



CORPORATION OF THE CITY OF VERNON

AFFORDABLE HOUSING ADVISORY COMMITTEE

SEPTEMBER 9, 2022, AT 3:00 PM

OKANAGAN ROOM (COUNCIL CHAMBER) CITY HALL

A G E N D A

1) CALL TO ORDER

2) LAND ACKNOWLEDGEMENT

As chair of the City of Vernon's Affordable Housing Advisory Committee, and in the spirit of this gathering, I recognize the City of Vernon is located in the traditional territory of the Syilx people of the Okanagan nation.

3) ADOPTION OF AGENDA

4) ADOPTION OF MINUTES

a) August 10, 2022 (Attached)

5) NEW BUSINESS

a) Current Focus and Update presentation, Andrea Manifold, Habitat for Humanity Okanagan, being presented by Glory Westwell (*Time allotment: 20 minutes*)

b) Draft Housing Action Plan - review and discussion

6) NEXT MEETING

November, 2022 – to be confirmed

7) ADJOURNMENT



THE CORPORATION OF THE CITY OF VERNON

MINUTES OF THE AFFORDABLE HOUSING ADVISORY COMMITTEE HELD WEDNESDAY, AUGUST 10, 2022 COUNCIL CHAMBERS (OKANAGAN LAKE ROOM) CITY HALL

PRESENT: Annette Sharkey, Social Planning Council of North Okanagan
Jayme McKillop, Community at Large Rep.
Councillor Gares, Council Appointed
Councillor Fehr, Chair
Zuni England, Community at Large Rep.
Glory Westwell, Habitat for Humanity Rep.
Chuck Winn, Builder Rep.
Tyler Baker, Director of Regional Development, BC Housing
(Alternate)

GUEST: Brett Bandy, Real Estate Manager
Andrea Manifold, CEO Habitat for Humanity Okanagan

ABSENT: Councillor Britton, City of Armstrong
Nanette Drobot, Supportive Housing Advisor, BC Housing
Megan Thorne, Interior Health

STAFF: Roy Nuriel, Planner, Economic Development
Barbara Everdene, Long Range Planner
Laurie Cordell, Manager, Long Range Planning & Sustainability
Jennifer Pounder, Committee Clerk

ORDER The meeting was called to order at **3:00 PM**

**LAND
ACKNOWLEDGEMENT** *As Chair of the City of Vernon's Affordable Housing Advisory Committee, and in the spirit of this gathering, I recognize the City of Vernon is located in the traditional territory of the Syilx people of the Okanagan Nation.*

**ROUND TABLE
INTRODUCTIONS** Before the start of the meeting round table introductions were conducted and new members were welcomed by the Chair.

ADOPTION OF THE AGENDA

Moved by **Councillor Gares**, seconded by **J. McKillop**:

THAT the agenda of the August 10, 2022 meeting for Affordable Housing Advisory Committee be adopted:

CARRIED

ADOPTION OF THE MINUTES

Moved by **G. Westwell**, seconded by **J. McKillop**:

THAT the minutes for the June 29, 2022 meeting of Affordable Housing Advisory Committee be adopted:

CARRIED

CITY-OWNED LAND

B. Bandy, Real Estate Manager, was in attendance and provided a presentation regarding the available land owned by the City of Vernon.

6400 OKANAGAN AVENUE

- This is a 70 acre lot.
- The Committee inquired as to how many units could be built on the 20 acres.
 - The current zoning is CE4 which allows for a density of 12.5-18 units per acre.

4000 MUTRIE ROAD

- This property was formerly a water reservoir and is currently vacant.

31ST AVENUE and 29TH STREET

- This property is currently a gravel parking lot.

CITY OF VERNON HOUSING IMPLEMENTATION STRATEGY WORKSHOP

L. Cordell, Manager, Long Range Planning and Sustainability, and **B. Everdene, Long Range Planner** were in attendance and ran a workshop with the committee.

