrounds as they become slated for redevelopment. In Myrtle Beach Florida, for example, the redevelopment of RV sites into condominiums could displace over 400 to be in need of housing (Burns, 2005, ¶ 2). Much of the cause of the housing boom is being attributed to retiring baby boomers (Burns, 2005, ¶ 10). In Orange County, California, the City of Garden Grove was preparing to evict over 127 families that live in a local RV park so that the land could be redeveloped (Vu, 2005, ¶ 3). One family has resided at the RV park for over 15 years, living in a 30-foot recreational
vehicle, and is facing the near impossible task of finding suitable housing that they can afford in the $400 to $500 a month range (Vu, 2005, ¶ 1 & 2). In addition, because they have lived in what is considered non-permanent housing, they are not protected under law, as would be rental tenants or manufactured home park residents. (Vu, 2005, ¶ 14).

The phenomenon of new development displacing RV park or mobile home park dwellers is not unique to California or Florida. An RV park resort that functions partially as a mobile home park has been in local Parksville and Qualicum Beach newspapers over the last several months. The resort was known for many years as Costa Lotta and was recently renamed as Qualicum Landing (Spalding, 2005, ¶ 6). According to the newspaper the ownership changed in 2005 with the new owner looking to redevelop the site into a 62 unit resort condominium (Spalding, 2005, ¶ 4). Many of the residents are seniors who chosen to retire at the park (Spalding, 2005, ¶ 3). One couple that was interviewed by the newspaper has been there for 12 years (Spalding, 2005, ¶ 12) and another tenant has been living at the park for 14 years (Spalding, 2005, ¶ 16). According to the newspaper article "there are no lots in the area zoned for manufactured homes" (Spalding, 2005, ¶ 14). More accurately, single family residential lots within Electoral Area 'H' of the Regional District of Nanaimo allow for CSA Z240 MH series mobile homes but there are no existing properties in the area that are zoned as for a multi-tenant mobile home parks. Surrey-Newton MLA Harry Bains tabled a motion on May 4, 2006 to the B.C. Legislature to protect the interests of manufactured home owners (Horner, 2006, ¶ 6). Local MLA for the Alberni-Qualicum riding Scott Fraser indicated that the
motion was intended to address the situation of the Costa Lotta residents but acknowledges that there are other similar situations in the province (Horner, 2006, ¶ 9).

Local resistance to RV dwellers is a recurring theme in many communities. RV dwellers are often seen as an undesirable threat to the social fabric. Areas of Sonoma County, California, for example, that once housed low income people, are experiencing gentrification that is raising the cost of housing beyond the means of those on low and fixed incomes (Lisk, 2004, ¶1). Many of those forced out of conventional housing are turning to campers and vehicles to facilitate their housing needs. Some stay at campgrounds; but, even then, the $525 a month space rental is beyond the means of many (Lisk, 2004, ¶1). Local residents, who can afford housing and suffer from ‘NIMBY-ism’, want the RV dwellers out of their community and are looking for regulations that prohibit sleeping in vehicles, as is done in other jurisdictions (Lisk, 2004, ¶1).

In some communities, concerns arise before an RV use even exists. For example, the Thousand Island Residents Association (TIARA) of Ontario detail, on their web site, their opposition since 1997 to a proposed zoning amendment that would facilitate the use of park model trailers at a near-by campground (TIARA, 1997, Current Issues – KOA Kampground ¶ 1). The residents association is concerned that the trailers will be used for full-time, year round occupancy or near equivalent (TIARA, 1997, Current Issues – KOA Kampground ¶ 19). The proponent, the local KOA campground, indicates that their intent is that it will be used seasonally for 9 months (TIATA, 1997, Current Issues – KOA Kampground ¶14 & 21). The residents association is of the opinion that it will
function as a trailer park, contrary to the local Official Community Plan (TIARA, 1997, Current Issues – KOA Kampground ¶ 11). In another case, residents in the town of Minturn, Colorado, are concerned that a proposed RV campground will be used for affordable housing and not as a resort. The developer is trying to assure the community that the local government will put regulations in place that will limit the duration of stay (Miller, 2004, ¶ 14).

In the case study that follows interviews have be conducted with people who live or have lived in park model trailer or recreational vehicles within the study area. The intent is to gain an understanding of the various backgrounds and circumstances that have led individuals to reside in their RV or park model trailer. The literature would appear to indicate that affordability is one of the main reasons in choosing RV dwelling but that this not the sole factor. It is anticipated that there will be variety of reasons for this housing choice and that there may be differing trends between British Columbia and the sun-belt of the western United States.

2.6 DISASTER RELIEF AND THE USE TRAVEL TRAILERS

Travel trailer and mobile homes are commonly used in the United States gulf state region to provide temporary housing to those who have been displaced in the aftermath of hurricanes. Following hurricane Katrina's landfall in August 29, 2005 (CBC, 4 Sept. 2005, ¶6) the United States Federal Emergency Management Agency or FEMA has been working toward establishing long-term temporary housing in travel trailers, mobile
homes or apartments for those displaced by the storm. As of October 13, 2006 approximately 400,000 persons were still in need of long-term temporary housing (Associated Press, 13 Oct 2006, ¶ 6). While travel trailers and mobile homes provide temporary housing, "Trailer housing is the solution of last resort" stated FEMA spokesperson Jim Homstad (cited in Long, 24 July 2006, The Last Resort).

According to FEMA spokesperson James McIntyre "the [United States] federal government ordered 125,000 campers and mobile homes as housing for hurricane victims. But only about 6,700 are now [as of October 2006] occupied, while more than 9,000 others sit unused at government staging sites in Alabama, Mississippi, Louisiana and Texas" (Associated Press, 13 Oct 2006, ¶ 16).

While travel trailers can and do provide emergency shelter there may be time when they are not enough. In prepared remarks made to the U.S. Senate Committee on Homeland Security and Governmental Affairs meeting of February 2, 2006 Mississippi Governor Haley Barbour had the following to say on FEMA's use of travel trailers as part of the hurricane Katrina recovery effort.

"The first recommendation I make to you, FEMA and others seeking to learn the lessons from this catastrophe is the temporary housing solution of installing travel trailers is insufficient for disasters of this magnitude. FEMA and its contractor Bechtel have installed more than 34,000 travel trailers and mobile homes that
serve as temporary housing for about 100,000 Mississippians. Even with the fastest pace of delivery and installation ever, and that has been the case in Mississippi over the last five months, not enough people can get temporary housing fast enough with this single solution" (Barbour, 2 Feb 2006 ¶ 5).

Governor Haley further goes on to state:

"...[There] are existing alternatives, and more can and should be developed. The current near-sole reliance on travel trailers is inadequate for meeting a huge need such as Katrina created" (Barbour, 2 Feb 2006 ¶ 6).

There is also the aspect of appropriate approvals and general red tape associated with temporary emergency accommodations. According to FEMA in an information release dated August 1st, 2004 "Before anyone can move into a travel trailer or mobile home, FEMA must make sure the following guidelines are met: Local zoning and building codes, occupancy permits, environmental rules and other restrictions must be respected… sites selected usually must be outside of the floodplain, have functional water, sewer and electrical utilities and be inspected by local and state authorities" (FEMA, 1 Aug. 2004, Release No.1539-078 ¶ 7).

In Biloxi and Gulfport Mississippi, for example, local authorities indicated that they do not wish to have temporary housing around for longer than is necessary (Thompson, December 2005, ¶ 1). Often local and state officials disfavour the use of single-wide
mobile homes after hurricanes (Thompson, December 2005, ¶ 15). There appear to be concerns that temporary accommodations will overstay their welcome. A single-wide mobile home, which is manufactured to be a full-time dwelling, might express a greater sense of permanence compared to a travel trailer. As stated by George Carbo, Gulfport's Director of Urban Development (cited in Thompson, December 2005, ¶ 18) "Mobile home parks that were created after [hurricane] Camille are still in existence," and "That was something that we wanted to avoid."

Even with the temporary perceptions generally associated with travel trailers, local governments in the gulf region appear to be concerned that they will be around for too long. To ensure that travel trailers only provide housing on a temporary basis cities, such as Biloxi, have implemented system of renewable permits with a maximum stay of eighteen months (Thompson, December 2005, ¶ 36).

In earthquake prone regions such as Vancouver Island, where many persons may be rendered homeless after a major seismic event, the use of travel trailers and other prefabricated structures may prove important in providing emergency housing. In search of Provincial Emergency Preparedness documents there does not appear to be any reference to the use of travel trailers for emergency housing.
3.0 CASE STUDY

The case study consists of the review and analysis of provincial regulations and local
government zoning bylaws as they relate to the use of park model trailers and recreational
vehicles for long term stay. In addition, within the east Vancouver Island study area
surveys were conducted with local government representatives and RV and park model
dwellers. As well an analysis of campground and RV web sites within the study area was
conducted.

3.1 PROVINCIAL REGULATIONS AND THEIR IMPACT ON RECREATIONAL
VEHICLES

The 2006 British Columbia Building Code under Division A Part 1 Section 1.1.1.1.2) g)
exempts manufactured homes meeting Canadian Standards Association standard A277
and CSA0Z250 MH Series standards. The building code states:

"2) This Code does not apply to: …g) factory build housing and components
certified by a Standard Council of Canada accredited agency, prior to placement
on the site, as complying with Canadian Standards Association Standard A277,
"Procedure for Certification of Factory Built Houses," or CAN/CSA-Z240 MH
Series, "Mobile Homes," but this exemption does not extend to on site
preparations (foundations, basements, mountings), interconnections of modules,
connection to services and installation of appliances " (British Columbia Building Code 2006, 2006, Division A Part 1 Section 1.1.1.1.2) g)).

BC Assessment is the Provincial agency responsible for assigning value to property for taxation purposes. The Assessment authority publishes a fact sheet entitled "Factsheet – Assessment of Manufactured Homes that provides an explanation on how "manufactured homes and prefabricated structures are subject to assessment for taxation purposes under the Manufactured Home Tax Act of British Columbia".

While most of the content pertains to mobile homes, there is also some mention made with respect to the use of recreational vehicles. Specifically, in a section explaining exemptions it states: "Assessment and Taxation unusually do not apply to: …recreational vehicles occupied by a tourist and situated in a manufactured home park for less than 60 days (e.g., campers, motor homes and trailers that are not used as a principal residence)" (BC Assessment, 2005, ¶ 8).

However if taxation is applicable and where the structure is located on a rented pad then it appears that it would be based only on the value of the structure and related improvements (BC Assessment, 2005, ¶ 4) and that the value of the land would be assessed to the mobile home park owner (BC Assessment, 2005, ¶ 5).

British Columbia "Residential Tenancy Policy Guideline" has a section that addresses the tenancy of travel trailer and recreational vehicles. It states:
"If the residential premises consist of a travel trailer or a recreational vehicle in a recreational vehicle park, the agreement between the parties may well be included in the Residential Tenancy Act if they meet the requirements of section 2. Each case will turn on its particular circumstances and it is possible that the relationship is not a tenancy and not included in the *Residential Tenancy Act* or the *Manufactured Home Park Tenancy Act* (see Guideline 9)" (RTO, 2004, p. 27-3).

Guideline 9 – Tenancy Agreements and Licenses to Occupy provides the requirements that have to be met in order to demonstrate tenancy and thus protection under the Act. The guideline places the onus on the party invoking the Act to show that a tenancy agreement exists (RTO, 2004, p. 9-2). It also indicates that there are factors that may be used to determine that no tenancy agreement is in place. Some of the factors include things such as that the unit itself is intended for recreational purposes, that it is located in a campground or RV park and not a manufactured home park, and that visiting hours are imposed (RTO, 2004, p. 9-2).

### 3.2 ANALYSIS OF PROVINCIAL REGULATIONS

With respect to the BC Building Code, all buildings within the Province must be constructed in accordance with the Code. The code does however exempt factory certified CSA A277 modular and CSA-Z240 MH Series mobile homes (British Columbia Building Code 2006, 2006, Division A Part 1 Section 1.1.1.1.2) g)) from the building
code because they are seen as equivalents. The question is where does this leave CSA-Z241 park model trailers? Recreational vehicles and park model trailer 102 that are built to the CSA-Z240 RV Series standards would be exempt form the building code because they retain their wheels and are licensable and thus would presumably fall under the Motor Vehicle Act. But as mentioned earlier, the park model Z241 recreation unit is designed to remain in place and requires highways permits and a special tow vehicle to be moved; therefore it would not likely be considered a vehicle (CRVA, 2006, Park Model Recreational Unit ¶ 1). The CSA-Z241 park model would, as building, be subject to the BC Building Code; however, only factory built buildings built to CSA-A277 and CSA-Z240 are exempt from the code (British Columbia Building Code 2006, 2006, Division A Part 1 Section 1.1.1.1.2) g)). As it is a factory built unit, short of disassembling it there is no way that its construction could be easily inspected to ensure compliance with the BC Building Code.

The CSA Z240 RV series and CSA Z241 Park Model Recreation Unit standards, according to the Canadian Recreational Vehicles Association, address electrical, gas, plumbing, appliance systems and vehicular safety (CRVA, 2006, CRVA and CSA Twin Seals of Excellence, ¶ 1). In addition, the Canadian Manufactured Housing Institute in their brochure "A Mark of Distinction CSA" explain, that the CSA mark signifies that a factory build home is designed and constructed to meet local building code as well as electrical and plumbing system codes and regulations (CMHI, 2006, ¶ 2). The specific standards that various factory built accommodation are manufactured to differ by type but
clearly there are CSA standards to ensure safe accommodation in both factory build
buildings and vehicles.

With respect to taxation it appear that a recreational vehicle is only considered a dwelling
if it is occupied more that 60 days (BC Assessment, 2005, ¶ 8 ) for then for taxation
purposes it would be subject to tax assessment for the value of the unit (BC Assessment,
2005, ¶ 8).

The "Residential Tenancy Policy Guideline" indicates that under both the Residential
Tenancy Act and the Manufactured Home Park Tenancy Act (RTO, 2004, p. 27-3) that
there are many criteria that can be used to show that a recreational vehicle does not
demonstrate that it is eligible for protection under the Act (RTO, 2004, p. 9-2). It would
appear that a full-time RV or park model trailer dweller would have few rights of
protection from eviction. For recreational vehicles that are prepared for mobility this is
likely less of an issue because it would involve just driving away, but for park model
trailers that are more permanently affixed it may create undue hardship.

3.3 LOCAL GOVERNMENT BYLAW REVIEW AND ANALYSIS

This section examines the zoning bylaw definitions of various local governments on
Vancouver Island with respect to RV and park model trailer use. It is the intention of this
section to gain an understanding of how RV and park model trailers are classified by the
various local governments within the study area. The definition of the various forms of
factory built accommodation provides information on the scope of each and how they relate to one another. A comparison was made among the bylaw definitions of thirteen local governments and three regional districts on eastern Vancouver Island. The bylaws of the following jurisdictions were reviewed: Cowichan Valley Regional District, Regional District of Comox-Stratcona, Regional District of Nanaimo, District of Campbell River, Town of Comox, City of Courtenay, Village of Cumberland, City of Duncan, Town of Ladysmith, Village of Lake Cowichan, District of Lantzville, City of Nanaimo, District of North Cowichan, City of Parksville, and the Town of Qualicum Beach. *(Please refer to reference map included in Appendix E.)*

Definitions reviewed include dwelling unit, park model trailer, mobile home, recreational vehicle, campground and RV park and in some cases additional bylaw variants.

A very typical customary definition of a dwelling unit can be found in an example from the Regional District of Nanaimo's Land Use and Subdivision bylaw No. 500, 1987. In this definition dwelling unit means "one self-contained unit contained within common walls with a separate entrance intended for year-round occupancy and the principal use of such dwelling unit is residential with complete living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation" (RDN, 1987, p. 2-5). Other local governments within the study area tend to build upon this very typical wording to more specifically define what a dwelling unit is and what it is not.
Some local governments, such as the Town of Comox expand on the typical dwelling unit definition by adding an exclusion to the wording, such as "Dwelling unit …does not include a mobile home" (Comox, 2006, p. 7). Other local governments go even further in the range of their exclusions. In the Town of Qualicum Beach, for example, the definition adds the following exclusions to the typical dwelling unit definition as follows: "Dwelling unit….excludes a mobile home; recreational vehicle or tent" (Qualicum Beach, 1999, p. 12).

It is surprising that in Comox and Qualicum Beach mobile homes are excluded from being a type of permanent single family dwelling, given that they are used as such and appear to be so recognized in most bylaws within the study area and in the BC Building Code (British Columbia Building Code 2006, 2006, Division A Part 1 Section 1.1.1.1.2) g)). The only section of the British Columbia Local Government Act that I am aware of which allows a local government to regulate the form and character of development is through the development permit process, as authority is granted pursuant to Part 26 - Division 9 Section 919.1 of the Local Government. However, Section 919.1 does not appear to provide this authority to local governments with respect to the regulation of the form and character of single family residential lots. Part 26 - Division 9 Section 903, the section of the Local Government Act that allows a local government to create zoning bylaws, also does not appear to provide the authority to regulate the style of a single family dwelling unit or where and how it was manufactured. That being said Section 903 (c)(iii) does allow local governments to regulate the size and dimensions of buildings
which could conceivably be used to exclude some common sizes of manufactured housing; however; that was not done in either of these cases.

There is legal opinion that distinguishing between mobile homes or factory built dwellings and conventionally built dwelling may be an attempt to regulate form or character for residential structures rather than regulate the land use itself. This argument has been used by mobile home manufactures to challenge some local government bylaws. (Buholzer, 2001, Sec. 7.104 & 7.105).

In the case of the City of Nanaimo, the definition of a single family dwelling includes mobile homes provided they are equal to or exceed a width of 7.3 metres (24 feet) (Nanaimo, 2005, p. 4-5). This dimensional threshold would appear to exclude single-wide mobile homes from being considered as single family dwellings thus precluding their use on single family residential lots. However, the way the City of Nanaimo has implemented this exclusion, based on the size of the structure rather than how it is fabricated, it would appear to be consistent with authority granted under Section 903 of the LGA to regulate the size of buildings and structures.

