Dear members of the Executive Policy Committee – February 14th, 2023

Agenda Item No. 1 Regulating Short-Term Rental Accommodations

I have reviewed the highlights of the Winnipeg Public Service Recommendations and have the following comments/questions:

2.E: I don't understand the limit, and why an individual would be allowed to rent only one non-primary residence that be limited to areas zoned multi-family.

2.F: My wife and I are considered partners in a business. Does that mean we fall under this recommendation? Again, I do not understand the rationale or the limits.

2.H Who cares how many adults are staying as long as the STRA operator and renter agree?

2.K How does a corporation or partnership comply with a criminal record review?

2.M Why would I to be forced to use a licensed STRA platform, as long as the other safety requirements are met?

I have reviewed the Appendix C: proposed licensing and Enforcement Framework and have the following comments/questions.

Part 2 – General qualifications

I have no issue in obtaining a license, but why would I need a license for every STRA. The license could include all the STRA's that are included.

I do not understand why there are limits for how many STRA's an operator can manage. It does not make sense. Would the City apply the same conditions to any other private business in the hospitality industry?

Requirements prior to obtaining a license.

#4, #5, #6, #7 These all seem to be make work conditions, and already apply to any residence.

General Conditions for operation of STRA:

2. This Condition is probably in contravention of Privacy Act. This information is also not collected by most Short-Term rental Platforms to address confidentiality concerns.

5. Why would I to be forced to use a licensed STRA platform, as long as the other safety requirements are met?

6. The Winnipeg Police Service already has enough on their plate, why add this other layer of red tape on them and your taxpayers?

9. If the onus is on the STRA operator to provide changes to the City within 10 days, the City should also have the same performance requirement to approve the changes within 10 days.

15. Who cares how many adults are staying as long as the STRA operator and renter agree?

Part 3 – Primary residence

1. This seems to be more red tape in the making.
2. The primary residence is the property of the owners, the City should not be able to dictate who can or cannot stay in the residence, and how the owners choose to manage what happens in their primary residence.

Part 4 – Non-primary residence

I have an issue with the limit of "one" non-primary residence. I do not understand why there are limits for how many STRA's an operator can manage. It does not make sense. Would the City apply the same conditions to any other private business in the hospitality industry?

I foresee negative impacts with this draconian overreaching regulation,

1. It could negatively impact anyone that is in the City for medical treatment reasons. They often cannot afford or want to rent hotels, STRA work very well and fulfill a definite need.
2. This discourages small business to establish. STRA are the perfect option for someone wishing to invest in the community and provide short-term housing.
3. This also reduces the flexibility in switching from STRA and longer term rentals. Everytime a change is made, the City has to be notified….
4. This increases the burden on the City to manage more paperwork and restrictions.
5. If this regulation is simply to collect 5% Accommodation Tax so STRA are treated more like hotels, then the STRA should not be regulated any more than the hotel industry. As far as a know, corporations are not limited to 1 SRTA, I also do not think they need a license for every STRA they manage, they are not limited in how many people can stay in the rooms, and how does a corporation comply to the criminal record review?

These conditions seem to be in direct contradiction to any promises to remove red tape from anyone trying to do business or provide a service in the City of Winnipeg.

This seems to be a draconian approach to address a non-problem.

My recommendations….Keep it simple.

1. Allow STRA to be registered with the City. In return they can be posted on the City of Wpg website as registered STRA and would allow the police to check the address if there any complaints. This would also allow the 5% tax to be collected.
2. Once registered the STRA owner can make changes and updates as needed. Multiple locations can be listed with one registration and there should be no need to re-register every year.
3. Get rid of all the inspections, they are currently carried out by the STRA Platforms. Before you can list they review your listing and the listing operator. Remove the requirement for criminal

record checks as they are not feasible for ownership models that are partnerships. Why burden staff and police with paperwork that is already being done by someone else.

4. Remove the limits. If a person in a primary residence wants to rent out more than one room why should the city care? If a partnership or corporation wants to rent our more than one non-residence, as long as it complies with existing City of Winnipeg bylaws, why is it an issue?

Sincerely,



Marcel Hacault