- Vision – Three Words Exercise
- Community Statistics

- Vernon has 10,000 SFD lots ready for development; we need more multi-family dwelling lots to be development ready (zoning/servicing in place)
- 2300 units backlog of affordable housing
- 200 new units per year needed
- Roundtable workshop on the following Strategic Directions and Actions:
 - Increase the supply of rental housing
 - Increase diversity, supply and affordability of market housing
 - Acquire land for affordable and attainable housing
 - Partner in the delivery of affordable/supportive housing
 - Educate, communicate and build relationships

INFORMATION ITEMS:

REQUEST FOR DELEGATION

Moved by **A. Sharkey**, seconded by **J. McKillop**,

THAT a Request for Delegation be approved for Andrea Manifold, Habitat for Humanity Okanagan, to appear before the Committee at a future date to be coordinated by the Committee Clerk:

CARRIED

NEXT MEETING

The next meeting for the Affordable Housing Advisory Committee is set for Friday, **September 9, 2022** at **3:00 PM** in Council Chamber (Okanagan Room) at City Hall.

MOTION TO ADJOURN

Moved by **J. Sharkey**, seconded by **A. McKillop**:

THAT the meeting of the Affordable Housing Committee be adjourned:

CARRIED

ADJOURNMENT

The meeting of the Affordable Housing Committee adjourned at **5:05 PM.**

CERTIFIED CORRECT:

_____ Chair



Habitat for Humanity®

Okanagan

**Vernon Affordable Housing
Committee**

Presented by Glory Westwell

September 9, 2022

Habitat provides people with the tools to take care of themselves and build their own futures, through affordable home ownership.





Social Housing

Rental Housing

Affordable Homeownership

Market Homeownership

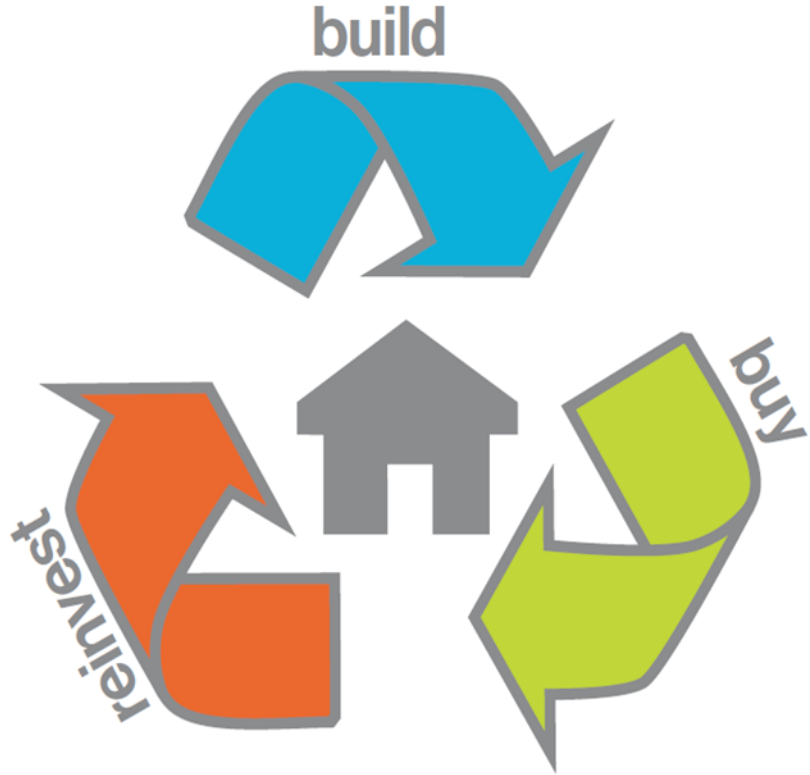
How we work

People in your community and all over the world partner with Habitat for Humanity to build or improve a place they can call home.

Habitat homeowners help build their own homes alongside volunteers and pay an affordable mortgage, which is then reinvested to build more homes.

With our help, Habitat homeowners achieve the strength, stability and independence they need to build a better life for themselves and their families.

How Habitat for Humanity Okanagan works



- **build:** For warranty purposes builders now construct homes to drywall stage. Habitat site staff and volunteers with community support and help from the future home owners complete the homes.
- **buy:** Habitat homeowners make payments against the mortgage geared to their income.
- **reinvest:** Mortgage payments are invested back into Habitat to help more families

Habitat homeowners volunteer 500 hours and pay an affordable mortgage – geared to their income – to buy their home.