Five of the local governments interviewed have dwelling/single family dwelling definitions that specify the exclusion of recreational vehicles. The five local governments are the Comox-Strathcona Regional District, the Village of Cumberland, the Town of Qualicum Beach, the City of Nanaimo and the Cowichan Valley Regional District (Electoral Area 'G'). In the Case of the Cowichan Valley Regional District the
newer Electoral Area 'G' zoning bylaw from 2005 is more specific or precise in its dwelling unit definition compared to the regional district's older 1986 zoning bylaw used in Electoral Area 'B'. In addition the newer CVRD bylaw is the only one of those compared whose definition of dwelling or dwelling unit specifically excludes park model trailers.

Six of the local governments' bylaws definitions of dwelling/single family dwelling unit are less direct in their exclusion of RVs where the definition says, for example, "intended for year round occupancy" or "permanent". It may be difficult to argue that an RV is permanent given the incorporation of wheels and lack of attachment to the ground. In the case of the town of Ladysmith a dwelling is a "building" which clearly a RV is not.

In five of the bylaws there appears be nothing within the dwelling unit definition itself that would preclude the inclusion of RVs. However, this does not guarantee that there are not prohibitions contained elsewhere in the respective bylaws that would prohibit this use.

In comparing the seventeen bylaws it appears that recreational vehicles, including travel trailers and campers, are generally excluded from the definition of a mobile home. The exclusion of RVs from being defined as mobile homes has been achieved by local government within the study area through three different means. One way has been through the specific mention of their exclusion, such is the case in the City of Courtney's zoning bylaw (Courtenay, 1986, p. 9). Another method of excluding RV from the
definition of mobile home has been fully defining mobile homes to the complete CSA standard, in this case CSA-Z240 Mobile Home series standard as was done in the Village of Cumberland zoning bylaw (Cumberland, 1993, Part 2).

Atypically, the zoning bylaw for Cumberland and zoning bylaw No. 2781 for the Comox-Strathcona Regional District define a mobile home as also included in factory built accommodation manufactured to the CSA-Z241 standard, in addition to the CSA-Z240 MH series standards (Cumberland, 1993, Part 2) (CSRD, 2005, p. 13). In other words both of these definitions appear to consider one of the two forms of park model trailers as a mobile home suitable as a permanent dwelling.

There appear to be differences with respect to how park model trailers are classified. Three of the jurisdictions do not mention park model trailers at all within the definition section of their respective land use bylaws. Conversely, the Comox-Strathcona Regional District in bylaw No. 2781 and the Village of Cumberland and the City of Nanaimo in their respective zoning bylaws define park model trailer making reference to the CSA-Z241 type standard (CSRD, 2005, p. 15) (Cumberland, 1993, Part 2) (Nanaimo, 2005, p. 4-14).

As previously mentioned in Section 2.2 of this report, there are two types of park model trailers. Those that are intended to be relocated occasionally are classified as park model trailer 102, by the CRVA. The second type of park model is the recreational unit, which is designed to remain in place and requires highway permits and special tow vehicles to
move it. Park model trailers 102 are manufactured to CSA-Z240 RV series standards (CRVA, 2006, Park Model Trailer 102 ¶3) whereas the park model recreation units are manufactured to CSA-Z241 series standards (CRVA, 2006, Park Model Recreational Unit ¶3). Neither of these standards appears to be intended as a permanent dwelling.

There does not appear to be a consensus among the local governments within the study area on what constitutes a mobile home. All definitions examined would consider CSA-Z240 MH series type units as mobile homes and would exclude recreational vehicles as such. However, there appears to be a blurring of the lines with respect to park model trailers. Some jurisdictions classify park model trailers as a unique construct, other classify them as mobile homes, but the majority do not mention them at all. The definition of mobile home, in newer bylaws, appears more likely to be specified according to CSA standards. Furthermore, the more recent bylaws appear more likely to define park model trailers.

The definition of recreational vehicle appears to be fairly similar across the jurisdictions within the study area. It is defined as being a vehicle or structure capable of being licensed that provides temporary accommodation. The exceptions are the Village of Cumberland and the Comox-Strathcona Regional District that both exclude park model trailers from their recreational vehicle definition. In the case of the City of Nanaimo a park model trailer is not mentioned in the definition of RV but defined separately for the CSA-Z241 type. In these cases it would appear that CSA-Z240 RV standard park model
trailers would be included as recreational vehicles but that CSA-Z241 standard park model trailers would not. In the case of North Cowichan, Lake Cowichan and Electoral Area 'B' of the CVRD recreational vehicles are not defined at all.

The inclusion of both types of park model trailers as recreational vehicles is unclear. In most jurisdictions it appears that park model trailer CSA-Z240 would be included as an RV. Park model trailers built to the CSA-Z241 standard on the other hand would not appear to be RV because once they are set up they no longer have wheels and are only movable with a special permit not a licence like a vehicle. The CSA-Z241 class of park model trailers appears to be outside the regulatory framework of many jurisdictions.

In comparing the definition of RV park / campground or equivalent it appears that all jurisdictions permit recreational vehicles and exclude mobile homes. However two local governments, the Comox-Strathcona Regional District and the Village of Cumberland also specifically exclude the use of park model trailers at RV parks or campgrounds. It would appear that in the CSRD and Cumberland that park model trailers, at least of the CSA-Z241 variety, are indeed not recreational vehicles but a type of permanent dwelling the same as a mobile home.

It appears that the park model trailer type 102 (CSA-Z240 RV) would qualify as a recreational vehicle within all of the regulatory frameworks due to the fact that it is licensable as a vehicle and can travel with out special permit (CRVA, 2006, Park Model Trailer 102 ¶3).
The City of Nanaimo has a unique approach to its campground and RV park definitions. Where campgrounds only allow for the temporary accommodation in recreational vehicles, RV parks allow for both temporary and permanent accommodation in both RVs and park model trailers. With the exception of the City of Nanaimo, no other jurisdiction appears to have regulations that would permit year round living at an RV park or campground.

Clearly the majority of local governments on eastern Vancouver Island have not contemplated park model trailers at all. Only a minority of local governments have classified park model trailers within their bylaws; two of which allow some park model trailers to be used as a permanent dwelling, the same as a mobile home. Only one jurisdiction, the City of Nanaimo, has considered both park models and RVs as forms of permanent accommodation.

3.4 LOCAL GOVERNMENT SURVEY

Interviews were conducted with a planner or building inspector from eleven local governments on the eastside of Vancouver Island to gain an understanding of the use and regulation of recreational vehicles, park model trailers, manufactured homes, campgrounds and RV parks. The geographic area encompasses a number of medium-sized cities, small towns and rural areas that share a common coastal geography and are interconnected in a linear fashion along the Island Highway. The local governments that
were interviewed include two regional districts and nine municipalities. The range of jurisdiction is hoped to provide both urban and rural perspectives. Two jurisdictions within the geographic study area were unwilling to participate in this survey and with one jurisdiction it was not possible to co-ordinate and interview within the allotted time frame.

The following survey questions were asked of each local government representative:

1. Does your jurisdiction differentiated between RVs, park model trailers and mobile homes? If so how?
2. In what zones are RV generally permitted?
3. Are RVs and park model trailers permitted in the same zones?
4. Are there any zones that allow park model trailers but exclude RV or vice versa?
5. Are there any zones that allow RV or park model trailers that also permit manufactured homes?
6. Are there any properties within your jurisdiction where RVs and / or park model trailers are either permitted or exist historically along with manufactured homes?
7. Generally speaking is there a specified time limit on how long someone can stay / reside in an RV or park model trailer?
8. Is there any special or comprehensive zone or zones where someone could stay in either an RV or park model trailer on a year-round basis?
9. In your experience, are there persons living in RVs or park model trailers on a full
time basis within the jurisdiction? Would this full time occupancy be occurring on
appropriate zoned properties?
10. To what extent are campground regulations that deal with length of stay enforced?
11. Have there been any complaints related to RV or park model trailers, especial with
respect to their occupancy?
12. Are you aware of the difference classification and standard that various factory build
accommodations (RVs, Park model trailers, manufactured homes, modular homes)
are manufactured to? If so please detail.
13. Do you see any trends related to the use of RVs, park model trailers and mobile
homes within the jurisdiction, especially with respect to the provisioning of shelter?
14. How is the local government addressing affordability of shelter? Are there any
programs in place or special provisions in bylaws etc.?
15. Are you aware of any barriers to affordable housing within the jurisdiction?
16. What are the overall housing cost trends in the jurisdiction?

[Follow-up question via e-mail] Does the jurisdiction allow someone to temporarily
reside in an RV while constructing a single family residence? And if so is there a time
limit?

Detailed responses are included in Appendix B and a summary appears in this section.

The response to the first question "Does your jurisdiction differentiated between RVs,
park model trailers and mobile homes? If so how?" indicates that all the local
governments differentiate between RV and mobile homes often citing the CSA Z240 standard as being the deciding factor in what constitutes a mobile homes versus a travel trailer or other recreational vehicle. About half of the respondents mentioned that park model trailers are something they differentiate from mobile homes and in the majority of cases were classified as mobile homes. Only staff from the City of Nanaimo mentioned that park models are built to the CSA Z241 standard.

In reply to the question "In what zones are RV generally permitted?" there is a general consensus, amongst those local governments that have zoning provision for recreational vehicles, that they would typically be permitted in commercial or commercial recreation type zone. This question also revealed that five of the eleven jurisdictions do not have any properties within their boundary that are presently zoned to allow recreational vehicles to be used for recreational accommodation. The Town of Comox indicated that their zoning bylaw does not have any zones as there are no RV parks in the town.

The reply to the question "Are RVs and park model trailers permitted in the same zones?" was "yes" in those jurisdictions that permit recreational vehicle use. However, some of the responses show that there may be confusion over what a park model trailer is. For example, Staff from the Regional District of Nanaimo asked "When you say park model, can you elaborate a little bit on that?" also Staff from the Cowichan Valley Regional District asked a similar question "Well what do you mean by park model trailer?".
The question "Are there any zones that allow park model trailers but exclude RV or vice versa?" resulted in an overall response of "No". However, there still may be some confusion over the meaning of park model trailer as an explanation of the term was provided in one instance.

The question "Are there any zones that allow RV or park model trailers that also permit manufactured homes?" resulted in an overall response of "No". In response to this question one City of Courtenay Staff indicated that there "Might be in a couple of existing trailer parks that have been around for a long time that still have a mixture [of RV and mobile homes] in them".

The question "Are there any properties within your jurisdiction where RVs and / or park model trailers are either permitted or exist historically along with manufactured homes?" was answered "yes" by three local governments "maybe [or] might be" by two and "No" by six.

The question "Generally speaking is there a specified time limit on how long someone can stay / reside in an RV or park model trailer?" was answered by most of the local governments that permit recreational vehicle use as being a temporary use without a precise definition in terms of time. However, two of the jurisdictions specify a maximum time limit of 90 day and 6 months respectively. In addition, the City of
Nanaimo specifies a maximum stay of 90 days at campgrounds and 365 days under the RV1 zone for both RVs and park model trailers.

The question "Is there any special or comprehensive zone or zones where someone could stay in either an RV or park model trailer on a year-round basis?" was answered "No" by every jurisdiction with the exception of the City of Nanaimo.

In reply to the question "In your experience, are there persons living in RVs or park model trailers on a full time basis within the jurisdiction? Would this full time occupancy be occurring on appropriate zoned properties?" is literally all over the map. Those jurisdictions without RV zones indicated that to the best of their knowledge there are no persons living in RV on a full time basis. A few of the jurisdictions speculate or have unconfirmed suspicion that there may be some people living full time in recreational vehicles within their jurisdiction. Two local governments said a more definitive "yes" that they do have persons living in RV on a full time basis within jurisdiction. All local governments indicated that such use would not be on an appropriately zoned property, with the exception of the City of Nanaimo.

In answer to the question "To what extent are campground regulations that deal with length of stay enforced?" they either are not actively enforced or the jurisdiction does not contain any campgrounds.
The question "Have there been any complaints related to RV or park model trailers, especial with respect to their occupancy?" was primarily answered with either "not to my knowledge" or "not aware". One jurisdiction indicated that there may be the odd complaint when a travel trailer overstays its welcome on a single family residential lot, but overall there had been no formal complaints.

The answers to the question "Are you aware of the difference classification and standard that various factory build accommodations (RVs, Park model trailers, manufactured homes, modular homes) are manufactured to? If so please detail" provided some very frank answers such as "I am not 100% educated on the detail of their manufacture" or "I am not well informed. Nominal understanding." or just a simple "Nope". These initial answers were further expanded with about half the local government mentioning CSA or CSA Z240 standards that mobile homes are manufactured to.

In reply to the question, "Do you see any trends related to the use of RVs, park model trailers and mobile homes within the jurisdiction, especially with respect to the provisioning of shelter?" the most universal response is that there is no trend.

In reply to the question "How is the local government addressing affordability of shelter? Are there any programs in place or special provisions in bylaws etc.?" most local governments indicate that the extent of their current provisions for affordable housing is offered thorough density bonuses or secondary suites provisions in zoning
bylaws. In addition the two regional district staff indicated that higher development was encouraged in urban centres. The Town of Comox and City of Courtenay, both member municipalities of the Comox-Strathcona Regional District, indicate that steps were starting to be taken to setup some kind of housing committees to investigate the issue of affordable housing. Only the City of Nanaimo has indicated that they have developed an affordable housing strategy.

In answer to the question "Are you aware of any barriers to affordable housing within the jurisdiction?" there appears to a diversity of barriers to affordable housing such as lack of raw land or low rental vacancy rates and a lack of response by the market to meet growing housing demand.

The reply to the question "What are the overall housing cost trends in the jurisdiction?" it is unanimous that housing costs are increasing. Several local governments have indicated that housing prices for single family dwelling have doubled over the last two or three years. One local government indicates that over the last twelve months, as of the date of their interview, housing cost have gone up 23% compared to the previous period.

In answer to the question "Does the jurisdiction allow someone to temporarily reside in an RV while constructing a single family residence? And if so is there a time limit?" Urban municipalities such as the Town of Comox, City of Nanaimo and the City of Duncan and the more rural District of North Cowichan indicate that the use of RV as a
temporary residence while building a single family residence is prohibited. The more rural Regional District of Nanaimo and the Cowichan Valley Regional District, plus the municipalities of the District of Lantzville and the Village of Lake Cowichan indicate that they permit the use of an RV as a temporary residence while a single family residence is under construction. In addition, the Town of Qualicum Beach indicates that an RV may be used by a security guard during construction.

3.5 LOCAL GOVERNMENT ANALYSIS

The survey reveals that the local government officials are aware that their jurisdictions differentiate between recreational vehicles and mobile homes. Often reference was made to the CSA Z240 standard as a requirement for factory built accommodation to be considered a dwelling unit. The classification of park model trailers was less definitive. During the survey an explanation of park model trailer was asked for by six of the eleven local government representatives, indicating that the term was unfamiliar to many. Only one jurisdiction mentioned the CSA Z241 standard that park model trailers are manufactured to, that being the City of Nanaimo. Also, there does not appear to be a full understanding of the CSA Z240 standard as both mobile homes and recreational vehicles are in fact built to CSA Z240 standards, albeit of a different sub-classification for each type. Mobile homes are factory built to the CSA Z240 MH series standard while recreational vehicles are factory built to the CSA Z240 RV series standard. Some confusion may be created through the similarity of the CSA’s naming conventions for mobile homes and recreational vehicles.
The specific standards that various factory built accommodations are manufactured to would appear not well known by local government planners. This is not a total surprise, given that it is not something that is dealt with on a regular basis by planning staff, at least in my experience working in municipal planning office. However, it does create a situation where regulations and bylaws may be created that do not represent the different types of manufactured accommodation. This may be particularly pertinent with respect to park model trailers and their use where the general term itself is unfamiliar to many. It is interesting that historic confusion over the classification of manufactured accommodation continues to exist to the present day. The unfamiliarity of many local government officials with new build forms of manufactured accommodation such as park model trailers is a case in point.

The survey indicates that recreational vehicles would typically be permitted for temporary accommodation in tourist commercial or recreational type zones, in jurisdictions where this land use is permitted. Unexpectedly, five of the nine municipalities do not have any properties where RV parks or campgrounds are a permitted use. These five municipalities would appear to have more confined municipal boundaries containing less rural land.

Where campgrounds and RV parks are a permitted use both RVs and park model trailers are permitted within the same zone. One jurisdiction that answered 'no' I suspect may have been confused by the park model trailer designation. In all of the local governments
participating in the survey there does not appear to be any zones that would allow park model trailers while excluding RV or vice versa; noting that two responses were inconclusive. In addition, mobile home parks are exclusively for mobile homes. In addition, two participating regional districts and one municipality indicated that they believe there are non-conforming properties where mobile homes may exist in conjunction with recreational vehicles or park model trailers.

All of the local governments surveyed, that allow temporary accommodation in an RV or park model trailers, limit the length of stay, either though setting a specific number of days or classification as a temporary use. However, in the case of the City of Nanaimo it allows for both a limited stay of 90 days and unlimited stay of 365 days, depending on the zoning on the property. Some jurisdictions also indicated that as part of their building permit application process an RV may be used for temporary accommodation while a residence is under construction.

Those municipalities and regional districts that have RV parks or campgrounds indicate that there are probably persons living in RVs on a full time basis within their jurisdiction. Length of stay, however, does not appear to be actively enforced. This would indicate that complaints related to the use of RVs or park model trailers are virtually non-existent as generally enforcement is undertaken primarily on a complaints basis.

All jurisdictions have indicated that housing costs have been increasing, and in most cases this appears to be substantial. In some cases it is estimated that there has been a
doubling of housing prices within the last two to three years. As one local government representative put it "they are skyrocketing”. According to British Columbia Multiple listing statistic for the 2003 to 2005, a period of thee years, the average residential price on Vancouver Island has gone from $169,578 to $235,095 (BC Stats, 2006 January). This change in price represents a 72% increase.

