The Recommendations of the Manitoba Association of Short Term Rental Owners for fair, effective and common-sense regulation remain:

1- Accomodation Tax - this is necessary to bring revenue into our city we support this (keep in mind Toronto is 4% not 5%).

2-Licensing and fair Regulation - You just need to know who these STR hosts are, where they are located and what they are up to. A two tiered licensing cost for primary residence vs secondary residences works. The price quoted for Primary residence makes sense but the $500 for secondary residences is higher than it is in all other Canadian cities except for Kelowna. This creates a barrier to entry for those without the means to do so and unfairly biases those with extra disposable income.

3-Criminal Background check - Whenever you have a business that is client-facing this should be done. It would also weed out that few of the hosts who definitely don't belong in this arena.

4-Fire and Safety Criteria - This is a no brainer and isn't necessary for me to elaborate on.

5- Neighbourhood Livability Guidelines - Some guidelines on max occupancy, parking and trash etc. Simple everyday type of stuff.

Based on the data the city collected this past summer, (which we greatly appreciate by the way). It is obvious there is no appetite for harsh regulations in Winnipeg like these ones proposed in these preliminary draft by-law recommendations.

The main thing in the recommendations that needs to be resolved is the zoning requirement in residential R1 areas. This element was not implemented in Calgary or Regina. Oddly Regina was not added to any of the cross-jurisdictional studies, yet they are our closest neighbour. This one proposed zoning rule (by design, or inadvertently?) gets rid of most of the whole home options available to visitors to Winnipeg.

Looking at the financial projections of what this program will bring in for revenues vs what it will cost to operate seems off. You don't have to be an actuary to know this math is wildly incorrect. As if somebody missed a few zeros. Where does all of this projected math printed in the recommendations come from? Some of us would really like to see the equations that were used to arrive at that figure.

The proposed program which causes about 60% of the area STR's to shut down looks like it is only set up to pretty much break even. Meanwhile it is a huge cash cow if you add in all of the existing R1 listings. The R1 whole homes are not only the greater number of the listings, the licensing revenue from them is necessary to support the program (especially at the proposed hyper-inflated $500 bucks a pop! Owie!)

The whole homes in R1 areas are also the higher dollar $200, $300 and $500 a night rentals where the hefty portion of these tax payments would stem from. Using the $90 to $130 a night condos or the $50 to $95 a night spare bedrooms it would take a really long time to add up to much in the way of accommodation tax revenue. Especially capping this at ONE listing each. (That sounds more like a hobby than true employment for hosts and cleaners etc.)

Passing up all of this revenue does not seem like a decision most Winnipeggers would support in light the constant news reports of how broke our city is. This "show me the MONEY" sentiment from the public came through loud and clear in the public engagement data. Why is it not reflected in the proposed first draft by-laws? (Brandon, Manitoba put STR right up front in their tourism marketing plan).

Neighbourhood livability is always a main factor in any municipal regulation process on any topic. I really thought we were well on our way making strides together in the past two years

toward constructing new and progressive by-laws here like what they have in our close prairie neighbors to the west (Regina, Calgary, etc) until I read these draft by-law recommendations. They seem so hit and miss. Like a random patchwork of spare parts from other juridictions.

Something I found interesting from the report (in the section “Housing Supply and Affordabilty Report” Sheppard, S. & Udell, A. 2016.

"Do Airbnb Properties Affect

House Prices?", Department of Economics Working Papers, Department of Economics, Williams College) was this quote, “The authors caution that policies which aim to reduce house prices in pursuit of housing affordability by diminishing the efficiency with which an owner can make use of their property is unlikely to be welfare-improving.”

If council were to just to grandfather in the existing short-term rentals, which is (in my own opinion) the most humane thing to do at this point, there are so many positive things that could be accomplished locally with this substantial revenue source.

Winnipeg would better serve its needs by embracing the spirit of it’s housing affordability and livability agenda by opening up the housing market to more supply and flexibility that STR offers while steering the resulting growth toward equity and affordability. Meaning our city simply using the lucrative tax on short-term rentals could be dedicated to their affordable housing subsidies.

I also saw this quote in the report,

“The Public Service is recommending that short-term rentals be permitted in any zoning district that allows for residential uses, and not be permitted in any zoning district that does not allow for residential uses.” To me that means that the research and the planning department don’t agree with what came out in these draft by-law suggestions. Based on all of the public engagement data that there isn’t a requirement for the type of restrictive regulation, so who spend months collecting and deciphering data then ignore the findings?

Why was this discriminatory idea about short term rentals located in the R1 areas put on the table? This is by far the most damaging single item in the whole proposal.

It seems very strange to keep soliciting so much feedback from the hotel industry throughout this process when they are just one of our competitors. They should not be the ones influencing our fate (an obvious conflict of interest). Many of us feel the hotel industry's say shouldn't carry so much weight. This feels to me like a forced monopoly. Does McDonalds have to ask Burger King's permission to operate?

I was shocked that the Standing Policy Committee did not seem to want to attempt any type of regulation program before suggesting to shut down most of the STR listings. If you were a parent with a wayward toddler or teen, would you set some clear boundaries for your child to follow? Or would you just throw up your hands and give the child up for adoption? As the cliche goes, we are throwing the baby out with the bath water with where it sits now.

As a representative of the STR owners here who are negatively impacted by this in Winnipeg and especially as the owner of three R1 short-term rental listings myself, the opinion is that ignoring all of the city's own data and the recommendations of the planning department staff is a direct affront to everything we have tried to achieve together over the past two years.