-1 person working full time in the family

-Lived in the Okanagan for at least 2 years

-Income requirements for specific areas (\$50K in Vernon)

In order to qualify for Habitat homeownership, prospective homeowners must demonstrate that they are:



A Hand Up Not a Hand Out

Entering the Program

Thorough review of family financial status

- Income must be within limits set by BC Housing Income Limits (HILs)
- Debt & credit scores reviewed and must be within acceptable range
- Total debt ratio must not exceed 42%
- Able to pay a mortgage, property taxes & strata staying within 30% of gross household income
- Income is reviewed every year and principle payments adjusted
- **New for 2022 a first mortgage with a 10 year amortization is provided by a credit union, 2nd mortgage for the balance is a Habitat interest free mortgage, paid concurrently within 30% limit and continues after 1st mortgage is paid**

Exiting the Program

- Accumulated property value is predetermined at 2% per annum regardless of market growth
- A program fee is paid to Habitat of 10.5% of total principle payments made by homeowner to support administration of program
- Equity growth is shared, this split enables Habitat to provide more affordable homes

By the end of 2023 42 homes built. Successful projects are located in Kelowna, Vernon, Lake Country, Peachland and West Kelowna.



Family Education

We partner with Launch Okanagan to provide a mandatory money management program.

Modules include:

- Relationship with money
- Consumerism
- Budgeting
- Banking & Financial Services
- Saving & Investing
- Credit & Debt Management

Ongoing support is available to families that need assistance.



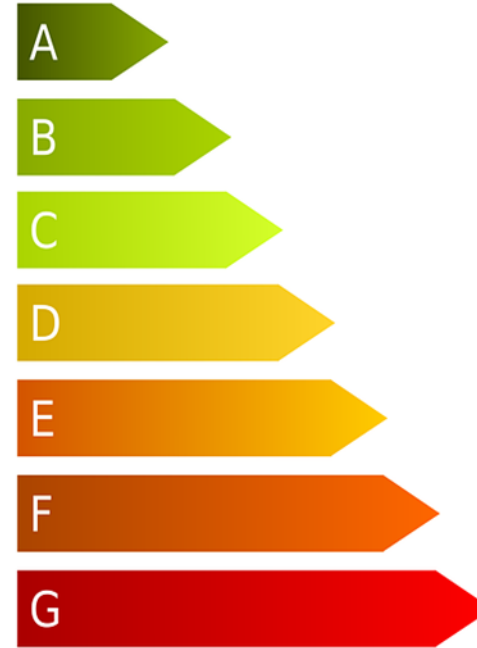
- **Lake Country Project**

- Habitat for Humanity Okanagan is constructing twelve multi-family units with four buildings at Powley Court, Lake Country
- First 8 units are almost complete
- Remaining 4 complete in 2023
- Total build including land \$5,360,000
- BC Housing funds \$450k received, \$150k in progress
- CMHC funds \$800k received \$200k in progress
- Bequest received in 2020 of \$900K
- ReStore contribution, fundraising, gift in kind and accumulated funds make up the rest



High Efficiency Homes

- Pre construction energy modelling
- Post construction energy testing reports
- Certified by Natural Resources Canada
- Triple glazing
- High efficiency furnaces
- Upgraded water heaters
- Upgraded R values
- Radon protected



ReStore Operations

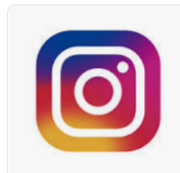
- Four locations: Vernon, Kelowna, West Kelowna, Penticton
- Diverted almost 19M pounds of waste to date
- 30 staff in the stores
- Inventory relies on donated items and kitchen salvages
- The ReStore program is 100% self sustaining and also covers overhead for 5 FTE office staff and administration costs
- Excess ReStore revenues - approximately 10% goes towards build program



Expansion Goals

- Working with developers to incorporate affordable housing in their plans
- Sourcing land development opportunities
- Working with federal, provincial and municipal levels of government to increase funding
- Raising our profile as an affordable housing provider
- Consistently serving families in need of safe and affordable homes

Please follow us on social media



Thank you!