The majority of local governments interviewed appear to address affordability through land use bylaw incentives. These incentives consist of density bonuses for multi-family zoned properties and provisions to allow for secondary suites or smaller single family residential lots. There also appears to be a trend toward the establishment of an affordable housing taskforce or similar organization within some of the jurisdictions to begin studying the issue of affordability. Overall it appears that cost and availability are the leading barriers to affordable housing; however, within two communities the issue of NIMBY-ism (not in my back yard) appears to also be a barrier to addressing affordability.

If there is a demand for affordable housing one would assume that mobile home would be one avenue that could be undertaken by developers. Yet the vast majority of local government planners have indicated that there is no trend, in other words the situation is static. In addition, campgrounds and resorts also appear to be in a holding pattern. What is going on? The City of Nanaimo planner speculates that higher mobile home park standards may be part of the reason. These may have increased the costs for more extensive paving and landscaping. Could it also be due to the increase in land cost or
limits in the supply of available land? These questions are beyond the scope of this study but they are intriguing nevertheless and open a door for further investigation.

3.6 CAMPGROUND AND RV PARK SURVEY

Review of RV park / campground web sites has been conducted in order to answer a set of predefined survey questions to gain an understanding of the long-term use of recreational vehicles and park model trailers. In addition, a telephone interview was conducted with one RV park in an attempted to gain some additional insight. The selection process is detailed within the methodology section of this report.

The RV park / campground survey questions are as follows:

1. How many camping or RV spaces are available here? And are different types of spaces offered?
2. What are the rental rates?
3. Is there a maximum length of stay?
4. Typically what percentage of tenants are longer stay guests (6 month or more)
5. Are there any year-round tenants?
6. Do some RVs stay parked on a permanent basis?
7. Of those guests who are long-stay, of whom would they typically consist?
8. What amenities and services are offered here?
9. What would be the typical distinguishing features between long-term guests and those that are more seasonal?

10. Have there been challenges due to local government regulation, especially with respect to long term guests?

11. Do you allow park model trailers? And, if so, are there any differences between the rules that apply to park models and RVs?

12. Are there any trends or changes with respect to long-term guests?

13. What would the range of RV-types used by long-term guests be?

14. Are there some types of RV that are more popular amongst different type of long term guests? If so, please elaborate?

15. Is it possible to be introduced to a few long-term guests/tenants, if they are willing to meet with me?

A virtual survey was conducted using publicly available information for campground and RV park web sites within the study area. While it was not possible to answer all of the survey questions the most relevant were answered.

In regards to the question "How many camping or RV spaces are available here? And are different types of spaces offered?" the rage in the number of spaces was from 30 to 114 campsites / RV spaces. All the campgrounds / RV parks offer both fully serviced spaces. Many also include partially serviced and non-serviced recreational vehicle spaces. In addition, some campgrounds and RV parks include cabins, and hotel rooms.
Answers to the question "What are the rental rates?" showed that they vary depending on the season. The majority of campgrounds / RV park have seasonal rate schedules differentiating between the summer, winter and the shoulder which is late spring and early fall. The summer rates, using the most reasonably priced full-service campsite at each RV park or campground, range from $290 to $768 a month with an average price of approximately $515. Shoulder rates, using the same criteria as summer, range from $280 to $600 a month with an average price of approximately $425 and winter rates ranging from $280 to $600 with an average price of $350. Summer comprises the months of July and August with the shoulder season typically including May, June and September. The remaining seven month, form the beginning of October though to the end of April make up the winter season.

In regards to the question "Is there a maximum length of stay?" only one campground stated a maximum length of stay on their web site, at six months. No other campground or RV park web site indicates that there is a limit on the length of stay. In addition, the RV park that participated in an interview survey confirmed that they do not have a maximum length of stay.

With respect to the question "Are there any year-round tenants?" the RV Park 'A' (the interviewed park) indicated yes. In reviewing the web sites of the other RV Parks there appears to be content that suggests long-term staying. For example one web site states "Special long term rates are available. Please contact us for details. …Consider a
seasonal or long-term site with special long term rates and become one of our RV family."

In regards to the question "Do some RVs stay parked on a permanent basis?" RV Park 'A' indicated "Yes". The web site of other RV Parks provided no direct indication or statement.

In answer to the question "Of those guests who are long-stay, of whom would they typically consist?" RV Park 'A' answered simply "Seniors". The web site of the other RV parks did not provide any indication.

The answer to the question "What amenities and services are offered here?" a web site review of the RV Parks being studied indicated that the following type of amenities and services are commonly offered: washrooms, hot showers, convenience store, laundromat, heated pool, games room, water hook-up, sewer hook-up, electric hook-up, cable TV and often internet service.

In regards to the question "Do you allow park model trailers? And, if so, are there any differences between the rules that apply to park models and RVs?" the interviewed RV park, indicated that yes they allow park model trailers but that there is no difference in the rules. The web site for RV Park 'H' indicates that "park model trailers are welcome". The other RV park web sites are silent in this respect.
While from the web sites is was not possible to answer the question "**Are there some types of RV that are more popular amongst different type of long term guests? And if so, please elaborate?**" one way or the other, the RV park that was interviewed indicated that there is a good mix of RV types with no clearly dominant type.

Regarding the question **"Is it possible to be introduced to a few long-term guests/tenants, if they are willing to meet with me?"** obviously this was not possible form the web site. With respect to RV Park 'A' the tempo of conversation indicated that it would be too much to ask, and in addition I also had someone lined up to interview from the park.

From the web sites is was not possible to answer the questions listed below. In addition, the answers to these same questions by RV Park 'A' who participated in the interview survey were not specific enough to be conclusive. The unanswered or inconclusively answered questions are as follows:

- "Typically what percentage of tenants are longer stay guests (6 months or more)?"
- "What would be the typical distinguishing features between long-term guests and those that are more seasonal?"
- "Have there been challenges due to local government regulation, especially with respect to long term guests?"
- "Are there any trends or changes with respect to long-term guests?"
- "What would the range of RV-types used by long-term guests be?"
3.7 CAMPGROUND AND RV PARK SURVEY ANALYSIS

In comparing the eleven RV parks, all of which are open on a year round basis, it was found that nine list monthly rates on their web site and of the two that did not there was an indication that this information is available upon request. Three of the RV park web sites offer some long-term stay special or option without an indication of a time limit. In fact only one campground out of the eleven indicates any maximum stay at all. These findings appear to indicate that long-term stay in recreational vehicles is highly probable at RV parks within the study area that offer monthly rates. It is particularly likely that long-term stay to some extent occurs at the three campgrounds that offer special long-term stay rates. Additionally, one RV park map confirms that a "permanent trailer park available on a year round basis" and the interviewed RV park has also verified that they offer year round occupancy.

With the exception of the summer months of July and August, when campground rates average approximately $515 per month for the least expensive sites, campgrounds appear to a generally be an affordable option. In the shoulder months of May, June and September the campground rates are approximately $425 per month for the least expensive sites. In the winter months, typically from October to April the less expensive full hookup sites average a monthly rate of approximately $350 per month. For seven months of the year living at an RV park would cost almost half of the average rental property rate within the three regional districts and member municipalities. The average
rental rate was $621 in the regional districts of Comox-Stratcona and Cowichan Valley and $645 in the Regional District of Nanaimo for the year 2001 (BC Stats, 2005).

All of the RV parks offer amenities that would be beneficial to anyone staying on a long-term basis. All offer full service sites with water, sewer, and hydro services. In addition, the majority of sites also have cable TV and telephone services available. Laundry, washroom and shower facilities are available at the majority of RV parks. Many also have other features such as club houses, games rooms, swimming pools and internet services that may enhance the more basic needs of a long-term stay tenant.

Two amenities, sanitation and potable water may potentially be most affected by long-term RV park or campground occupancy. In the case of potable water one must consider that existing campgrounds or RV parks typically operate at full capacity during the driest two or three months of the year when water is scarce, and yet this does not appear to be an issue. Clearly, a campground or RV park would have water systems designed and in place to provide service to those seeking accommodation during the busy summer season. In the fall, spring and winter months, when rain is prevalent on the west-coast, potable water should be even less of a concern. In regards swage disposal, particularly when on-site systems such as septic fields are used, the systems are designed to handle the summer peak demands. In the typical off-season, when the ground may be more saturated with water, the septic field may or may not be less efficient at handing a heavy usage depending on the specific soil conditions. Typically demands on sewage disposal systems would also be less in the off-season; however, even in the off season there still are special
events and long weekends where the disposal system would need to be designed to handle full capacity. Considering that during the summer in addition to the RVs site being full that there are likely tenters and picnickers at campgrounds and RV parks that place additional demands on sanitation services it seem highly unlikely that full-time RV tenants would compromise these systems. I also suspect that the number of persons that would live in an RV on a full-time basis would be fewer than those who camp in one during the summer. Certainly, as part of any process to legitimize the use of a campground or RV park for long-term stay use, there would be an opportunity to verify the adequacy of on-site services.

The RV parks cater to a number of different types of accommodation. Many offer a range of serviced and partially serviced RV sites. Some RV parks also feature a motel or cabins and tenting grounds. However, only the interviewed RV park and one other RV park in the web survey appear to accommodate park model trailers. The accommodation of park models would appear to be less common than for traditional recreational vehicles at RV parks. However, I am aware of three other RV parks that were not part of the survey, that do accommodate park models. So the accommodation of park model trailers is not that rare either. Park models by their larger nature would be less likely to be moved and thus would, in my opinion, tend to indicate more permanent and less transient place of habitation for long-term stay. As the park model sites are in the minority it is likely that at most long-term stay campgrounds residents would tend to be somewhat transient. Although the one RV park that granted an interview indicated that there was a range in
the duration of long-term stay tenants from months to a number of years in RVs, in addition to the more typical long-term stay in park model trailers.

In summation, there would appear to be plenty of opportunity afforded to those interested in long-term occupancy in RVs and park model trailers throughout the study area, weather permitted by local governments or not. It is clearly more affordable than conventional housing and may offer unique amenities not available in other housing options.

3.8 RV AND PARK MODEL TRAILER DWELLER SURVEY

Interviews with RV and park model trailer dwellers were conducted using a predefined survey and general discussion format. RV and park model dwellers consisted of both present and former occupants. The selection process is detailed within the methodology section of this report. It is the intention of this section to gain insight on the selection of RV and Park model trailer a place of residence by those who have made the choice.

The following survey questions were asked of the RV or park model dwellers:

1. How long have you stayed at this campground or when you were living in an RV how long were you living at that location?
2. How many months a year do you or did you live in your RV?
3. Do you or did you at the time own or rent a permanent dwelling?
4. Is there anything that you miss from living in a full-time dwelling?
5. What are the things about RV living that appeal to you?

6. What is your usual length of stay at a given campground?

7. How often do you change campgrounds or locations?

8. What are some the reasons why you have chosen to live in a RV?

9. What are the advantages and disadvantages to RV living?

10. Does or did your RV fulfill your housing need adequately?

11. Does or did your RV fulfill your housing need adequately?

12. Where are you originally from and why have you chosen to locate here?

13. Are you presently or were you at the time employed, retired or other?

14. May I ask what your annual income is or was it at the time? Or range or number?

15. What do or did you pay for rent here?

16. Is your RV paid in full?

17. At the time that you are/were living in an RV, what are/were your future plans with respect to housing?

Six interviews were conducted, five by telephone and one in person. The interview lasted between ten and twenty minutes each. Those interviewed consisted of three women and three men all for whom, except one, were then living in an RV or park model trailer with a partner. Four of the six persons interviewed are former RV dwellers, while the other two presently reside in park model trailers. While the exact ages of those interviewed were not tracked, they all would be considered middle-aged within the 40-60 year age range.
The answer to the question "How long have you stayed at this campground or when you were living in an RV how long were you living at that location?" ranged from 4 months to 5 years; with four of the six the people interviewed living or having lived for more than 2 years at the same location.

In response to the question "How many months a year do you or did you live in your RV?" four of the six people interviews indicated that they live or lived 12 months of the year in a recreational vehicle.

In answer to the question "Do you or did you at the time own or rent a permanent dwelling?" all answered no; however, three indicated that they at the time there were in the process of ether constructing or saving up for a single family dwelling.

In answer to the question "Is there anything that you miss from living in a full-time dwelling?" the overwhelming answer was more storage space. Some of the people interviewed who live or have lived in recreational vehicles went further and mentioned kitchen, bathroom and heating facilities were things they miss or missed.

In reply to the question "What are the things about RV living that appeal to you?" were all individual and varied from "it was cheap" or "beautiful setting" or "a smaller way of living". Generally it was seen a unique way of living from the mainstream.
The question "What is your usual length of stay at a given campground?" was not really answered. For the most part their living situation was either a one-time event or a long-term event over a number of years.

The question "How often do you change campgrounds or locations?" was also not really answered. For the same reason as the previous question, that for the most part their living situation was either a one-time event or a long-term event over a number of years.

The reply to the question "What are some the reasons why you have chosen to live in a RV?" had aspect that are unique to the individuals themselves. Some replied that they choose to live in an RV because it is "a novel way to live" or "we could live right on site while we were building". However, two participants indicated that because they had a dog they had difficulty in finding another housing option at the time.

In response to the question "What are the advantages and disadvantages to RV living?" the perceived advantages are individual. The response to the question of advantages included lifestyle, the location, and easy maintenance; however, two answered that it was because it was cheaper.

In response to the question "Does or did your RV fulfill your housing need adequately?" the answer for most was yes, but with condition such as "we knew it was temporary" or "it is adequate but we tailored our life style around it". For one of the two survey participants who live in a park model trailer it was an unconditional yes.
The question "**How would you describe yourself and what is your background and history?**" proved to be too general and difficult for the majority of participants to answer.

There was no one answer to the question "**Where are you originally from and why have you chosen to locate here?**". Only one person answered the question of origin. For others this question may have been too broad. The reasons why they had chosen to locate were various. The reasons included that it was cheap or that the location offered amenities. For others the reason was that they were building their house.

The question of "**Are you presently or were you at the time employed, retired or other?**" all but two indicated that they were employed. Of the two that indicated that they were not employed at the time one was on social assistance and one had a partner that was in gainful employment.

For those that provided an income amount in response to the questions "**May I ask what your annual income is [or was at the time]? Or range or number?**" the rage was between $6000 for one person to $108,000 for one couple. Most of the respondents on an individual basis would appear to be within the $25,000 to $55,000 range.

The reply to the question "**What do or did you pay for rent here?**" revealed that both park model trailer were long-term lease or own their site. Of the remaining interview
subjects that rented, noting that two of the RV dweller lived on their own private property, the costs ranged from $200 to $325.

With respect to the question *"Is your RV paid in full?"* all but one of the interview subject said yes. The prices paid for the travel trailers were under $2500. According to one of the park model trailer dweller interviewed the recent range in prices in the park for a park model trailer and lot range from $130,000 to $227,000.

As for the question *"What are your future plans with respect to housing?"*; all of the people who used to reside in travel trailers or motor homes have now achieved their future housing plan and are living in traditional single family dwelling. One of participants, who lives in a park model trailer, indicates that they do not have any future plans other then their current living situation. The other park model dweller envisions returning to a more traditional dwelling and then at a later date return to the park model for retirement.

An opportunity was afforded to provide other comment, while most did not, one comment was profound, and I quote "It was, in our mind, a perfectly legitimate form of housing for the time that we needed it. It's a shame that it sort of seems to be criminalized to live permanently or long-term in what is classified a temporary or re-locatable dwelling, because it works for people".
3.9 RV AND PARK MODEL TRAILER DWELLER ANALYSIS

Clearly recreational vehicles have been used and are being used for long-term stay and there is a fairly unanimous consensus that recreational vehicles or park model trailers are an affordable way live. The reasons to live in a recreational vehicle or park model trailer appear to be a choice and sometimes necessity.

The persons that live in park model trailers appear to have fewer negative comments with respect to the physical aspect of their housing choice compared to those that lived in smaller travel trailers. All agree that there is much less space than in a traditional dwelling. There is mention of the inadequacy in the heating systems of the travel trailers when the temperature drops into the freezing range. Even in relatively mild southern Vancouver Island it can get in to the minus 7 to 10 degree range for a couple weeks a year. Other than the noise of the heating system, there does not appear to be this same issue with respect to park model trailers. Storage space and room for company are also universal shortcomings of park model trailers and recreational vehicles.

One positive advantage to both park model trailers and recreational vehicles is that they form a less complicated and less material based lifestyle, as there simply isn't the room for it. Another reported by those that live in resorts that cater to park models it that there is a uniquely strong sense of community. The two park model dwellers, who lived at different resorts, both indicate that most of their neighbours are older than themselves and are generally retired.
It appears that the use of a travel trailer for living quarters is more based on cost effectiveness as well as for necessity or utility reasons. In two of the interview cases the fact that they had a dog was part of the reason for their choice. The travel trailer was also selected as a form of temporary housing by all those who made the choice. Two of those interviewed lived in a travel trailer while building a permanent dwelling and one had chosen to live in a motor home to build up savings for a dwelling unit. In two of the cases this temporary accommodation lasted for over 3 years and 5 years respectfully. Temporary accommodations could be seen as more of a perspective or mindset than a length of time. Many people do not live in the same traditional dwelling for more than a couple of years. The park model trailer seemed to be viewed by those in occupation as a more permanent form of accommodation.

One of the persons interviewed, who is a former RV resident, stated as a side note that “I [they] don’t come from a white trailer trash background”. They followed this up further by saying, “We didn't attach any social stigma to it [living in an RV] because it was part of a grand plan for us”. Their statement is poignant thought because there are some fairly pervasive negative stereotypes associated with trailer dwelling in popular media as exemplified in the popular Showcase television network series The Trailer Park Boys. In these stereotypes the trailer dweller is represented as being an unemployed or underemployed, uncouth, boorish, social misfit, drunkard and subject to vice. In addition those portrayed as such are almost always of European heritage. The term “trailer trash” is sometimes used in popular media as a putdown to those that live in mobile homes and
travel trailers. The term itself is likely derived from “white trash”, a derogatory racist and classist term for poor or working class persons of European decent.