I think the Standing Policy Committee on Property and Development needs to take this back and look hard at this data they spent so much time and money collecting. This set of recommendations needs to be edited into something more reasonable. This one is unfair for the majority of hosts in Winnipeg and benefits only a tiny percentage of our group. Seemingly the condos and downtown listings.

I am asking you to first and foremost take out the R1 zoning requirement and the cap on how many properties a host can have. If you truly don't want more STR's in Winnipeg give permits to all of the ones already operating so the cleaners, maintenance people, property managers and owners can all keep their jobs.

The biggest concern for this council appears to surround Residential districts so what if we put a moratorium on additional new short-term rentals within residential zones? That is still disappointing to the majority of our group but probably more palatable for them than what was just proposed.

The goal of council should be to create employment and revenue. The STR community is already doing that. The other role is to minimise neighborhood impact which a simple and straightforward licensing program with a merit and demerit program would achieve.

Whether a home is occupied by an owner or renter, and regardless of whether the occupancy is long-term or short-term, the use of a single family home for living purposes is a...“residential use” so should be allowed in a residential zone.

Winnipeg already has the comprehensive Neighbourhood Livability By-Law which governs all of the different types of housing so I am not sure why those specific by-laws aren’t already being enforced on any neighbourhood issues. We also have the Safer Communities and Neighborhoods Act. Why create these perfectly framed laws and then never actually put any of them into use? I have read both sets of laws mentioned and think they are much more far-reaching than anything proposed so far in this report.

I have previously explained the benefits of short term rentals the consumer spending stats which are big revenue opportunities currently flowing into our city that are not considered in the report or the over $2 million dollar uptick from the licensing fees and accommodation taxes.

Each guest spends on average $200 per day per person directly into our economy. For example with my three suites if they are rented on average 200 days per year this brings in approximately $960,000 per annum in spending to area restaurants, hair salons, movie theatres, concerts etc.

These figures can not be overlooked for the sustainability of some of the area small businesses. Multiply this number by the total number of guests using this service in Winnipeg and it becomes a figure with enough zeros that it could really make a substantial difference for us here.

I have heard the verbiage “decimating the fabric of a community”. I strongly disagree with that statement because the new definition of a “community” is not Charleswood or St Vital etc. A community is now the whole world!

Although I intended today's speech to be all about the hard data in the report, which we all know did not point to this harsher Toronto-esque (I made that word up) set of recommendations suggested in these draft by-laws.

However when discussing this sharing economy you can not ignore the human side of it. One of our group members has a duplex. She lives in one side and rents out the other side. (I hope you will be allowing secondary and tertiary suites for the people who live in a duplex or triplex as their primary residences).

Anyway, last year when all the refuges came flooding in from the Ukraine she wanted to help out but her short-term rental suite was fully booked. So what she did for a single Ukrainian Mother and her two children (who's husband had been killed in the war) was give up her own bedroom to them for 4 months while she slept on her sofa instead. It was a Mother, daughter and son. So the Mother and daughter slept in this host's bed and the host bought a single bed to place at the foot of her bed for the son to sleep in.

These are the type of scenarios you are saying no to by squashing 2/3 of the local listings in R1 areas. You heard from some cleaning staff who absolutely depend on this income some of those are refugees or new immigrants too. Those are the people you are placing into undue hardship.

You have heard some of the landlord's stories over the past two years. Some of that group is also single Mom's, indigenous hosts, new immigrant hosts, you have heard from disabled hosts who can not work a conventional job due to physical or mental ailments but they can do this hosting job. Then you have heard from people like myself who have clawed their way up out of generational poverty piece by painstaking piece over the last three decades to finally achieve something worthwhile and huge source of pride for me and for my family.

The vast majority of our hosts and the people who work in this field are not trust fund babies leasing out the mansion they inherited nnTuxedo while chilling down in Palm Springs for a few months out of the year.

Or leasing out their home in Winnipeg while they spend the summer at their luxe cottage in Lake of The Woods for 150 days a year. I think the true picture of the hosts, the guests and the working class people who would be dramatically affected by the proposed recommendations has been astoundingly misconstrued.

The guests at the condos are primarily here for work or sporting events. The ones in the full homes in R1 neighbourhoods are primarily here from Toronto or Calgary to visit their extended family that still lives in Winnipeg, or families here from rural areas of Manitoba or sometimes Northern Manitoba to get medical treatment for themselves or for their children.

This “oh my gosh it’s gotta be a party house or common body house” is nowhere near the norm. What is it .002% of all the STR business in Winnipeg? To my knowledge, there are about 3 hosts out of the some 350 hosts in Winnipeg that need to go? Licensing and registration would solve that element pretty quick.

We acknowledge that there is crime in short-term rentals, long-term rentals, hotels, primary residences, on the street, on the bus, at the grocery store, in the park, in parking lots, etc. The rampant crime in Winnipeg is not specific to short-term rentals and everyone knows here knows that too.

Regulating short-term rentals will not make Winnipeg any safer. I was in a Winnipeg grocery store at 8 am on a Tuesday this past August that was robbed at gun point. Until this city comes up with a plan to address the homeless issue, the drug issue, mental health issues there will be no changes here. Social programs take revenue to implement, luckily the local short-term rental community is offering you a few million dollars in licensing and accommodation taxes to get them started.

We are not the cause of all that ailes Winnipeg ... we are a significant part of the solution!

Melanie Mitchell

Manitoba Association of Short-Term Rental Owners Inc. - President/Founder