Open discussion forum.


Contact **778-755-4346**

Andrea Manifold, CEO ext 208
andrea.manifold@hfhokanagan.ca

City of Vernon Housing Action Plan

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INTRODUCTION

Access to housing is critical for the social and economic wellbeing of the community. There is currently a severe lack of housing across the province and Vernon is feeling the impact across the majority of income levels and demographics. The housing crisis requires immediate action, and a continued commitment to longer term solutions in the years to come. The City has been focused on affordable and attainable housing since 2008. While housing demand and the housing crisis has only intensified, the good news is that Vernon has a strong foundation of policies and partnerships in place.

The Vernon Housing Action Plan (HAP) draws direction from the recent plans and experiences of community partners, non-profits, the Regional District of North Okanagan and the City. It integrates the outcomes of Council's Strategic Plan and feedback from the City's Affordable Housing Advisory Committee. The HAP is meant to bring all the information and strategies appropriate for Vernon into one document. Timelines for implementation would be considered in conjunction with dedicated human resources available to implement housing strategies and actions.

Housing in Vernon needs to be diverse in type, size and pricing, and accessible and inclusive, with enough units that are "affordable" and "attainable" throughout the community. What do these words mean?

Affordable housing is targeted to low/average income households, such as those who earn minimum wage or individuals who are receiving government assistance such as seniors or people with a disability. Affordable housing is generally rental housing and can include additional supports for the people living there. It is typically government subsidized housing.

Attainable housing is targeted to average/medium income households who have been priced out of the market or are struggling with higher rents. Attainable housing may be rental market housing or homes with smaller units or homes on smaller lots for purchase. It is typically market housing.

Successfully implementing the HAP will require support from various levels of government, non-profits and the development community.