Only one person interviewed was down on their luck, so to speak, when they lived in a travel trailer a number of years ago. However, none of the persons interviewed would today fit the “trailer trash” stereotype. In fact, the majority of those interviewed would be considered middle to upper middle-class. The persons interviewed are all presently fully employed professionals of various occupations such as accountant, bookkeeper, general contractor, schoolteacher, and computer systems administrator. All of those interviewed were well mannered, polite and courteous and appeared well adjusted to their lives. One of the persons interviewed, whom I have know for sometime, I had trailer-sat for while they were on vacation; an experience that may have in some way sparked my interest in this as a form of accommodation.

A broad income range is represented; however, overall I would say that of those interviewed most would be considered middle class with incomes higher than may be expected. Those of more modest means are likely under represented in those interviewed. Only one of the persons interviewed was on social assistance at the time that they lived in a travel trailer and a second person interviewed had an estimated family income initially of approximately $25,000 that was shared by two persons. Among those interviewed single persons also are likely under represented.
Both park model trailers and recreational vehicles clearly are and can be used as a form of long-term accommodation. Based on user experience park model trailers appear suitable as a form of long-term residential dwelling with travel trailer and other recreational vehicles being suitable for long term stay but on a temporary basis.
4.0 CONCLUSION

Indirect and direct evidence indicates that recreational vehicles and park model trailers are being used as residences for long-term stay. Local government interviews reveal that RV Parks or campgrounds house persons living in recreational vehicle or park model trailers. In addition, the City of Nanaimo confirmed that year round occupancy of recreational vehicles and park model trailers is permitted on a 365 day a year basis within an RV1 zone. Many of the RV Park web sites throughout the study area mention special rates of long-term stay or nominally list monthly rates, both of which suggest the possibility of year round occupancy. Interviews with recreational vehicle and park model trailer residents both past and present further confirm that there are people who live in RVs on a year round basis within the area. Full time living in an RV is likely more pervasive that one would normally assume, as occupants appear to keep a low profile.

The reasons for living in an RV or park model trailer were as varied as the individuals themselves; however, low-cost and lifestyle choice were the most recurring reasons. For some families, a travel trailer type RV inexpensively filled a temporary housing void while awaiting other housing options; such as the completion of a new house. In some cases though, this temporary situation lasted for 3 to 5 years. For others, particularly amongst the park model trailer residents interviewed, there appears to be more the sense of life style choice.
There was indication from those that participated in the RV and park model trailer dweller interviews that there were challenges associated with living in smaller RVs, such as 24 foot travel trailers and motor homes. The challenges were due mostly to a lack of space and the less satisfactory kitchen, bathroom and heating systems. For park model trailers the indication is that the issue is more one of storage and guest space; although, the same could easily be said for some bachelor suites and small one room apartments.

The primary opportunity afforded to RV residents was affordability in lieu of luxuries and space. It also proved a housing option when other circumstances made it difficult to be housed conventionally. For the park model trailer dwellers the more resort like setting appears to offer more social opportunities and sense of community than is typical in a more conventional housing situation.

The official position of the various local governments that participated in the survey, excluding the City of Nanaimo, was that year-round accommodation in RV and park model trailers is prohibited. In practice none of the jurisdictions were actively seeking out bylaw enforcement on the use of RVs or park model trailers. Where RVs were located at RV parks or campgrounds there does not appear to be active enforcement action. Indications are that enforcement seems to occur only when the RV is used on a property where RVs are not normally anticipated, such as on urban single-family lots and on commercial and industrial properties.
Of those local governments that participated in the interview only the City of Nanaimo allows full time year-round occupancy in an RV or park model trailer at RV parks and campgrounds. Within the City of Nanaimo the occupancy of RVs is only permitted at RV Parks. Also in Nanaimo, park model trailers appear to be permitted for year round occupancy at both RV parks and mobile home parks. The rest of the local governments that were interviewed indicate RV and park model trailers are not permitted as residences within their jurisdiction. Two of the local governments that declined to participate in the interview, the Comox-Strathcona Regional District and the Village of Cumberland have bylaw definitions that suggest that CSA Z-241 park model trailers are considered the same as single-wide mobile homes for zoning bylaw purposes. There does not appear to be consensus among the various local governments on what a park model trailer is. This blurring definition is most pronounced with park model trailer recreation units built to the CSA-Z241 standard. It is not a vehicle nor does it meet the building code as a building. This blurring of the lines appears somewhat reminiscent of when mobile homes themselves began to evolve from their travel trailer origins (Bair, 1967, p. 290).

4.1 RECOMMENDATIONS

Recreational vehicles such as campers, motor homes, fifth wheels and travel trailers are well known by local government officials; however, new types of accommodation such as park model trailers 102 and park model trailer recreation units are not. There is an opportunity for local government to gain a better understanding of the various types manufactured accommodation used within their respective jurisdictions. There is a need
to update older land use bylaws to provide clarity on the use of newer forms of manufactured accommodation, especially with respect to the two types of park model trailers.

Local governments need to be aware that park model trailer recreation units built to the CSA-Z241 series standards, unlike the RV class park model trailer 102 units, do not appear to be presently exempt from the requirements of the BC Building code (British Columbia Building Code 2006, 2006, Division A Part 1 Section 1.1.1.1.2) g)). It is also unlikely that they would be considered exempt as vehicles because, according to the CRVA, they do not retain their wheels upon setup and require a special permit to move (CRVA, 2006, Park Model Recreational Unit ¶ 1 & 5). Clearly there is need for the manufacturers of these units to clarify how they are intended to be used and to demonstrate how they can be legally used either under the BC Building Code or through exemptions from it. It is recommended that local governments carefully consider the implications of CSA-Z241 designation as it relates to park model trailer recreation units and the BC building code prior to making bylaw provisions for their use. Conversely, recreational vehicles and park model trailer built to the CSA-Z240 RV series standard retain their wheels and are capable of being licenced for highway use as motor vehicles. Motor vehicles are not buildings and therefore would not, in my opinion, be subject to the BC Building code. CSA-Z240 RV series recreational vehicles and park models may, from a regulatory perspective, be more easily accommodated for long-term stay at campgrounds and RV parks.
Local governments need to contemplate the unique housing role that RVs and park model trailers can and are providing within their respective jurisdictions. RV and park models are providing a necessary function of temporary accommodation on a longer term stay that is typically contemplated in zoning bylaws. There are persons constructing new homes or between types of permanent dwelling are relying on RV and park models trailers for periods longer than the six months or one year typically allowed at campgrounds. In addition, more local governments should consider allowing the temporary use of recreational vehicles on site during the construction of single family dwellings.

Clearly RV and park model trailers are being used for long-term accommodations in many of the campgrounds and RV parks within the study area, contrary to most local zoning regulations, without incident. As demonstrated by the City of Nanaimo, RVs and park model trailers can and are being successfully used to provide long-term accommodation. It is recommended that more local governments on Vancouver Island consider the approach to RV and park model use that has been undertaken by City of Nanaimo. The City of Nanaimo has incorporated year-round stay provisions into their zoning bylaws for the use of recreational vehicles and park model trailers at RV parks and campgrounds. The reasons to consider long-term stay provisions are that the activity is already occurring and that legalization through the rezoning process would provide an opportunity for the local government to ensure that adequate water and sanitation facilities are in place. Legitimizing long-term staying at RV parks and campground also may benefit those of modest means looking to obtain an affordable form of shelter by providing a greater sense of security. In addition, RVs and park model
trailer living would likely provide residents with a sense of independence and self-reliance that they may not get in another form of more controlled housing.

The interview survey, with RV and park model dwellers, indicates that there are opportunities for RV manufactures to consider amendments to existing standards to make RV and park model trailers better suited for long-term stay, particularly with respect to heating and insulation standards. Alternatively, there may also be an opportunity for manufactures to offer optional products that are more clearly identified as being optimized for winter conditions. For campgrounds and RV parks there are opportunities to consider offering to long-term stay guests amenities such as storage unit, indoor gathering places, bathing and kitchen facilities and visitor accommodations.

The interview survey of Local Governments revealed that many may not be using the tools available to them under Section 904 of the *Local Government Act* for encouraging affordable housing. Those local governments within the study area that have affordable housing provisions in place may not be as effective in their promotion as they could be. It is recommended that local governments look more closely at implementing and promoting the affordable housing provisions offered under Section 904 of the *Local Government Act*. 
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Bylaws


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District of North Cowichan. "Bylaw No. 1775 A Bylaw to Regulate the Establishment Extension, Design and Servicing of Mobile Home Parks". http://www.northcowichan.bc.ca/


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## APPENDIX A - ZONING BYLAW DEFINITIONS

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Dwelling / Dwelling Unit Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Campbell River</td>
<td><strong>Dwelling unit</strong> means a suite operated as a housekeeping unit, used or intended to be used as a domicile by one or more persons and usually containing cooking, eating, living, sleeping and sanitary facilities. (Campbell River, 1998, p79)</td>
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<tr>
<td></td>
<td><strong>Residence, single-family</strong> a building consisting of one dwelling unit or, where permitted, one dwelling unit plus one secondary suite. (Campbell River, 1998, p79)</td>
</tr>
<tr>
<td>Comox</td>
<td><strong>Dwelling unit</strong>, one or more rooms (1) constituting a self-contained unit with only one cooking facility and (2) occupied or designed to be occupied as the permanent residence of one related or unrelated household; does not include a mobile home. (Comox, 2006, p. 7)</td>
</tr>
<tr>
<td>Courtenay</td>
<td><strong>Dwelling unit</strong> means one or more inter-connected rooms designed, occupied or intended for occupancy by a single household and containing living, sleeping and sanitary facilities and not more than one set of kitchen facilities and for the purposes of this definition electrical wiring and plumbing installations designed or intended to be connected to cooking or dishwashing equipment constitute “kitchen facilities” whether or not they are so connected. (Courtenay, 1986, p. 6)</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling, single family</strong> means a detached building containing one dwelling unit, occupied or intended to be occupied as a residence by one family. (Courtenay, 1986, p. 6)</td>
</tr>
<tr>
<td>Cumberland</td>
<td><strong>Dwelling unit</strong> means a self-contained unit consisting of one or more rooms designed, occupied, or intended for occupancy by a family, as a separate household with sleeping and sanitary facilities and not more than one set of kitchen and cooking facilities, but specifically excludes recreational vehicles. (Cumberland, 1993, Part 2)</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling, single Family</strong> means a detached building used for residential use for one family and consisting of one dwelling unit. (Cumberland, 1993, Part 2)</td>
</tr>
<tr>
<td>CVRD Electoral Area</td>
<td><strong>Dwelling</strong> or <strong>dwelling unit</strong> means one or more habitable rooms with one kitchen and self-contained sleeping, living, and sanitary facilities used, designated, or intended as a residence for one family, and does not include a recreational vehicle or park model RV (CSA Z 241).</td>
</tr>
<tr>
<td>Location</td>
<td>Definition</td>
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<tr>
<td>CVRD Electoral Area 'B'</td>
<td><strong>Dwelling</strong> means a self-contained set of habitable rooms with a separate entrance intended for year round occupancy with complete living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation. (CVRD Area B, 1986, p. 4)</td>
</tr>
<tr>
<td>Duncan</td>
<td><strong>Dwelling</strong> means a self-contained set of habitable rooms with a separate entrance intended for year round occupancy with complete living facilities for one or more persons including permanent provisions for living, sleeping, cooking and sanitation. (Duncan, 1988, p. 3)</td>
</tr>
<tr>
<td>Ladysmith</td>
<td><strong>Dwelling</strong> means a building, occupied exclusively as a residence or sleeping place by one or more persons, but shall not include hotels, motels or civic uses. (Ladysmith, 1995, p. 4)</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling unit</strong> means one or more habitable rooms constituting a self-contained unit with a separate entrance, and used or intended to be used together for living and sleeping purposes for not more than one family and containing a separate and properly ventilated kitchen with a sink and cooking facilities and a bathroom with a water closet, wash basin and a bath or shower. (Ladysmith, 1995, p. 5)</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling, single family</strong> means any building consisting of one dwelling unit which is occupied or intended to be occupied as the permanent residence of one family. (Ladysmith, 1995, p. 5)</td>
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<tr>
<td>Lake Cowichan</td>
<td><strong>Dwelling</strong> means a self-contained set of habitable rooms located in a principal building containing a set of cooking facilities and which may contain sleeping, sanitary and recreation facilities. (Lake Cowichan, 2006, P. 4)</td>
</tr>
<tr>
<td>Lantzville</td>
<td><strong>Dwelling unit</strong> means one self-contained unit contained within common walls with a separate entrance intended for year-round occupancy and the principal use of such dwelling unit is residential with complete living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. (RDN, 1987, p. 2-5)</td>
</tr>
<tr>
<td>Nanaimo</td>
<td><strong>Dwelling</strong> means a building used or intended to be used as a residence, but shall not include hotels or institutions. (Nanaimo, 2005, p. 4-5)</td>
</tr>
<tr>
<td></td>
<td><strong>Dwelling, single family</strong> means a building, consisting of one dwelling unit, used or intended to be used as the residence of one family, as a</td>
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</table>
Community care facility licensed under the Community Care Facility Act, or as a residential shelter, and includes a mobile home which:

1. Exceeds a gross floor area of 87 square metres (936.49 square feet);
2. Equals or exceeds a width of 7.3 metres (24 feet);
3. Is assembled on site upon a concrete perimeter foundation system; and
4. Has a sloping roof.

A single family dwelling shall not be construed to include a recreational vehicle or tent. (Nanaimo, 2005, p. 4-5)

**North Cowichan**

**Dwelling unit** means one or more rooms which constitute a single, self-contained living unit including sanitary facilities, sleeping facilities and only one kitchen, and which is used as the residence of only one family. (North Cowichan, 1997, p. 5)

**Parksville**

**Dwelling unit** means one self-contained unit with a separate entrance intended for year-round occupancy, and the principal use of such dwelling unit is residential, with complete living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. (Parksville, 1994, p.6)

**Single family dwelling** means a detached residential building consisting of one dwelling which is occupied or intended to be occupied as a residence of one family. It may contain either bed and breakfast accommodation for a maximum of four (4) persons or accommodation for a maximum of two boarders, lodgers, or roomers. (Parksville, 1994, p.6)

**Qualicum Beach**

**Dwelling unit** means one self-contained unit with a separate entrance intended for year-round occupancy and the principle use of such dwelling unit is residential with complete living facilities for one or more persons, including provisions for living, sleeping, cooking and sanitation; and having only one room equipped with a cooling facility; but excludes a mobile home; recreational vehicle or tent. (Qualicum Beach, 1999, p. 12)

**RDN Electoral Area 'F'**

**Dwelling unit** means one or more rooms which comprise a self-contained unit used or intended to be used for habitation by one or more residents, including living, sleeping and sanitary facilities, and a single kitchen. (RDN, 2002, sec. 5 p. 2)
**RDN**

Electoral Areas A, C, D, E, G, H

*Dwelling unit* means one self-contained unit contained within common walls with a separate entrance intended for year-round occupancy and the principal use of such dwelling unit is residential with complete living facilities for one or more persons, including permanent provisions for living, sleeping, cooking and sanitation. (RDN, 1987, p. 2-5)

**CSRD**

Bylaw No. 2781

*Dwelling unit* means a self-contained unit consisting of one or more rooms designed, occupied, or intended for occupancy as a separate household with sleeping and sanitary facilities and not more than one cooking facility, but specifically excludes recreational vehicles. An additional cooking facility may be permitted where required by a provincial health agency to operate a home occupation or domestic industrial use involving food. (CSRD, 2005, p. 8)

### Jurisdiction

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Mobile Home/Manufactured Home Definitions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Campbell River</td>
<td>Not defined</td>
</tr>
<tr>
<td>Comox</td>
<td><em>Mobile home</em> means a building consisting of one or more rooms (1) constituting a self-contained unit with only one cooking facility; (2) occupied or designed to be occupied as the permanent residence of one related or unrelated household; and (3) manufactured as a unit, designed to be transported on its own wheels or by other means, and arriving at a parcel ready for occupancy apart from incidental operations and connections. (Comox, 2006, p. 13)</td>
</tr>
<tr>
<td>Courtenay</td>
<td><em>Mobile home</em> means a dwelling unit designed to be moved from time to time, which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connection of utilities, and some incidental assembly, and meets or exceeds Canadian Standards Association Z-240 Standards but specifically excludes recreational vehicles. (Courtenay, 1986, p. 9)</td>
</tr>
<tr>
<td>Cumberland</td>
<td><em>Mobile home</em> means a transportable dwelling, which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connections of utilities, and some incidental assembly, and conforms to the Canadian Standards Association's Z240 MH Series 96 and Z241 Series 92 standards, but specifically excludes recreational vehicles. (Cumberland, 1993, Part 2)</td>
</tr>
</tbody>
</table>

**Park model trailer** means a transportable dwelling unit which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connections of utilities and some incidental assembly and conforms to the Canadian standards. (Cumberland, 1993, Part 2)
Standards Association’s Z241 Series 92 standards. (Cumberland, 1993, Part 2)

**CVRD**

**Electoral Area 'G'**

Manufactured home for the purposes of parcels of land that are not subject to the CVRD Mobile Home Park Bylaw, means a transportable, factory-built single family dwelling unit that is:
(a) exempted under Section 1.1.2.2(I)(g) of the British Columbia Building Code;
(b) able to be connected to utility services;
(c) designed to provide year-round living accommodation to one family;
(d) in conformity with the CAN/CSA Z240 Mobile home Series; a maximum of 4.5 metres in width. (CVRD Area G, 2005, p. 4)

**CVRDR**

**Electoral Area 'B'**

Mobile home means a dwelling unit factory built and factory assembled designed for conveyance after fabrication on streets and highways on its own wheels or on flatbed or other trailers and arriving at the site where it is to be occupied as a dwelling unit complete and ready for occupancy except for minor and incidental unpacking and assembly operations such as locating on jacks or other foundation or connection to utilities. Neither a prefabricated home (or structure) nor motor home travel trailer or recreational vehicle shall be included in this definition. (CVRD Area B, 1986, p 6)

**Duncan**

Mobile home means a dwelling unit, factory built and factory assembled, designed for conveyance after fabrication, on streets and highways on its own wheels or on flatbed or other trailers, and arriving at the site where it is to be occupied as a dwelling unit complete and ready for occupancy, except for minor and incidental unpacking and assembly operations such as locating on jacks or other foundation, or connection to utilities. Neither a prefabricated home (or structure) nor motor home, travel trailer or recreational vehicle shall be included in this definition. (Duncan, 1988, p. 5)

**Ladysmith**

Mobile home means any building or structure which is manufactured primarily but not exclusively for residential occupancy and is capable of being moved, by any means, from place to place but specifically excludes travel trailers, campers, recreational vehicles or other vehicles exempt from the provisions of the Mobile Home Act. (Ladysmith, 1995, p. 7)

**Lake Cowichan**

Mobile home means a manufactured structure, CSA approved with a Z240 rating, or other Provincial or Federal designation, which was constructed in 1980 or newer, and assembled as a unit which is intended to be capable of movement from place to place and which
contains one dwelling unit with bathroom facilities, and specifically excludes travel trailers, campers or other vehicles exempt from the provisions or the Mobile Home Act. (Lake Cowichan, 2006, P. 6)

**Lantzville**

Mobile home means a dwelling unit designed to be moved from time to time, which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connection of utilities, and some incidental assembly, and meets or exceeds Canadian Standards Association, Z-240 Standards or the requirements of the Chief Building Inspector, but specifically excludes recreational vehicles. (RDN, 1887, P.2-5)

**Nanaimo**

Mobile home - means a dwelling unit built in an enclosed factory environment in one or more sections, intended to be occupied in a place other than of its manufacture, and includes mobile homes and modular homes which are either completely self-contained or are incomplete, and fastened together and completed on site. All mobile homes must be constructed to either the current CAN/CSA Z240 (Mobile Home) or CAN/CSA A277 (Modular Home) standards. (Nanaimo, 2005, p. 4-13)

Park model trailer means a recreational unit that conforms to the CAN/CSA Z-241 series of standards for park model trailers at the time of manufacture, with a width greater than 2.6 metres (8.53 feet) in transit mode and a maximum gross floor area of 50 square metres (538.2 square feet) when in the setup mode. (Nanaimo, 2005, p. 4-14)

**North Cowichan**

Manufactured home means a unit which exceeds 4.3 m (14') in width and which is equipped with a toilet and a bathtub or shower, and is intended to be occupied, on a year-round, long-term basis, in a location other than that of its manufacture. It shall conform to the CSA A277 series of standards. (North Cowichan, 1997, p. 7)

Mobile home means a dwelling unit not exceeding 4.3 m (14') wide which is equipped with a toilet and a bathtub or shower, and is intended to be occupied, in a location other than that of its manufacture, on a year-round, long-term basis. It shall conform to the CSA Z240 series of standards. (North Cowichan, 1997, p. 7)

**Parksville**

Mobile home means a dwelling unit designed to be moved from time to time, which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connection of utilities, and some incidental assembly, and meets or exceeds Canadian Standards Association Z-240 Standards, but specifically excludes recreational vehicles. (Parksville, 1994, p.11)
Qualicum Beach  
Mobile home means a housing unit designed to be moved from time to time, which arrived at the site where it is to be occupied complete and ready for occupancy except for planing on foundation supports, connections of utilities, and some incidental assembly, and meets or exceeds Canadian Standards Association Z-240 Standards, but specifically excludes recreational vehicles. (Qualicum Beach, 1999, p. 18)

RDN Electoral Area 'F'  
Manufactured home means a dwelling unit greater than 37 m², that is factory built, including mobile homes, modular homes, and is intended to be occupied in a place other than of its manufacture and meets or exceeds the CSA Z240 or CSA A277 certified standard and specifically excludes recreational vehicles. (RDN, 2002, sec. 5 p. 6)

RDN Electoral Areas A, C,D,E, G, H  
Mobile home means a dwelling unit designed to be moved from time to time, which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connection of utilities, and some incidental assembly, and meets or exceeds Canadian Standards Association, Z-240 Standards or the requirements of the Chief Building Inspector, but specifically excludes recreational vehicles. (RDN, 1887, P.2-5)

CSRD Bylaw No. 2781  
Mobile home means a transportable dwelling unit, which arrives at the site where it is to be occupied, complete and ready for occupancy except for placing on foundation supports, connections of utilities, and some incidental assembly, and conforms to the Canadian Standards Association's Z240 MH Series 96 and Z241 Series 92 standards, but specifically excludes recreational vehicles. (CSRD, 2005, p. 13)

Park model trailer means a transportable dwelling unit which arrives at the site where it is to be occupied complete and ready for occupancy except for placing on foundation supports, connections of utilities and some incidental assembly and conforms to the Canadian Standards Association’s Z241 Series 92 standards. (CSRD, 2005, p. 15)

Jurisdiction  
Recreational Vehicle Definitions

Campbell River  
Recreational vehicle a vehicle or trailer that is designed for temporary recreational living. (Campbell River, 1998, p. 84)

Comox  
Recreational Vehicle  
A vehicle containing sleeping and other facilities for use while traveling or vacationing, including such vehicles commonly known as
travel trailers, camper trailers, pick-up coaches, motorized campers, motorized homes, and other similar vehicles. (Comox, 2006, p. 17)

**Courtenay**  
*Recreational vehicle* means any vehicle, trailer, coach, housecar, structure, or conveyance designed to travel or be transported on a highway and constructed or equipped to be used as temporary living or sleeping quarters by travellers. (Courtenay, 1986, p. 11)

**Cumberland**  
*Recreation vehicle* means any structure, trailer, or vehicle used or designed to be used for temporary living or sleeping purposes and which is designed or intended to be mobile on land, whether or not self-propelled, but specifically excludes mobile homes and park model trailers. (Cumberland, 1993, Part 2)

**CVRD Electoral Area 'G'**  
*Recreational vehicle* means a vehicle, capable of being licensed under the Motor Vehicle Act, which is designed for the temporary accommodation of people, and includes motor homes, camper vans, tent and camper trailers, 5th wheel and other motor vehicles converted or adapted for temporary human accommodation. (CVRD Area G, 2005, p. 5)

**CVRD Electoral Area 'B'**  
*Not defined*

**Duncan**  
*Recreation vehicle* means a vehicle, trailer, coach, structure or conveyance designed to travel or be transported on a highway and constructed and equipped to be used as temporary living or sleeping quarters by travelers. (Duncan, 1988, p. 6)

**Ladysmith**  
*Recreation vehicle* means any vehicle, trailer, coach, house-car, structure or conveyance designed to travel or be transported on a highway and constructed and equipped to be used as temporary living or sleeping accommodation by travellers. (Ladysmith, 1995, p. 8)

**Lake Cowichan**  
*Not defined*

**Lantzville**  
*Recreational* vehicle means any vehicle, trailer, coach, house-car, structure or conveyance designed to travel or be transported on a highway and constructed and equipped to be used as temporary living or sleeping quarters by travelers. (RDN, 1887, P.2-13)

**Nanaimo**  
*Recreational vehicle* means any camper, travel trailer, fifth wheel or motor home with a maximum width of 2.6 metres (8.53 feet) in transit
mode which can be used to provide sleeping accommodation and which is capable of being licensed for highway use pursuant to the Motor Vehicle Act. (Nanaimo, 1993, p. 4-16)

**North Cowichan**  
Not defined

**Parksville**  
Recreational vehicle (or RV) means any vehicle, trailer, coach, structure or conveyance permanently fitted with wheels, designed to travel or be transported on a highway and equipped to be used for recreational living and sleeping purposes without requiring continuous connection to sewage, water and electric hook ups. (Parksville, 1994, p. 13)

**Qualicum Beach**  
Recreational vehicle means any vehicle, trailer, coach, house-car, structure or conveyance designed to travel or be transported on a highway and constructed and equipped to be used as temporary living and sleeping quarters by travelers. (Qualicum Beach, 1999, p. 22)

**RDN Electoral Area 'F'**  
Recreational vehicle means any camper, travel trailer, fifth wheel or motor home with a maximum width of 2.6 metres in transit mode and not exceeding 37m2 in floor area, which can be used to provide sleeping accommodation and which is capable of being licensed pursuant to the Motor Vehicle Act. (RDN, 2002, sec. 5 p. 8)

**RDN Electoral Areas A, C,D,E, G, H**  
Recreational vehicle means any vehicle, trailer, coach, house-car, structure or conveyance designed to travel or be transported on a highway and constructed and equipped to be used as temporary living or sleeping quarters by travelers. (RDN, 1887, P.2-13)

**CSRD Bylaw No. 2781**  
Recreation vehicle means any structure, trailer, or vehicle used or designed to be used for temporary living or sleeping purposes and which is designed or intended to be mobile on land, whether or not self-propelled, but specifically excludes mobile homes and park model trailers. (CSRD, 2005, p. 16)

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**Jurisdiction** | RV Park / Campground Definitions
---|---
**Campbell River** | Resort means a tourist establishment providing lodging and sleeping accommodations for the general public, and providing facilities for the serving of meals, and furnishing equipment, supplies or services to persons in connection with outdoor recreational activities. (Campbell River, 1998, p. 84)

**Comox** | Not Defined
<table>
<thead>
<tr>
<th>Location</th>
<th>Definition</th>
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<tbody>
<tr>
<td>Courtenay</td>
<td><strong>Campground</strong> means premises occupied and maintained for temporary accommodation of travellers in trailers, tents, or recreation vehicles. It does not include a mobile home park, motel, hotel or auto court. (Courtenay, 1986, p. 5)</td>
</tr>
<tr>
<td>Cumberland</td>
<td><strong>Recreational vehicle park</strong> means a parcel of land occupied and maintained for temporary accommodation of the travelling public primarily in recreation vehicles which are licensed for the current year and have been brought to the site by the traveller. It does not include cabins, hotels, mobile homes, mobile home parks, motels or park model trailers. (Cumberland, 1993, Part 2)</td>
</tr>
<tr>
<td>CVRD G</td>
<td><strong>Campground</strong> means a use in which campground spaces are provided, occupied and maintained for temporary accommodation of the travelling public in tents, trailers or recreational vehicles. (CVRD Area G, 2005, p. 2)</td>
</tr>
<tr>
<td>CVRD B</td>
<td><strong>Not Defined</strong></td>
</tr>
<tr>
<td>Duncan</td>
<td><strong>Not Defined</strong></td>
</tr>
<tr>
<td>Ladysmith</td>
<td><strong>Campground</strong> means a site occupied and maintained, or intended to be occupied and maintained, for the temporary accommodation of travellers in trailers, recreational vehicles or tents, but does not include a mobile home park, motel or hotel. (Ladysmith, 1995, p. 4)</td>
</tr>
<tr>
<td>Lake Cowichan</td>
<td><strong>Campground</strong> means a parcel providing for the temporary accommodation of travellers using tents or recreational vehicles, but specifically excludes a mobile home park or hotel. (Lake Cowichan, 2006, P. 4)</td>
</tr>
</tbody>
</table>
Lantzville  **Campground** means a parcel providing for the seasonal and temporary accommodation of travelers using tents or recreational vehicles, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

**Recreation vehicle park** means a parcel providing for the seasonal and temporary accommodation of travelers for not more than six months of the calendar year using tents or recreational vehicles, not exceeding 37 m2 (400 ft2) in floor area, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

**Resort vehicle park** means a parcel providing for seasonal or periodic accommodation of travelers or residents using tents or recreational vehicles not exceeding 37 m2 (400 ft2) in floor area, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

Nanaimo  **Campground** means a site intended for the temporary accommodation of travelers for vacation or recreational purposes in recreational vehicles or tents which are not occupied as principal residences, and excludes a mobile home or recreational vehicle park, but may include an accessory laundry facility, washroom and shower facility, convenience store, office, and recreational facilities, provided such uses are limited to the occupants of the campground. (Nanaimo, 1993, p. 4-3)

**Recreational vehicle park** means a site intended for the temporary or permanent accommodation of persons in recreational vehicles or park model trailers, and excludes a mobile home park or campground, but may include an accessory laundry facility, washroom and shower facility, convenience store, office, storage area, and recreational facilities provided such uses are limited to the occupants of the recreational vehicle park. (Nanaimo, 1993, p. 4-16)

North Cowichan  **Campground** means a site occupied and maintained for the temporary accommodation of travelers in recreational vehicles, trailers, camper vehicles, or tents, but does not include mobile home parks. (North Cowichan, 1997, p. 3)

Parksville  **Campground** means the use of land for temporary recreational accommodation of travelling members of the public in tents and recreational vehicles. (Parksville, 1994, P. 4)

Qualicum Beach  **Campground** means a parcel providing for the seasonal and temporary accommodations of travelers using tents or recreational vehicles, but specifically excludes a mobile home park or hotel.
Recreational vehicle park means a lot providing for seasonal or periodic accommodation of travellers not exceeding 6 months using licensed recreational vehicles but specifically excludes Manufactured Home Park. (RDN, 2002, sec. 5 p. 8)

Tourist accommodation means the rental of a lodging unit in a hotel, motel, cabin, camping space and recreational vehicle space for the temporary accommodation of the traveling public with continuous occupancy not exceeding 6 months and specifically excludes a manufactured home. (RDN, 2002, sec. 5 p. 9)

Campground means a parcel providing for the seasonal and temporary accommodation of travelers using tents or recreational vehicles, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

Recreation vehicle park means a parcel providing for the seasonal and temporary accommodation of travelers for not more than six months of the calendar year using tents or recreational vehicles, not exceeding 37 m2 (400 ft2) in floor area, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

Resort vehicle park means a parcel providing for seasonal or periodic accommodation of travelers or residents using tents or recreational vehicles not exceeding 37 m2 (400 ft2) in floor area, but specifically excludes a mobile home park or hotel. (RDN, 1887, P.2-4)

Campground means a parcel of land occupied and maintained for temporary accommodation of the traveling public in tents or recreation vehicles which are licensed for the current year and have been brought to the site by the traveler. It does not include cabins, hotels, mobile homes, mobile home parks, motels or park model trailers. (CSRD, 2005, p. 6)

Recreational vehicle (rv) park means a parcel of land occupied and maintained for temporary accommodation of the traveling public in recreation vehicles, which are licensed for the current year and have been brought to the site by the traveler. It does not include cabins, hotels, mobile homes, mobile home parks, motels or park model trailers. (CSRD, 2005, p. 16)
1. Does your jurisdiction differentiated between RVs, park model trailers and mobile homes? and if so how?

Comox Yes we do differentiate. Town allows mobile (manufactured) homes in one historically zone area that was formally part of the regional district [Comox-Strathcona Regional District]. The area consists of fee simple lots that form a two block neighbourhood of mobile homes. Park model trailers and RV? We would treat those both as RVs. However, we don't have any recreational vehicle parks in the town at the moment.

Courtenay In our zoning we set out the requirements, the requirements in term of the certification level for what can go in to a mobile home park. In this case only those that are approved to CSA standard Z240. Also, have a recreational vehicle zone and were RV is defined.

CVRD Mobile (manufactured) homes are required to be up to CSA Z240 standard. Mobile homes are allowed as single family dwellings. RVs are classified as camping equipment.

Duncan Yes, but have no where in the City where RV campgrounds are permit. All lands are commercial or residential.

Ladysmith Yes. Mobile homes are provided for in a mobile home park zone as dwelling units. Recreational Vehicles are not included as a permitted use in this zone. RV and Park model trailers are not distinguished.

Lake Cowichan Recognize modular homes and mobile (manufactured) homes as dwelling units. Do not have a mobile home park. Do have strata lots that permit mobile homes and regular dwellings.

Lantzville Yes it does. Residential units are required to meet the CSA Z240 standard. RV or park model trailers do not qualify as a Residence.

Nanaimo Yes. Define each one of the entities in the Bylaw and classify by size and CSA certification. For example, park model trailers are classified under the CSA Z241 category. The zoning bylaw is very specific on the width of trailers when in transit mode and how large it is when it is set up.

North Cowichan Believe that bylaws do different between mobile homes and RV type trailers. RV identified as being different from single wide or double-wide mobile (manufactured) homes.

Qualicum We have zone that allows specifically for a mobile home park, one
Beach

property in town that allows that use. Mobile homes would not be allowed in any other zone in the town. So we direct them to this one mobile home park in the town. Don't hear a lot about mobile homes. Don't have restrictions on people parking RVs on their properties. Mobile home would have to meet or exceed the CSA Z240 and specifically excludes RVs. Not sure what a park model is, not familiar with the terminology.

RDN

Yes we differentiate between mobile (manufactured) homes, park models and RV. Basically manufactured homes have to meet the CSA-Z240 standard to be considered as dwellings and to be permitted to have full time occupancy. Whereas RVs and park model trailers typically would not meet that standard and therefore would not be considered dwelling units or be permitted as such.

2. In what zones are RV generally permitted?

Comox

No zones, do not have an RV park in town.

Courtenay

They would be permitted in the recreation tourist commercial zone, which allows campgrounds. Also, have a couple non-conforming lots that are actually located in residential area but are running essentially a campground.

CVRD

Generally allowed in a C4 tourist commercial zone and some other commercial zones. Can sell then in some industrial zones. Can not live in them in residential zones. Some bylaws do allow for them to be on site for up to a year during construction.

Duncan

No RV or campground zones within the City. Fire protection area in the regional district [CVRD] may have some of the campground where people may be living on a permanent basis in RVs.

Ladysmith

C4 tourist recreational zone but do not have any campground sites.

Lake Cowichan

RVs are permitted in the R4 mobile home Park zone, but don't have any properties with this designation. The R4A zone allows modular homes and single family dwellings. Campgrounds [includes RV] are permitted in the P-1 Parks and Institutional zone. One RV place, it’s a strata. Some may live there in RVs year round I think.

Lantzville

No existing zones but there is a legal non-conforming campground.

Nanaimo

Specific RV1 recreation vehicle park zone was created where vehicles can
be on a more permanent 365 days a year basis. Also have a campground zone with 90 days maximum stay, such as the agricultural zone that allow campgrounds. Have only rezoned one property in town to RV1, that being Resort on the Lake off of Arbot Road.

North Cowichan

Some commercial zones that are campground related.

Qualicum Beach

They are not permitted as a use. Do not have any zones that allow for campsites in the town.