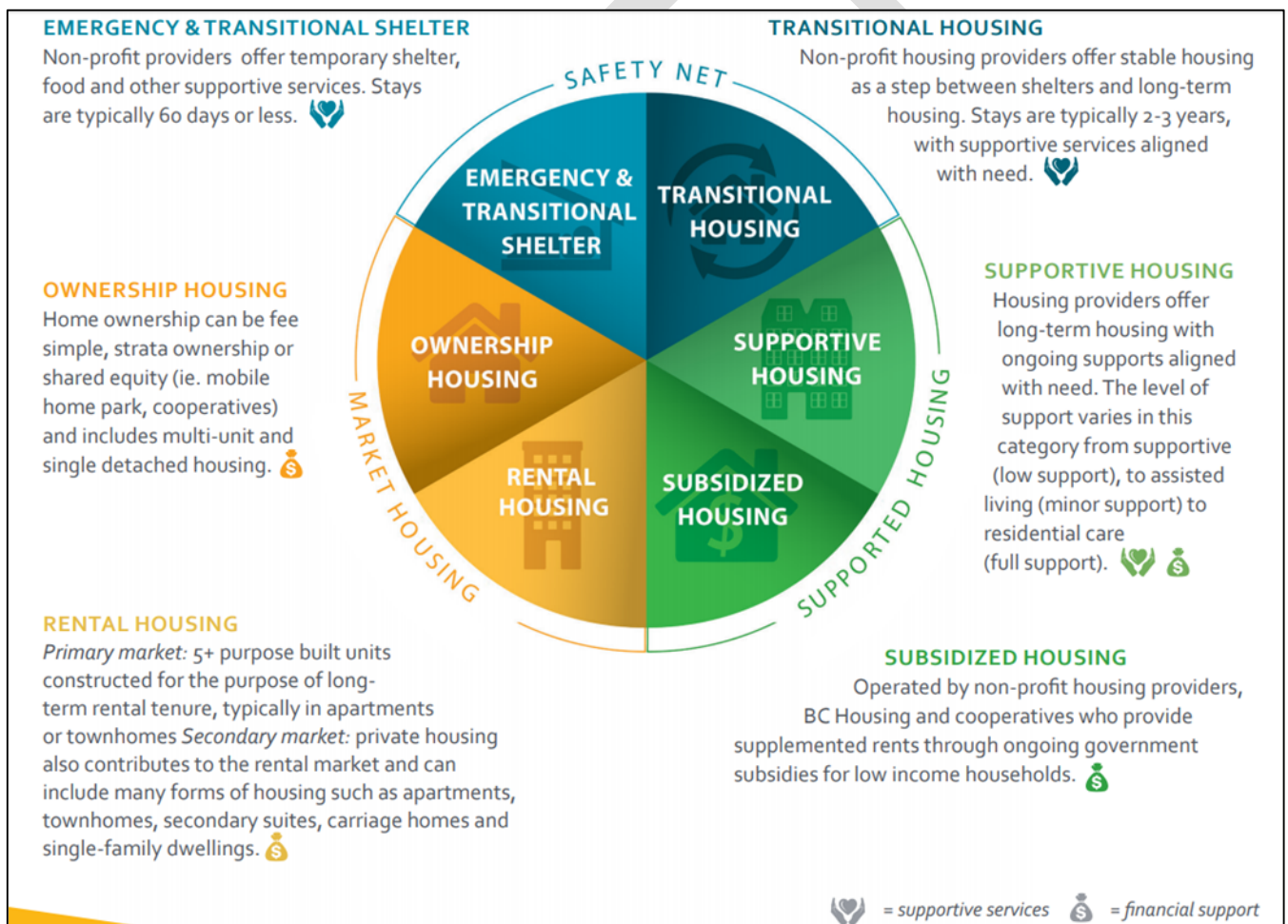
THE HOUSING WHEEL

The housing wheel shown in Figure 1 demonstrates the range of housing options to meet the needs of households of all income levels, extending from emergency shelter

and housing for the homeless through to affordable rental housing and home ownership. Households may move across the various housing categories shown on the wheel throughout their lives.

Since most community housing needs are met through the private sector, this Plan recognizes the need to encourage more attainable market housing (i.e. non-subsidized affordable rental housing and attainable home ownership). This Plan is intended to be a companion Plan to the 2019 Homelessness Strategy which focuses on meeting both safety net and supported housing needs, as shown on Figure 1¹, below.

Figure 1: The Housing Wheel



¹ This diagram is featured in the 2019 Moving Forward: Building Homes, Strengthening Community: Vernon Housing and Homelessness Strategies, coordinated by the Social Planning Council of the North Okanagan. The housing wheel diagram was developed by the City of Kelowna.

THE CHALLENGE

Housing affordability was identified as the most significant challenge during the development of the 2020 [North Okanagan Regional Housing Needs Assessment](#). Since then, housing demand and the housing crisis has intensified. Addressing affordability is complex and will require action from various levels of government, non-profits and the development community. The lack of availability of diverse housing options impacts housing affordability.

The Housing Needs Assessment included background information on the state of housing in Vernon as well as the region. The Assessment helped to quantify Vernon's **core housing need**. This term indicates the number of households that require housing but do not have sufficient income to afford to rent or own a home currently available on the market. To meet core housing need, some form of assisted non-market affordable housing is typically required. This includes constructing social or affordable housing as well as providing assistance to help cover the cost of housing. The information below further defines the challenges the community is facing:

- Vernon is experiencing a sustained moderate population growth of 1.4%, which is expected to continue. In the 2021 census, Vernon had a population of 44,519. Growth is projected at 200 households per year, for another 1,000 new households between 2022-26, and another 2,375 households between 2026-36;
- Vernon has a disproportionate share of the region's core housing need (60%). There are approximately 2,330 households in core housing need, that require housing but do not have sufficient income to afford to rent or own a home currently available on the market. It is estimated that core housing need will expand by a further 29 households annually from 2022-26;
- Vernon has an ageing population, with one-third of owners and one-quarter of renters over the age of 65. The largest age group within the region is 45 to 64 years; singles aged 45-64 are the largest age group in need, followed by singles over 65;
- There is a significant and increasing gap between housing prices and household incomes needed to achieve homeownership. Median incomes of both renters (\$33,000) and owners (\$73,200) are lower in Vernon than the regional medians;
- There is not enough rental housing to meet current need; the overall rental vacancy rate is 0.7%, well below a healthy rate of 3%;
- Only 12% of existing rental units are affordable (i.e. less than 30% of the median renter income). One in three renters is in core need (33%), and most renters are spending over 30% of their income on housing; and

- There is currently a backlog of not enough non-market/social housing to meet current need, with the number of households on waitlists for units growing.