RDN

Typically would be in a recreational zone.

3. **Are RVs and park model trailers permitted in the same zones?**

   Comox
   
   No zones.

   Courtenay
   I don't thinks so, I think in our two mobile home zones that there are certain standards. It would be more in the campground areas where you would have the recreational vehicles.

   CVRD
   Yes, they would both be considered tourist commercial uses.

   Duncan
   No zones.

   Ladysmith
   Yes, C4 Tourist Recreational Zone. Familiar with park model trailers. Have not been specifically contemplated in the bylaw. Something that falls nicely in between mobile home and RV. Scale makes them closer to and RV.

   Lake Cowichan
   -

   Lantzville
   Not permitted in current zones.

   Nanaimo
   Yes, in the RV1 zone.

   North Cowichan
   No. Well what do you mean by park model trailer? [explanation] We do not differentiate, so yes.

   Qualicum Beach
   No properties zoned for use.
RDN: In the same zones? Like together? When you say park model, can you elaborate a little bit on that? [It's basically a really large RV] Does it have wheels? [it does have wheels] Yes, they would be in the same zone.

4. Are there any zones that allow park model trailers but exclude RV or vice versa?

- Comox: N/A
- Courtenay: [explain what park models are] unsure.
- CVRD: No. There are areas where a secondary dwelling is permitted but it does not include RV or park model trailers. Both terms are used but no distinction is made.
- Duncan: No zones.
- Ladysmith: No. [no zones]
- Lake Cowichan: -
- Lantzville: Residential RS7 zone allow for mobile homes and CD21 allows for mobile homes but presently no recreational vehicle zone.
- Nanaimo: No, treated the same.
- North Cowichan: No distinction made.
- Qualicum Beach: [no zones]
- RDN: No

5. Are there any zones that allow RV or park model trailers that also permit manufactured homes?

- Comox: No zones.
- Courtenay: No, do not believe so. Might be in a couple of existing trailer parks that have been around for a long time that still have a mixture in them.
- CVRD: No. We use the term manufactured homes and mobile homes inter changeably.
Duncan  No zones.
Ladysmith  No. Only Modular /Mobile allowed in MP1 zone.
Lake Cowichan -
Lantzville  No.
Nanaimo  No.
North Cowichan  No.
Qualicum Beach  No.
RDN  No, not that I'm aware of.

6. Are there any properties within your jurisdiction where RVs and / or park model trailers are either permitted or exist historically along with manufactured homes?

Comox  One area of mobile home and stick built on residential lots but no RV or park models. That’s a type of RV isn't it? [explain park model]
Courtenay  Might be in a couple of existing trailer parks that have been around for a long time that still have a mixture in them.
CVRD  Yes we do. There are a few examples where we have old established mobile home parks that pre-date establishment of the regional district. There is a miss-mash of short term renters in RV and mobile homes. Never really tried to police how long they are renting for.
Duncan  No.
Ladysmith  No.
Lake Cowichan  Not right in the town. Maybe more in the rural areas of the regional district [CVRD]?
Lantzville  Yes, at [Name Deleted] Resort. Park model trailers and mobile home exist on the same property with non-conforming status, but no modular homes.
Nanaimo  No, not aware of that situation.
There maybe some situations in older RV parks but don't know one way on the other.

No, don't think so. There are historic cabins at [Name Deleted] and you might find the odd person in an RV, but unlikely.

Yes.

7. **Generally speaking is there a specified time limit on how long someone can stay / reside in an RV or park model trailer?**

In recreational zones it is considered a temporary use. But I am not sure we define temporary.

A person can't legally reside in an RV in a C4 commercial area, only camp. Very few areas are serviced. Often a lack off approved sewage disposal when an RV is parked some where.

Seasonal use is temporary accommodation. Does not believe there is a date.

When building house can stay in an RV for 18 months.

Temporary Use but not temporary not defined.

90 days camp ground. RV1 365 days park model or RV.

I believe there is but no actively enforced.

Not defined as it is not permitted.

We have said generally no more than 6 consecutive months.

8. **Is there any special or comprehensive zone or zones where someone could stay in either an RV or park model trailer on a year-round basis?**
Comox  [No zones]
Courtenay  No. I don't think any of our comprehensive development zones have RVs in them.
CVRD  No. Not in a comprehensive zone at this time.
Duncan  [No zones]
Ladysmith  No.
Lake Cowichan  No zone.
Lantzville  No.
Nanaimo  Yes, in the RV1 zone.
North Cowichan  No.
Qualicum Beach  No.
RDN  No.

9. In your experience, are there persons living in RVs or park model trailers on a full time basis within the jurisdiction? Would this full time occupancy be occurring on appropriate zoned properties?

Comox  No. Not to our knowledge, we don't have people living in that situation. The recently incorporated regional district bylaws may have some allowance for RV in them but we don't have any campgrounds within the town.
Courtenay  We know with the affordable housing crunch that there are people living out of cars and trailers. Our Bylaw officer certainly has had calls in the last while of people living in residential zone out of a trailer maybe parked in a friend's yard or something. It is happening but I couldn't really pin-point any location. As a trend, it is something we are seeing.
CVRD  We have a problem with illegal camping in the region and looking at ways to enforce that. In BC the demise of the Forest Land Reserve saw a lot of subdivision speculation. Families are investing in large parcels and using RV and campgrounds with out services or legal road access. Some are
even in flood plains. Unsafe and environmental impacts.

Duncan  No.

Ladysmith  No. and No.

Lake Cowichan  There was one person living on a lot for about 20 years. Never did enforce it. One RV place, it’s a strata. Some may live there in RVs year round I think.


Nanaimo  Yes. 1996-1998 some of the camp grounds such as [Name Deleted] and [Name Deleted] were part of the issue. They had a small proportion of the campers that were longer stay residents. Was not actively enforced. Then Resort of the Lake came forward to rezone with 99 years lease and long term stay. There have been bylaw complaints with long term stay on private [residential] lots.

North Cowichan  Have suspicion is that there is, but have not confirmed one way or the other. They would be contrary to zoning.

Qualicum Beach  What is a park model trailer? [explain park model] They would have to meet definition of manufactured home. Don't think so, no RV parks.

RDN  There are people that are probably occupying RVs or park models on a full time basis, but currently they wouldn't have zoning that would permit them to do that.

10. To what extent are campground regulations that deal with length of stay enforced?

Comox  N/A - No campgrounds or RV parks. Bylaws specifically prohibit long term stay. General prohibition no land structure or part thereof shall be used to locate of movable structure for sleeping or residential purposes. However, it does allow stay of less than 30 days per calendar year in residential zones. No more then one residential vehicle on a parcel on any one time. Allowance for a visiting relative or friend okay for a week or two. Multi-family beyond a particular size require some larger stall for RV parking but most developers opt to place covenant on title to prohibiting any RVs on site.

Courtenay  Don't know.

CVRD  -
<table>
<thead>
<tr>
<th>Location</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duncan</td>
<td>[N/A - No campgrounds]</td>
</tr>
<tr>
<td>Ladysmith</td>
<td>[N/A - No campgrounds]</td>
</tr>
<tr>
<td>Lake Cowichan</td>
<td>Campgrounds open for 6 months then shut down for the season.</td>
</tr>
<tr>
<td>Lantzville</td>
<td>Not actively enforced.</td>
</tr>
<tr>
<td>Nanaimo</td>
<td>No complaints after rezoning, as no longer a bylaw enforcement issue.</td>
</tr>
<tr>
<td></td>
<td>Previously had complaints from manufactured home parks operators.</td>
</tr>
<tr>
<td></td>
<td>They viewed long term stay campgrounds as unfair competitors, due in</td>
</tr>
<tr>
<td></td>
<td>part to servicing differences. Lesser standards are typical in an</td>
</tr>
<tr>
<td></td>
<td>RV parks. Lesser price and overhead ie: strata fees. Someone looking</td>
</tr>
<tr>
<td></td>
<td>at a manufactured (mobile) home would also look at RV parks as an</td>
</tr>
<tr>
<td></td>
<td>option. Local residents association originally had complaints as well.</td>
</tr>
<tr>
<td>North Cowichan</td>
<td>Almost none.</td>
</tr>
<tr>
<td>Qualicum Beach</td>
<td>[N/A – no campgrounds]</td>
</tr>
<tr>
<td>RDN</td>
<td>Not enforced as much as they could be; primarily because enforcement</td>
</tr>
<tr>
<td></td>
<td>is based on complaints, for the most part, and we don't get a lot of</td>
</tr>
<tr>
<td></td>
<td>complaints.</td>
</tr>
<tr>
<td></td>
<td>**11. Have there been any complaints related to RV or park model</td>
</tr>
<tr>
<td></td>
<td>trailers, especially with respect to their occupancy?</td>
</tr>
<tr>
<td>Comox</td>
<td>No</td>
</tr>
<tr>
<td>Courtenay</td>
<td>Not aware, does not deal with this directly</td>
</tr>
<tr>
<td>CVRD</td>
<td>-</td>
</tr>
<tr>
<td>Duncan</td>
<td>No, but do get the odd bylaw issue with the relative staying there</td>
</tr>
<tr>
<td></td>
<td>semi-permanently or people visiting for a week.</td>
</tr>
<tr>
<td>Ladysmith</td>
<td>Not to my knowledge. Is not aware of issues in this respect.</td>
</tr>
<tr>
<td>Lake Cowichan</td>
<td>Unaware</td>
</tr>
<tr>
<td>Lantzville</td>
<td>Not in the last year.</td>
</tr>
</tbody>
</table>
Nanaimo  Yes, there have been bylaw complaints with long term stay on private residential lots. With respect to campgrounds, no complaints after rezoning. No longer a bylaw enforcement issue. Prior to rezoning, there were complaints from manufactured home park operators about campgrounds. They were seen as an unfair competitor due to servicing differences. Lesser standards are typical in an RV parks with lesser price and overhead ie: strata fees. Those looking at manufactured homes would also likely look at RV parks as an option. Prior to rezoning, local residents association had complaints about people residing in campgrounds.

North Cowichan  There has been innuendo of complaints, but that is all. Never received a formal complaint. An RV Park owner wanted additional foreshore land and assertions were made at the time that full time use was occurring. However, it was never substantiated.

Qualicum Beach  No.

RDN  Very few and far between.

12. Are you aware of the difference classification and standard that various factory build accommodations (RVs, Park model trailers, manufactured homes, modular homes) are manufactured to? If so please detail.

Comox  BC Building Code, different standard for stick built and mobile homes.

Courtenay  Our bylaw for mobile homes certainly specifies the two standards that are required model number or CSA standards.

CVRD  Our standard that we require is Z240. All the vendors understand what this.

Duncan  Not familiar with park model trailer other they are towed like a travel trailer and are larger than an RV and maybe allow for longer stay. Whereas a manufactured home would need a transport permit to move.

Ladysmith  Nope.

Lake Cowichan  Use CSA approvals with different standards. For modular homes it is A277. They have no permanent wheel or steel beam. Mobile homes are Z240. All inspected while they are built the shop.

Lantzville  Don’t know all of it. Mobile home Z240 standard specifies insulation and way it is built. Park model not built for year round occupancy. Modular built to the same standard as a dwelling unit according to the building
code.

Nanaimo Yes, looked at the differences between these. Realized really quickly that there was a park model. That it was a form of recreational vehicle whose form was between a typical RV and manufactured home, a middle ground. They have a CSA standard but are not a manufactured homes. Learned how RVs were made and the standards they were certified to; CSA Z240 and CSA A277. Tried to work the certification standards into the definitions to get a handle on the distinction of the type of unit. Manufacture certification important in how they were defined in the bylaw.

North Cowichan I am not well informed. Nominal understanding.

Qualicum Beach The only [dwelling unit] standard is the mobile home standard Z240.

RDN I am not 100% educated on the detail of their manufacture. I just know that for the most part they [RVs] wouldn’t our meet our standards to be considered a dwelling unit.

13. Do you see any trends related to the use of RVs, park model trailers and mobile homes within the jurisdiction, especially with respect to the provisioning of shelter?

Comox There is not a movement in that direction. Do have a lot of under utilized tourist commercial land in the town or the surrounding regional district. Don’t have the flocks of campgrounds surrounding the municipal boundary here.

Courtenay Already answered, no trend.

CVRD Not going to happen here that we would allow them as dwellings. Safety issue. Habitable dwellings have to be up to the building code.

Duncan Do not have any of those trends. Don't have the land. Looking at a boundary extension so things may change but nothing now.

Ladysmith Mobile homes are becoming less and less used. More small stick build and modular. Less mobile homes. Do not see that park model or RV is being anything in terms of a trend.

Lake Cowichan -
Lantzville  The use of mobile homes is on the decline as Lantzville becomes more urbanized. Current trend is the replacement of small cabin-sized dwelling units with large houses built to the maximum of the lot; substantial houses and gentrification. Not many mobile homes in Lantzville and they will eventually disappear. Park model trailer not envisioned to increase. They may persist at a non-conforming campground until it is likely redeveloped. Noting that there is no other campground. Also, would think the use of modular homes would increase but have not see a building permit in the last year for a modular home either.

Nanaimo  In 1997 the City realized that people were telling them that campgrounds and mobile home parks were in need of regulatory change to recognize and regulate existing housing forms. Since then have not had a second RV park rezoning. Only Resort on the Lake and maybe a part of the Living Forest campground were rezoned 1997. There have been none since then. Mobile home parks (manufactured homes parks) have not seen a rezoning in many years. There are many previously zoned mobile home parks and are aware that there is very little existing vacancy. But there have been no recent applications. The most recent manufactured (mobile) home development was ten years ago and it looks like a traditional single family neighbourhood.

North Cowichan  No trend.

Qualicum Beach  Don't see trends one way or the other. Static over the years. No pressure for more mobile home parks.

RDN  I think that a couple of things are going to influence the use of RV and mobile homes over the next while here. One of them is likely going to be the real-estate market and the increasing cost of housing which may tend to increase the number of people who are either forcibly put in to RV, because that is the only thing they can afford or have chosen to go in to. The area we live in tends to lend itself to more seasonal type residents, who are here maybe for the summer or maybe live longer them on a recreational property.

14. How is the local government addressing affordability of shelter? Are there any programs in place or special provisions in bylaws etc.?

Comox  Are donning an incremental approach. Existing neighbourhoods are primarily single family. Very strong desire by the community to see that maintained. Presently have a large 20-metre frontage for single family lots. Attempts at smaller lots or other forms of housing in those areas have
not been successful. Having some success in the boundary extension area at introducing new zones as a base. Secondary Suite and lot size focus. Want to encourage smaller 450 m² minimum lots size lots with secondary suite for entry level housing. Have been 35% successful in getting zoning through. Do not have a housing authority. Have had a 30 unit apartment building and maybe a couple other affordable housing unit developments but have no authority to manage. They become subject to market forces presently. The hope is to get in a non-profit housing authority the valley. [Comox valley may include Courtenay and parts for the Comox-Stratcona Regional District]

Courtenay One of things Council [recently] approved is an affordable housing cost committee. The committee will work with community to define housing issues. The committee will look at role the city can play in affordable housing and what counts as affordable housing and what form we would want to support people living in.

CVRD Allowing for granny flats. Mostly addresses in the member municipalities were you can utilize pedestrian orientation.

Duncan Unfamiliar with any programs.

Ladysmith Currently have an affordable housing taskforce. Specifically have affordably housing objective in OCP. Do not have specific requirement in zoning bylaw for affordable housing. Are contemplating a smaller lot zone as a method of reducing cost of single family dwellings. Presently within the town private organizations, such as the Lions or Eagle, offer affordable housing for their membership.

Lake Cowichan Not at the moment. Years ago they had some low-cost housing go in but nothing since.

Lantzville No programs or bylaws. Area not dense and not affordable. [limited water supply likely impacting density]

Nanaimo There was an affordable housing strategy developed. Was not connected with it and not sure on present status. Giving of land. Not cash. Not directly involved. For one development, the [Name Deleted], received a $100,000 cash contribution for a public art piece, not to social housing.

North Cowichan Generous in allowing suites. No special program. Attempt to offer a variety of housing. Looking at an accessory dwelling like a granny flat. Used to have provisions for that looking to re-introduce. Study to look at housing options. Density bonuses or funding but nothing in place.

Qualicum We are offing [density] bonuses in OCP and zoning for special need or
Beach affordable housing. But nothing has really happened.

RDN Currently, not really. The closest thing that the Regional District would have for affordable house is related to encouraging development in urban nodes where the idea is that if you increase the density you may be able to reduce some of the housing prices.

15. Are you aware of any barriers to affordable housing within the jurisdiction?

Comox Do not have a non-profit housing authority. Only now being faced with the affordability issue in the last 2 or 3 years. A single family home from 1972 of 1800 sq feet a few years ago would go for $140,000; It was a scenario where multifamily could not compete. Houses with secondary suites were even seen as less of a value in the past. Relatively affluent citizens with a high desire to maintain what they have in terms of low density and large home on large lots. Now experiencing low vacancy rate, but that was not an issue until recently. Don't think there is a housing issue in terms of attracting workers.

Courtenay Courtenay has a very Limited rental market 1 to 2% vacancy. Really tough to find rental accommodation and rents going up as well.

CVRD Affordability is an issue for your main dwelling, for single family dwellings

Duncan Lack of raw land. Now down to strata subdivisions of existing residential lots. Pretty much a built environment.

Ladysmith Don't have the NIMBY issues as other places. Not terribly urban, population of approximately 7500. Some good number of older 3 story apartments, mostly geared towards seniors. Last 5 years geared towards market and not affordable. Market not responding to affordable housing need.

Lake Cowichan The prices keep going up.

Lantzville Lot size and no lack of available water. No water connection issued in the last 9 years.

Nanaimo Increasing housing costs.

North Cowichan I think there are barriers. Finding that people are moving here as it is more affordable then other places but may displace existing residents as people move in from higher value markets. New residential development of an apartment nature much of it being bought up people moving here from
other communities who have the money. Prices higher then what was
traditional in the neighbourhoods. People maybe displaced, particularly at
the lowest income levels. People already living in the neighbourhood may
be pushed out and there not and alternative for them yet. The influx of
people from high priced markets may be acquiring most of the housing that
might be seen as traditionally more affordable.

Qualicum Beach  Probably the NIMBY syndrome. Could get creative and do more but don’t
know if there is a strong demand for that from the general public or
Council. Encouraging higher densities with special needs, affordable and
seniors housing. No one is taking advantage of it relay for affordable
housing other than more units and may be that makes them more
affordable.

RDN  Well as a regional district it is difficult to include affordable housing in lots
of the rural areas because the region doesn't support high density
development for the most part.

16. What are the overall housing cost trends in the jurisdiction?

Comox  There going up. I opinion, they were artificially low compared to other
places. They have gone up and don’t see it going back. Well maintained
$140 four years ago $280 today. 1982 huge oversupply of land and market
tanks, lots sold at a loss. There is now a land supply crunch. Some huge
development proposed in the next 5 to 10 year span. Satellite communities
of 10,000 people in Union Bay getting approval yet there is more debate
over a 4 story apartment building in town then there is for a large 10,000
home development in a presently rural area.

Courtenay  We know prices went up 23% in last 12 months. Over last couple years,
last 3 years prices have gone up and up.

CVRD  In the last five years or so the prices have gone up in the last two or three
years affordability is an issue for single family dwellings. We are looking
at ways to hopefully address going beyond just allowing for multi-family.

Duncan  Astronomically increasing, but lagging behind big centres. Seeing people
moving up from Victoria looking for more affordable land and community.

Ladysmith  Spike. In the last three years doubled.

Lake Cowichan  The price keeps going up, sky rocketing. In bigger places mobile home
may be a cheaper way to go and more for seniors.

Lantzville  Increasing.
<table>
<thead>
<tr>
<th>Location</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nanaimo</td>
<td>In the last two years assessed values of land have doubled. Today I could not afford house that I have been living in for eight years.</td>
</tr>
<tr>
<td>North Cowichan</td>
<td>Similar to elsewhere on the island, it is going up. I can't quantify how much, but it's definitely going up. At different times have talk about if RV could be used to provide affordable housing but just haven't had the time to get there yet.</td>
</tr>
<tr>
<td>Qualicum Beach</td>
<td>Affordability definitely will be a huge problem. Feeling guilty for not doing something. But any time it has come up it has been pushed aside.</td>
</tr>
<tr>
<td>RDN</td>
<td>It's going up, quite substantially.</td>
</tr>
</tbody>
</table>

**Follow-up question via e-mail** Does the [jurisdiction] allow someone to temporarily reside in an RV while constructing a single family residence? And if so is there a time limit?

<table>
<thead>
<tr>
<th>Location</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Comox</td>
<td>[I am guessing the answer is no, but could you please confirm.] No we don’t allow it. The issue is addressed in section 5.11 of the zoning bylaw which is available on our website. Security trailers on large construction sites do not pose the same problem regarding non-removal after construction and therefore are not we typically do not enforce this provision in their case.</td>
</tr>
<tr>
<td>Courtenay</td>
<td>[Contact no longer available]</td>
</tr>
<tr>
<td>CVRD</td>
<td>Some zones do allow them to stay on site in a mobile while constructing up to a year while constructing [from original interview].</td>
</tr>
<tr>
<td>Duncan</td>
<td>[I am guessing the answer is no, but could you please confirm.] No. In the 10+ years I have been here I have never been asked that question by the public. Likely because we are a very urban setting.</td>
</tr>
<tr>
<td>Ladysmith</td>
<td>[No reply]</td>
</tr>
<tr>
<td>Lake Cowichan</td>
<td>When building house can have RV while building 18 months [from original interview].</td>
</tr>
<tr>
<td>Lantzville</td>
<td>[I am guessing the answer is still yes, but could you please confirm.]</td>
</tr>
</tbody>
</table>
You are right- you can live in an RV while building (there is a one year time limit, although I have not seen it enforced).

Nanaimo [I am guessing the answer is no, but could you please confirm.] You are right on this one – the answer would be that occupancy in a RV while constructing a SFD would not be allowed under the City’s zoning bylaw.

Interestingly, we do allow something called temporary or seasonal guest accommodation on SFD lots, but the primary use of the lot, the residence, must exist, for the accessory use to be allowed. Here is the clause for your reference:

Section 5.13.3. Land in any zone may be used for temporary seasonal guest accommodation. Temporary or seasonal guest accommodation is the accommodation of non-paying guests of the owner or occupier of the land in recreational vehicles where such use does not exceed 42 days within a calendar year.

Section 5.13.4. Temporary or seasonal guest accommodation does not include the renting or letting of recreational vehicles.

North Cowichan [I am guessing the answer is no, but could you please confirm.] You are correct, we do not permit an RV to be used during construction. There is a provision for a temporary trailer but it has to be a single wide and only on lots 2+ acres. We may have people sleeping out in construction shacks but we don't ask.

Qualicum Beach [I am guessing the answer is no, but could you please confirm.] Yes our bylaw does allow this. Must be for a security guard or watchman and RV must be removed at lock-up or 5 moths after building permit issuance.

RDN [I am guessing the answer is yes, but could you please confirm.] Yes the RDN allows RV occupancy while constructing for up to 2 year or occupancy, what ever comes first. If longer is needed then assessed on a case by case basis.
APPENDIX C – RV PARK AND CAMPGROUND SURVEY

The RV park / campground survey questions are as follows:

1. How many camping or RV spaces are available here? And are different types of spaces offered?
2. What are the rental rates?
3. Is there a maximum length of stay?
4. Typically what percentage of tenants are longer stay guests (6 month or more)
5. Are there any year-round tenants?
6. Do some RVs stay parked on a permanent basis?
7. Of those guests who are long-stay, of who would they typically consist?
8. What amenities and services are offered here?
9. What would be the typical disguising features between long-term guests and those that are more seasonal?
10. Have there been challenges due to local government regulation, especially with respect to long term guests?
11. Do you allow park model trailers? And, if so, are there any differences between the rules that apply to park models and RVs?
12. Are there any trends or changes with respect to long-term guests?
13. What would the range of RV-types used by long-term guests be?
14. Are there some types of RV that are more popular amongst different type of long term guests/ If so, please elaborate?
15. Is it possible to be introduced to a few long-term guests/tenants, if they are willing to meet with me?

1. **How many camping or RV spaces are available here? And are different types of spaces offered?**

RV Park A (Interviewed)
"150 sites, and there are different sites available. Like we have got long term sites and short terms sites and sites with park models on them Etc."

RV Park B
46 RV sites in total.
11 permanent trailer park spaces available on year round basis.
20 fully serviced sites with water, sewer and electric.
15 partially serviced sites with water and electric.
In addition, there are 17 hotel units and 21 cabins or other rooms.

RV Park C
116 RV sites in total.
In addition, there are 10 hotel units and 8 cabins.
RV Park D  114 RV sites in total.
77 fully services sites with water, sewer, electric, and cable.
17 partially services sites with water and electric.
20 non-serviced sites.
13 tenting sites.
10 mobile homes site.

RV Park E  41 RV sites in total.
26 fully serviced sites with water, sewer, electric and cable. 15 partial serviced sites with water and electric.
In addition there are 25 tenting sites, 10 self-contained cabins and a two-bedroom cottage.

RV Park F  30 RV sites in total.
30 fully serviced sites with water, sewer, electric and cable.
In addition there are 9 cabins.

RV Park G  38 RV sites in total.
38 fully serviced sites with water, sewer, electric, cable and telephone.

RV Park H  Not indicated.

RV Park I  96 RV sites in total.
60 fully serviced sites with water, sewer, electric and telephone.

RV Park J  Not indicated.

RV Park K  Not indicated, Over 50 acre site.
All sites fully serviced with water, sewer, electric and cable.

2. What are the rental rates?

RV Park A  "It depends on the site. [is there a range?]" $335 to right up to $700. [Is that like how close it is to the lake?] How close it is to the lake and the season and everything else like that."
Summer (July - August) $435- $700
Shoulder (May, June & September) $385 - $650
Winter (October - April) $335 - $470. Electric Extra.

RV Park B [Only daily rates provided]
$23 per day

RV Park C Summer (July – August) $550.
All other months $325 to 375.

RV Park D [Only weekly rates provided]
Summer $192 per week.
Winter $114 per week.
"Special long term rates are available. Please contact us for details."

RV Park E Summer (July – Aug) $450.
Shoulder (May, June & Sept) $350.
Winter (Oct – April) $280.
Electric extra.

RV Park F Summer $672 - $1008.
Shoulder $360 - $600.
Winter $300 - $400.

RV Park G Summer/Shoulder (May - Sept) $450.
Winter (Oct - April) $350.

RV Park H Monthly rates start at $290.

RV Park I Regular monthly rate:
Summer (April – September) $480.
Winter (October – March) $375.
Extended Term Special Monthly Rates:
"You pay the full monthly rate (as shown above) for the first 2 month - power is free up to $60. Then you go onto the rates below - you pay for the power you have used. We have meters on each pad, & read them at the end of each month."
Summer (May - Sept) $330.
Winter (Oct - April) $290.
Electric extra.

RV Park J Summer/Shoulder (May - Sep) $180 per week.
Winter (Oct - Apr) $150 per week.
"Please contact us for extended stay rates"

RV Park K Summer (July – Aug) $400 - $800.
Shoulder (May, June & Sept) $400 - $700.
Winter (Oct – April) $310 - $350.
Electric extra.
"Long Term Campers - We offer long term rates for campers who want to stay with us on a monthly basis, with a six month maximum stay."

3. Is there a maximum length of stay?

<table>
<thead>
<tr>
<th>RV Park A</th>
<th>No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Interviewed)</td>
<td></td>
</tr>
<tr>
<td>RV Park K</td>
<td>6 months.</td>
</tr>
<tr>
<td>All other RV parks</td>
<td>[Not indicated].</td>
</tr>
</tbody>
</table>

4. Typically what percentage of tenants are longer stay guests (6 month or more)?

<table>
<thead>
<tr>
<th>RV Park A</th>
<th>&quot;That varies, We have some tenants that are actually permanent. We have park model trailers and they are permanently here. And then we have those that are living in RV that have been here years. We have some that have been here six months. Have that just stay for the summer and some that just stay for the winter.&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Interviewed)</td>
<td></td>
</tr>
<tr>
<td>All other RV parks</td>
<td>[Not indicated].</td>
</tr>
</tbody>
</table>

5. Are there any year-round tenants?

<table>
<thead>
<tr>
<th>RV Park A</th>
<th>&quot;Yes we do.&quot;</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Interviewed)</td>
<td></td>
</tr>
<tr>
<td>RV Park B</td>
<td>Campground map indicates eleven sites designated as &quot;permanent trailer park available on a year round basis&quot;</td>
</tr>
<tr>
<td>RV Park C</td>
<td>RV- Monthly and half-year rates</td>
</tr>
<tr>
<td></td>
<td>Cabins - Monthly Off-Season Rentals available.</td>
</tr>
<tr>
<td>RV Park D</td>
<td>&quot;Special long term rates are available. Please contact us for details. …Consider a seasonal or long-term site with special long term rates and become one of our RV</td>
</tr>
</tbody>
</table>

RV Park E  RV Sites - Monthly rates where hydro not included
Cabins –" Off-season long term stays are available and
are popular for College students from nearby Malaspina
College with student discounts available."

RV Park F  Monthly rates
RV Park G  Monthly rates
RV Park H  Monthly rates
RV Park I  "Extended Term Special Monthly Rates."
RV Park J  Monthly rates and "Please contact us for extended stay rates"
RV Park K  "We offer long term rates for campers who want to stay
with us on a monthly basis, with a six month maximum
stay."

6. **Do some RVs stay parked on a permanent basis?**

RV Park A  (Interviewed)  Yes.

All other RV parks  [Not indicated].

7. **Of those guests who are long-stay, of who would they typically consist?**

RV Park A  (Interviewed)  Seniors.

All other RV parks  [Not indicated].

8. **What amenities and services are offered here?**

RV Park A  (Interviewed)  ● Beautifully Landscaped Grounds  ● Professionally Groomed Putting Green  ● Professionally Designed Tennis Court  ● Horseshoe Pits  ● Acres Of Park And
Lawn Areas  •  Gas Fired Fire Pit  •  Extensive Landscaping With Underground Sprinklers  •  Billiard Room With Shuffleboard And Darts  •  Large Lakefront Deck  •  Members Lounge And Card Room  •  "Wifi" For Internet Users  •  Two Auxiliary Lounges  •  Kitchen Facilities  •  Showers  •  Laundry Facilities  •  Fun Activities  •  Near Lake.

RV Park B
- water slide  •  heated outdoor pool in season  •  minigolf,  •  games area  •  convenience store  •  laundry facilities  •  hot showers all year round  •  Water  •  Sewer  •  Electric.  •  Beside river  •  within walk distance of Ocean.

RV Park C
- Restrooms With Hot Showers  •  Laundry Facilities  •  Pets Allowed  •  Clubhouse  •  Games Room  •  Exercise Room  •  Playing Fields  •  Man-Made Swimming Lake  •  Restaurant  •  Water  •  Sewer  •  Cable TV  •  Near Ocean.

D RV Park D
- Lots Of Trees And Shade  •  Large Grassy Pull-Thru Sites (Most Sites Are 50' Long And 25' Wide)  •  Camping Areas With Fire Pits For Tents And RV's  •  Heated Washrooms And Hot Showers  •  Store  •  Laundromat  •  Heated Pool (Seasonal)  •  River Swimming With Beach  •  Playground  •  Sandbox  •  Basketball  •  Volleyball  •  Badminton  •  Video Games  •  Darts Room  •  Horseshoe Pitches  •  Boccia  •  Free Wireless Internet Access (Wi-Fi)  •  LP Gas Delivered  •  Electric, Water, Sewer, Cable TV  •  Beside River.

RV Park E
- Games Room  •  Lounge Area  •  Washrooms And Hot Showers  •  Laundromat  •  Fire Pits With Wood Available  •  Shop On Site And Gas Station Nearby  •  Playground  •  Recycling Area  •  Sani-Station  •  Wireless Internet  •  Near Lake.

RV Park F
- Grassy Level Sites  •  Pets On Leash Permitted  •  Washrooms  •  Showers  •  Laundry  •  Store  •  Playground  •  Water  •  Sewer  •  30 Amp Electric  •  Cable TV  •  Beside Ocean.

RV Park G
- Each Site With Picnic Table And Fire Pit  •  Firewood For Sale  •  Water Taps Under Pressure  •  Hot Showers  •  Laundry  •  Wilderness Camping  •  Large Pull-Thru Sites Up To 90ft Long  •  Secure Compound  •  RV And Boat Storage  •  Water  •  Sewer  •  Electric  •  Cable  •  Telephone  •  5 Minute Drive To Beach.
RV Park H
- Park Models Welcome
- Pets Welcome
- Tenting Sites Available
- Quiet Shaded Or Open Sites
- Water
- Sewer
- Telephone
- Digital Cable TV
- Internet.

RV Park I
- Free Hot Showers
- Washrooms
- Laundromat
- Recreation Room
- Children Play Area
- Boat Moorage
- Water
- Sewer
- Electric
- Telephone
- Beside Ocean.

RV Park J
- Beautiful Country Setting
- Washrooms
- Showers (Coin Operated Showers)
- Laundry Machines (Coin Operated)
- Garbage Disposal And Recycling
- 30 Amp Electricity
- Water
- Sewer
- Cable TV
- Telephone
- All Pads Have Sea Views
- Adjacent To The Ocean And Mill Bay Nature Park.

RV Park K
- Office/Store
- Large Laundromat
- Hi-Speed Internet Access
- Kayak Launching Areas On Site
- Large Games Room
- Adventure Playground
- Basketball Court
- Washroom Facilities
- Hot Coin Showers, With Handicap Facilities
- Fire Rings
- Picnic Tables
- Over 50 Acres
- Ocean Views
- Sandy Sunbathing, Gravel Swimming Beach
- 30 Amp Electricity
- Sewer Hookups
- Sani-Dump
- Cable TV.

9. What would be the typical disguising features between long-term guests and those that are more seasonal?

RV Park A (Interviewed)
There really isn't one.

All other RV parks [Not indicated].

10. Have there been challenges due to local government regulation, especially with respect to long term guests?

RV Park A (Interviewed)
That one I couldn't answer.

All other RV parks [Not indicated].
11. Do you allow park model trailers? And, if so, are there any differences between the rules that apply to park models and RVs?

RV Park A (Interviewed) Yes and no. [Yes they allow park model trailers and there is no difference in rules.]

RV Park H "Park models welcome"

All other RV parks Not mentioned

12. Are there any trends or changes with respect to long-term guests?

RV Park A (Interviewed) "I honestly couldn't tell you, give you an accurate answer on that one. Cause like I have said I have only been here a week."

All other RV parks [Not indicated].

13. What would the range of RV-types used by long-term guests be?

RV Park A (Interviewed) "Varied as well. We have long-term in park models, we have long-term in 5th wheels, we have long-term in RV trailers, So it is just what ever they chose."

All other RV parks [Not indicated].

14. Are there some types of RV that are more popular amongst different type of long term guests? And if so, please elaborate?

RV Park A (Interviewed) "Nope, it’s a good mix."

All other RV parks [Not indicated].
15. Is it possible to be introduced to a few long-term guests/tenants, if they are willing to meet with me?

RV Park A (Interviewed) [Tempo of conversation indicated that it would be too much to ask.]

All other RV parks -
Appendix D – RV and Park Model Trailer Dweller Survey

The following survey questions were asked of the RV or park model dwellers:

1. How long have you stayed at this campground or when you were living in an RV how long were you living at that location?
2. How many months a year do you or did you live in your RV?
3. Do you or did you at the time own or rent a permanent dwelling?
4. Is there anything that you miss from living in a full-time dwelling?
5. What are the things about RV living that appeal to you?
6. What is your usual length of stay at a given campground?
7. How often do you change campgrounds or locations?
8. What are some the reasons why you have chosen to live in a RV?
9. What are the advantages and disadvantages to RV living?
10. Does or did your RV fulfill your housing need adequately?
11. Does or did your RV fulfill your housing need adequately?
12. Where are you originally from and why have you chosen to locate here?
13. Are you presently or were you at the time employed, retired or other?
14. May I ask what your annual income is or was it at the time? Or range or number?
15. What do or did you pay for rent here?
16. Is your RV paid in full?
17. At the time that you are/were living in an RV, what are/were your future plans with respect to housing?