This information demonstrates some of the reasons why, despite efforts to address this problem, there continues to be a larger demand for housing than there is supply and a mismatch between the supply and the need for smaller and more affordable units.

RECOMMENDED STRATEGIC DIRECTIONS

The Housing Action Plan builds on Vernon Housing and Homelessness Strategies (2019), the Regional District of North Okanagan’s Housing Needs Assessment (2020), the Regional District of North Okanagan’s Regional Housing Strategy (2021). It also incorporates input from the Affordable Housing Advisory Committee and additional action items to address the need for housing in the community. In summary, the HAP highlights five strategic directions, specific to our community:

1. Increase the supply of rental housing
2. Increase diversity and affordability of market housing
3. Acquire land for affordable and attainable housing
4. Partner in the delivery of affordable and attainable housing
5. Educate, communicate and strengthen relationships

Several of the recommendations require detailed analysis and consideration by Council. Each of these directions has key actions that will help to guide the City in working to address housing concerns over the next several years. These actions are summarized in Table 1, below.

Table 1: HAP Actions

Strategic Direction	Action	2019 Vernon Housing Strategy	2021 RDNO Housing Strategy	Indicator
ALL	0.1 Create a full-time permanent position for a housing planner to implement policy changes, streamline and accelerate the review of affordable and attainable housing projects, conduct educational programming and build relationships		✓	Position created and person hired

Strategic Direction	Action	2019 Vernon Housing Strategy	2021 RDNO Housing Strategy	Indicator
1. Increase the supply of rental housing	1.1 Explore zoning amendments and additional incentives to accelerate the development of new rental housing	✓	✓	Number of new rental housing units built per year
	1.2 Reduce barriers and incentivize the construction of new secondary suites and secondary dwellings, including allowing suites in semi-detached dwellings	✓	✓	Number of new secondary suite and secondary dwelling permits per year
	1.3 Consider requiring new construction to be secondary suite ready		✓	Number of new builds with suite ready plumbing and wiring per yr
	1.4 Develop and distribute free pre-designed secondary dwelling plans that meet bylaw requirements and are building permit ready			Number of Building Permits issued for the pre-designed plans
	1.5 Regulate short term rentals to reduce their impact on long term rental inventory	✓		CMHC rental vacancy rate
2. Increase diversity and affordability of market housing	2.1 Explore zoning amendments to support affordable home ownership and rental, including floor space ratio density zoning, small lot subdivisions, minimum home size and tiny house zoning, rental zoning, zoning for manufactured homes, and apartment lock off units ²	✓	✓	Number and average/median cost of affordable home types (tiny homes on small lots, units in rental zones, manufactured homes, apt. lock off units)
	2.2 Explore requiring a portion of new development to be affordable/attainable as part of rezoning processes	✓	✓	Number of rezoning applications involving community

² A lock-off unit or suite is a dwelling unit within an apartment with a separate lockable entrance access to a shared common hallway which can be locked-off from the rest of the apartment.

Strategic Direction	Action	2019 Vernon Housing Strategy	2021 RDNO Housing Strategy	Indicator
				amenity contributions for affordable/ attainable housing or inclusionary zoning per year
	2.3 Review existing incentives and explore additional incentives (DCC rebate, housing agreement process, fast-tracking, parking variances, tax incentives, grants)	✓		Number of incentives for affordable/ attainable housing per year
	2.4 Understand the business case for attainable market housing and work with the development community to increase uptake	✓		Number of presentations/ workshops and attendees (e.g. DAPR DWG)
3. Acquire land for affordable and attainable housing	3.1 Develop and implement a Land Acquisition Strategy that a) maps out priority areas for future land acquisition by the City, b) identifies revenue sources for land acquisition (municipal, federal and provincial) and c) explores innovative financing options	✓	✓	Ha of City land set aside for the purpose of affordable/ attainable housing Number of new affordable and attainable housing units on City land
	3.2 Advocate to senior levels of government for financial support, surplus institutional land or other resources and assistance for affordable housing	✓	✓	Number of grant applications and total amount requested per year Total amount funded per year
	3.3 Make City-owned lands development ready in terms of assembly, zoning and servicing			Number of parcels readied for affordable housing in terms of assembly,