1. How long have you stayed at this campground or when you were living in an RV how long were you living at that location?

Lucy 2 years [in RV resort campground].

Ethel 5 years [in RV resort campground].

Ricky 5 years [on own property]. [And at time you were living in it continuously? There was no break, you weren't moving it any where?] It wasn’t moving, we occasionally when off and house sat for people and then came back. We might be away from any where from 2 weeks to 3 months. [And this was about 5 years ago?] We lived in it for 5 years and finished living in it five years ago.

Wilma Own the yard. Live on the 5 acres for the last 4 years. 3 years and two moths in the trailer.
Fred

About 10 years ago. Lived in a tent down by the waterfront for 6 months then a year at brother-in-law's in a trailer.

Jack

Move in November first and were until march 1st, four years ago this mach for four months.

2. **How many months a year do you or did you live in your RV?**

Lucy

12 months of the year.

Ethel

12 month, full time.

Ricky

Mostly 12 months of the year.

Wilma

12 months.

Fred

6 months in tent and 11 months in trailer.

Jack

4 months [out of 4].

3. **Do you or did you at the time own or rent a permanent dwelling?**

Lucy

No.

Ethel

No.

Ricky

[No] That [the RV] was the main dwelling but we owned the property that it was on.

Wilma

No, but we were building.

Fred

No, that was it.

Jack

We were in the process of constructing a house.

4. **Is there anything that you miss from living in a full-time dwelling?**
Lucy: Yes. A little more space, particularity storage space.

Ethel: One thing at least a close line, because this is something I really liked a lot. This is because of the place that I live [the RV park]. If I had my own personal land then I would be able to have one. [Are there any other issues?] No.

Ricky: Yes, heat or lack there of. Also condensation, when you are sleeping 18 inches from the roof. Obviously storage space and yeah space.

Wilma: The kitchen and the bathroom.

Fred: Luxury like hot water and shower. Not a lot space

Jack: A real bathroom, proper heat, and space; those are about it. [What size of trailer?] a 24 foot.

5. What are the things about RV living that appeal to you?

Lucy: For us, because we are living on [near] the water, it is a beautiful setting. You have less maintenance. It is just a smaller way of living or size of living. Your housework is less, your costs are less, heating costs and light cost are less because it is a smaller space to heat and light.

Ethel: We have lived in a travel trailer before living here in this location. Or before when we started to live non-conventional? [I guess just in general the things about that type of living] When we first started to live in a travel trailer it was because we wanted to travel. Lived 26 months in a 26 foot travel trailer with our children. What appealed to us is that we can travel. [then In your current situation what would you find is the most appealing thing say compared to another type of living situation?] Well I would the cost.

Ricky: It was cheap. It was convenient because we were on our property. It made us be …we thought carefully before we acquired any thing.

Wilma: Little housework. Easy to just step out the door and go to work. We Didn't have to worry about coming inside with muddy shoes or dirty shoes too much. Like I say, there was no housework.

Fred: It was quiet.

Jack: It was different. It was kind of like an adventure. Like the rest of the family thought we couldn’t do it. Thought we would wimp-out. It was
treed all around, just somewhere different.

6. What is your usual length of stay at a given campground?

Lucy -
Ethel -
Ricky -
Wilma -
Fred -
Jack -

7. How often do you change campgrounds or locations?

Lucy We did twice. You own them [the camping space]. Had one first then bought another one moved on to it and sold the one we were in. [Is this a park model trailer] Yes.
Ethel 5 years, the last time we changed.
Ricky - [one time event]
Wilma - [one time event]
Fred - [one time event]
Jack - [one time event]

8. What are some the reasons why you have chosen to live in a RV?

Lucy That’s a darn good question. You know it was a just a novel way to live, for us we have always had a home as in a house a residential house. And it's just a different way of living a different style. People are very social; there are a lot of social activities that go in the park as opposed to living in a neighbourhood. It's kind of there for you and you can go to them if you want to, or not. It's a life style choice.
Ethel [opted out]

Ricky We didn't want to pay rent to anybody and we owned the property. We were able to save money. Get a decent down payment for building. [Kind of like a savings plan?] yeah.

Wilma We could move in it on to site. We could live right on site while we were building. So it was just a temporary, we new it was temporary. So that was easy because we could live right there, right were we were working. It was cheap to buy. Living on site it kept people from coming in and stealing building supplies.

Fred I had a dog. [So you couldn't live in an apartment?] Yeah.

Jack The Dog, We couldn't find at short notice a house that we could rent out with the dog. It was a necessity. What happened is we sold our house with the intend to buy another one and we couldn’t find one in time and we ended up wanting to build but by that time we were kind of stuck and we had to find a place. It was the only housing option open to us in our situation.

9. What are the advantages and disadvantages to RV living?

Lucy Kind of answered those in the previous questions really. There are good reasons to live in a house and good reasons to live in a trailer. It's really up to the individual, it’s a lifestyle.

Ethel Advantages for me is that very easy to clean; not as big as a regular house so it does not take as much time to clean the house. Also, another thing that I like is that since I don't have too much space in my house I can not accumulate items that I don't need. When we lived in Quebec left to go travel we had a big house it was the equivalent of 13 room with 3 bedrooms and we had a lot of space; but I like this one better now because we have only what we need, that’s all.

Disadvantages are that the heating system is very noisy. Like when it starts and it is functioning it makes quite a lot of noise. It is so noisy that at night we can not use it and we have to use the electrical system. Another disadvantage is that there is lots of dust that enters in to the trailer because it is so small. If we open the widows and the door you know, lots of dust. More than in a conventional house. Another thing is that we don't have any spare room for guests. It would be nice to have a special room for guests.
Ricky  In our circumstance we didn't move it. I can see there would be advantage to people if they owned the unit and it was their mode of transportation. Say living six months there and six months somewhere else. I would think that would be quite an advantage. The disadvantages would be the same that we found frustrating, the lack of space. Also, working for the organization that regulated zoning and building regulation I couldn't invite work colleges around. I was bending the rules.

Wilma  The advantage was it was a lot cheaper. We paid $2,200 for the travel trailer and then gave it away after 3 years. It was portable; we moved it to different locations on the 5 acres. The disadvantage was we had no decent cooking facilities or bathroom. We didn't have a place where we could sit like on a couch and relax. You couldn't really relax in it. In the winter you were confined to a really small space when you were in it. The summer time it was pretty good because you could be outside and sit in lawn chairs and that. But in the wintertime, when it was raining and cold and after work when were finishing working on the house you were trapped in this tiny little space. It was really hard that way. Then when it was cold we just had an electric heater in it so there was on time where it minus ten or fifteen for a week or so, we froze in there.

Fred  Close to the water, the ocean. Disadvantage, lack or luxury and no room.

Jack  For one it was cheap. We bought the trailer for like $1800 in the fall. Sold it in the spring for $4800. Made two-grand and that more then covered it. It was cheap.

10. Does or did your RV fulfill your housing need adequately?

Lucky  Again, the only thing is you are limited to size so of course you are limited to how much you can have in storage. You're limited to the amount of the dishes you can have. Your area space for making a meal for example two people its not bad but if you want to invite people over like have a dinner party its kind of hard, right. They would have to take turns sitting on the couch, I'm kidding, but it's not like having a formal dining room and having people over in that and entertain in that manner your entertaining in a totally different way. In the summer time, where you are more outside and you have a covered porch which we have you can expand out there to do your entertaining and kind of live out there.

Ethel  Yes.
Ricky  It is adequate but we tailored our life style around it.

Wilma  Yes, but we know we knew it was temporary. Like I would have been different if I had thought that we would be living in it for ten years. Actually it would have been different if I would have though that I would have been living in it for three years maybe, I don’t know.

Fred  -

Jack  I don't think I would have any trouble doing it again, but I think we made some mistakes when we bought it. We didn't know what to look for. We didn't realize that the furnace didn't work and stuff that that made it more difficult. We didn't have a skirt around it which would have helped keep the floor warm. If we did it again it would be with a bigger one and not have animals. It wasn’t' that bad. The stove worked, the oven worked, the plumbing worked the hot water worked could each have long shower. It was fine, it really wasn’t that bad. It was better in the summer time obviously but wasn't really that bad for a short time. I tell you one thing; If I was single with no pets I could live in a 24 foot trailer no problem. It would have been fine.

11. How would you describe yourself and what is your background and history?

Lucy  Am employed, but the majority of the people I see here are retired.

Ethel  -

Ricky  I don’t come from a white trailer trash background. Are you trying to get a demographic? [yes]
Upper-working lower-middle class for me and very similar for my wife. It worked for us. We didn't attach any social stigma to it because It was part of a grand plan for us. Like it was a stepping stone for us and we were on our way up.

Wilma  -

Fred  -

Jack  -

12. Where are you originally from and why have you chosen to locate here?
Lucy  The location on the water, the amenities.

Ethel  Form Montreal Quebec and have chosen this park because after we have traveled for more than a year in the United States we ended up here in BC. We visited Vancouver Island and visited Nanaimo and we had children living here in Nanaimo to see. Looked around Nanaimo to all the different park and this is the one that we like the most.

[There is two of you there right?] yes

Ricky  It was a family property. We had subdivided 5 acres off a larger family parcel. It was our choice because it was affordable to us and it was my wife ancestral home. I was new to the country so I was very happy to have that happen.

Wilma  Lived there to build a new house.

Fred  Mostly cheep rent and I had my dog.

Jack  [From local area. Temporary housing while building]

13. Are you presently employed, retired or other?

Lucy  Employed.

Ethel  Employed.

Ricky  At the time when I was moving on to there, which was 10 years ago I was unemployed and my wife was employed. Over the course of the five years living in there I gained employment and she remained employed but not in a full time capacity.

Wilma  Presently employed.

Fred  I was on welfare at the time.

Jack  Employed, both employed.

14. May I ask what your annual income is [or was at the time]? Or range or number?

Lucy  Higher than middle.
Ethel [Abstained]

Ricky At the beginning I guess it would have been for the two of us for the first year $25,000. At the end it would have been between the two of us $55,000.

Wilma Gross $54,000 each, $108,000 total.

Fred Approx. $500 per month, $6000 per year.

Jack Total income $90,000 between two.

15. What do or did you pay for rent here?

Lucy We don't, there is a like a tax [strata fee] we pay once a year to the resort and it's about the same as a house. Water is included, but we pay our own cable and they bill us every three months for electricity. Separate bill for electricity. [So you actually own the lot/space?] Yes, it’s a 99 year lease.

Ethel We don't pay any rent. [Is it like a lease?] No, we own it. [So it's a lot?] We own the lot and trailer. [Do you know what sort of price range something like that would go for?] The people that are renting here I am not sure. Eight years ago, when we stayed in our travel trailer for 6 months we paid $325. [Have there been any trailers on lots that have gone for sale?] Have no idea.

Ricky There wasn't a mortgage because we subdivided family property. We owned the property free hold. We were saving up to build a house. Because being a new immigrant I didn't have a credit history here and didn't have job when we first got here and my wife's income was not enough to get a decent mortgage to build a decent house. The motor home wasn't ours, so we did actually pay a small rent for the motor home to the person who owned it but wasn't using it. I don’t know if that counts as a mortgage or a rent but we probably paid I don’t know like a 100 buck a week. It was like a 21 or 23 feet with a double bed over the cab.

Wilma No Rent [Was paying mortgage on the property housing construction]

Fred Yeah it was $250 a month.

Jack It was like $200 a month to stay there and like $35 in hydro, they had a meter, and it came with free cable.
16. Is your RV paid in full?

Lucy Yes. [on a monthly basis or as a total Right] right now the water front ones [RV lot and trailer] have gone up quite a bit, there valued around I would say $200,000. That’s including your lot and what you have on it. Like we have a 40 foot park model. Just recently they have gone up quite a bit, an amazing amount really. That’s the waterfront ones and I mean we know of one that just sold for $227,000. If you were on the inside it might not be as much, I would be quite a bit less, maybe $130,000. They have a 99 year lease and a 25 or 30 lease and those would be less because they have less time on them.

Ethel Yes

Ricky Rented it.

Wilma Yes. [In answer in question 9: "we paid $2,200 for the travel trailer]]

Fred Was a small trailer, paid $500 for it.

Jack Yes, paid $1800.00 and sold it for $4800.

17. What are your future plans with respect to housing?

Lucy Will probably build a house next year and can keep it [the park model] for when we retire in 5 to 6 years. In that time can either use it or rent it out for as a vacation rental place to other people.

Ethel We don’t have any other plans for now. We are satisfied. We can not say never, but do not have a project to leave or do something different.

Ricky At the time they were to build a house on the property. [Built house and now is living in it]

Wilma [Moved in to house and gave RV away]

Fred [Today is employed, building a new house and getting married]

Jack [Moved into house]

Other Comments:
Lucy  Our thought being close to retiring. Have talks to a lot a people who are retired and live in the park and a lot of them are snowbird and do the same thing for 6 months in Arizona. The park models don't move. Several have a park model in Arizona and one here. Many people in the park. Some live in a fifth wheel and tow them down south. Not a bad way of living.

Ethel  Relating to living in a resort. Our relationship with our neighbours seems to me be to be different because we are in a small community. People talk to each other and care for each other. If we leave for a couple days we know our neighbours know about it. Also it is kind of more secure to be in that kind of resort. Most of the people are older then we are but most are retired and have more time.

Ricky  I can by my experience. It was, in our mind, a perfectly legitimate form of housing for the time that we needed it. It's a shame that sort of seems to be criminalized to live permanently or long-term in what is classified a temporary or re-locatable dwelling, because it works for people. We live in a motor home and people would assume that it was a mobile home and not clue in that a motor home is something that you can live in. Its no different for people that may choose to live on their sailboat moored at a yacht club. We were hook up to septic water and power. Had telephone coming in. Probably far safer then living on a boat.

Wilma  -

Fred  -

Jack  There was an old retired fellow who moved from camp ground to camp ground and lived there because he couldn't afford anything else. There were retired who had money where it was a life style choice. And a couple other that lived there on a more permanent basis. Compared to an apartment it is more private, more on your own and less money.
APPENDIX E – REFERENCE MAP
APPENDIX F – INFORMED CONSENT FORM SAMPLE

PARTICIPATION IN RESEARCH STUDY CONSENT FORM

Research Project Title: Understanding the Role of Recreational Vehicles and Park Model Trailers as an Alternative Housing Option and the Barriers to Their Use

Researcher: Blaine Russell

This consent form, a copy of which will be left with you for your records and reference, is only part of the process of informed consent. It should give you the basic idea of what the research is about and what your participation will involve. If you would like more detail about something mentioned here, or information not included here, you should feel free to ask.

Please take the time to read this carefully and to understand any accompanying information:

I. The aims of this research is to develop an understanding of the use of recreational vehicles and park model trailers as an alternative affordable housing option, to understand the reasons why individuals have made the choice to use this option, and to examine the barriers imposed, as well as those opportunities afforded, by local governments. In addition, as there is very little written on recreational vehicles (RVs) and park model trailers, it is an objective of this practicum to begin to fill this knowledge gap.

II. You will be asked 15 to 20 predefined questions that will form part of an interview. After the interview questions have been completed you will be asked if you would like participate in some additional open discussion. As part of this research project it is anticipated that you will be interviewed once; however, you may be contacted in the future for clarification.

III. No risk is anticipated that is greater than what one might experience in the normal conduct of one's everyday life normally. However, living in a recreational vehicle or park model trailer may be contrary to the regulations of the local government and the disclosures of specific information could, while highly unlikely, result in a local government choosing to enforce its regulations; therefore, the identity of individuals and campground will be kept confidential. In addition, local government interviews will be conducted first in order to further reduce the risk of any accidental disclosure of information.

IV. A cassette tape recorder and / or solid-state digital audio recorder will be used during your interview to record your response. Your response will be transcribed and may be quoted or paraphrased within the research report.
V. Your confidentiality is of the utmost importance and will be maintained throughout the project. Where it is necessary to attribute a quote or paraphrase information only a pseudonym (made-up name) will be used; this is to ensure that your individual identity is not made public. Only the jurisdiction in which you are located may be disclosed in order that inter-jurisdictional comparisons can be made. All collected data, including audio recordings, will be stored electronically in a password protected folder to maintain and protect confidentiality. The master list that links your real identity with your pseudonym will be destroyed upon the completion and acceptance of the practicum report to the faculty of Graduate Studies. Every effort will be made to guarantee your confidentiality. Your real name will not be revealed within the report and any quote or paraphrase referenced will only be attributed to your pseudonym.

VI. You will be provided feedback, in the form of a thank-you letter that includes a summary of the results of the research. The letter will direct you to a full electronic version of the research report and information will be provided on how a hard copy of the research report can be made available for your viewing.

VII. There is no credit or remuneration for participation in this research study.

Your signature on this form indicates that you have understood to your satisfaction the information regarding participation in the research project and agree to participate as a subject. In no way does this waive your legal rights nor release the researchers, sponsors, or involved institutions from their legal and professional responsibilities. You are free to withdraw from the study at any time, and/or refrain from answering any questions you prefer to omit, without prejudice or consequence. Your continued participation should be as informed as your initial consent, so you should feel free to ask for clarification or new information throughout your participation. Please feel free to contact:

- Blaine Russell (researcher) by telephone at (XXX) XXX-XXXX
- Ian Skelton (supervisor) by telephone at (XXX) XXX-XXXX

This research has been approved by the Joint-Faculty Research Ethics Board of the University of Manitoba. If you have any concerns or complaints about this project you may contact any of the above-named persons or the Human Ethics Secretariat at XXX-XXX, or e-mail XXXXXXXXXXXXXXX@XXXXXXXX.XX. A copy of this consent form has been given to you to keep for your records and reference.

Participant’s Signature                                                  Date

Researcher’s Signature                        Date