Strategic Direction	Action	2019 Vernon Housing Strategy	2021 RDNO Housing Strategy	Indicator
				zoning and servicing
4. Partner in the delivery of affordable and attainable housing	4.1 Support build-out of land already acquired for affordable and attainable housing, leveraging assistance from the Affordable Housing Reserve Fund (AHRF)	✓	✓	Number of new non-profit (government supported) affordable and attainable units AHRF disbursements
	4.2 Explore fast-tracking and reduced bylaw requirements for non-profit housing development, including reduced parking requirements based on location, housing type, proximity to transit, etc.	✓		Number of new non-profit housing starts
	4.3 Collaborate with Social Planning Council of the North Okanagan (SPCNO) – Housing First and other initiatives (e.g. 2019 Homelessness Strategy)	✓	✓	SPCNO report card on 2019 Strategy indicators
	4.4 Collaborate with RDNO and communities in the North Okanagan as appropriate on housing research and affordable/attainable housing development	✓	✓	RDNO report card on 2021 Strategy indicators
5. Educate, communicate and strengthen relationships	5.1 Work to build understanding in the community about the importance of having diverse housing types to build acceptance of affordable/attainable housing projects	✓	✓	Number of public engagement events and attendees
	5.2 Communicate with the community and developers about what the City is doing/offering	✓	✓	Number of public engagement events and attendees;

Strategic Direction	Action	2019 Vernon Housing Strategy	2021 RDNO Housing Strategy	Indicator
				Webpage analytics
	5.3 Continue to build relationships and partnerships at all levels (provincial, regional, non-profit, development stakeholders)	✓		Number of Council resolutions re: affordable housing funding opportunities and initiatives

PERFORMANCE

Each action in the plan includes a measurement of success. At a high level, the success of this affordable and attainable housing plan will be measured by:

- overall community housing stock diversity
- number and diversity of new builds
- change in the annual vacancy rate
- number of new rental units coming into the community rental supply
- number of building permits for secondary suites
- number of relevant housing applications and processing timelines
- uptake of incentives and initiatives

These measurements will be reviewed annually and an affordable and attainable housing report card shared with Council and the community.

CONCLUSION

The housing crisis requires immediate action, as well as a continued commitment to longer term solutions in the years to come. The City has been focused on affordable housing since 2008, so there is already a strong foundation of policies and partnerships in place, but there needs to be continued efforts to meet the increasing needs of the community at a variety of income levels and housing types. The challenge is significant and the City is only one player. However, by working together, we make change happen. The HAP is the City’s roadmap to increasing action and focus to support our community to achieve housing for all.

APPENDIX 1 - WHAT HAS BEEN DONE ALREADY?

Summary of Vernon's Housing Action 2008 – 2022

The City of Vernon's first Attainable Housing Strategy was launched in 2008 with the majority of recommendations completed, including:

- Encouraged secondary suites through zoning, a more streamlined process and elimination of fees.
- Restructured the way the City charges infrastructures costs to new development (Development Cost Charges), including waivers for affordable housing.
- Implemented the Rental Housing Incentive Grant to assist with development cost charges for market rental units.
- Strengthened the Strata Conversion Policy to protect existing rental housing.
- Provided land and partnered with local housing non-profits and BC Housing for new affordable and attainable units.
- Implemented a program to exempt homeowners from taxes for a fixed period if building in the City Centre District (Revitalization Tax Exemption Program).
- Use of Housing Agreements to increase density for more affordable and attainable units.

Affordable and Attainable Housing was one of the key priorities in Council's Strategic Plan 2019 – 2022. Through this plan, many actions were undertaken, as follows:

2019	<ul style="list-style-type: none"> • Commenced short term rentals policy/bylaw consultation • Investigated and pursued opportunities for affordable/attainable housing partnerships, as appropriate • Identified available parcels of land in advance of the Spring 2020 BC Housing call for funding • Completed lease and housing agreement for 4005 Pleasant Valley Road in partnership with BC Housing and Vernon and District Land Trust • Participated in provincial review of development requirements • Worked with RDNO to oversee regional housing assessment
2020	<ul style="list-style-type: none"> • Worked with RDNO on a Regional Housing Strategy to ensure City needs are reflected • In conjunction with Social Planning Council, investigated potential City owned lands for affordable housing • Worked with BC Housing and other agencies on project development • Investigated and pursued opportunities for affordable/attainable housing partnerships, as appropriate

2021	<ul style="list-style-type: none"> • Assessed residential development approval process and identified areas to streamline • Completed review of impediments to secondary suites and carriage homes • Worked with BC Housing and other agencies on project development • Investigated and pursued opportunities for affordable/attainable housing partnerships, as appropriate • Continued to proactively identify lands to develop affordable housing
What we are still finishing	<ul style="list-style-type: none"> • Complete implementation of development process review recommendations • Zoning bylaw amendments to allow secondary suites in semi-detached dwellings • Develop short term rentals policy/bylaw for Council's consideration • Develop public materials to increase awareness of development processes and timelines • Integrate outcomes of housing needs assessment into Housing Strategy Implementation Plan • Reviewing impediments to tiny homes
This plan addresses	<ul style="list-style-type: none"> • Adopt Housing Strategy Implementation Plan • Implement Housing Strategy Implementation Plan priorities

APPENDIX 2 - WHO IS INVOLVED IN ADDRESSING HOUSING?

Improving the housing situation in a community takes many people working at many different levels. There are roles for federal, provincial and local governments as well non-profit housing providers, developers and builders. Individual home owners also have a part to play.

Partner	Role
Canada Mortgage and Housing Corporation (CMHC)	Financing, funding, information, research, education, incentives
BC Housing	Funding affordable and attainable units, supportive housing, rental supplements, education, information
City of Vernon	Regulation, reviewing applications, policy direction, education, provision of land
Housing Non-profits	Securing grants, developing and operating affordable and attainable housing
Developers and Builders	Developing and building more multi-family units and purpose-built rentals, input on policies and regulations that encourage affordable and attainable housing
Home Owners	Adding secondary suites and carriage houses, providing long term rentals

This housing action plan builds on the work the City of Vernon has been doing since 2008 to improve access to safe, affordable and attainable housing that meets the needs of Vernon residents.

APPENDIX 3 - RESOURCES

Over the last few years, the City of Vernon has partnered and provided input into the following housing research and planning documents:

- 2019 Moving Forward: Building Homes, Strengthening Community: Vernon Housing and Homelessness Strategies – coordinated by the Social Planning Council, this document conducted a review of policies and programs related to housing and homelessness in Vernon since 2008 and provided recommendations for further actions to address homelessness and increase affordable and attainable housing.
- 2020 [North Okanagan Regional Housing Needs Assessment](#) – a regional effort to identify the main housing challenges for different income levels and demographics and to quantify housing requirements.
- 2021 [North Okanagan Regional Housing Strategy](#) – using the data from the Housing Needs Assessment, the document outlines actions that are intended to increase affordable and attainable housing in the region.

These documents were used as the foundation of the HAP and are important resources. In addition, the following documents provide history and context:

- 2013 Vernon Housing Needs Assessment
- 2007 Building Bridges Strategy
- 2007 Attainable Housing Strategy

APPENDIX 4 – 2019 VERNON HOUSING AND HOMELESSNESS STRATEGIES

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**APPENDIX 5 – RDNO REGIONAL HOUSING NEEDS ASSESSMENT
(VERNON COMMUNITY PROFILE)**

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APPENDIX 6 – RDNO HOUSING STRATEGY

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