Natasha (Nataliia) Samsonova M.S.W
Marker Research Analyst

To: Council City of Winnipeg
Date: February 12, 2023

Dear Council members,

I am writing to voice my professional concern as a research professional and Winnipeg citizen regarding the background for the recommendations on Regulating Short-Term Rental Accommodations.

1) The public engagement summary suggests that "*A jurisdictional scan identified the best practices… that could be applied in Winnipeg*" [Public Engagement Summary, p. 1][1], at the same time, in most cases, recommendations refer to Toronto as a reference market. Based on the population and other demographic indicators, Winnipeg's more relevant "counterparts" are Regina, Edmonton, and Calgary[2].

   That being said, the proposed regulations are among the most strict in the Canadian market, with the proposed fee being the second highest[3]. Also, there is little to no evidence on restricting the number of non-primary residences as long as they are permitted for STRA.

[1] City Clerk's Decision Making Information System. (n.d.). https://clkapps.winnipeg.ca/DMIS/ViewDoc.asp?DocId=23224
[2] Population and demography statistics. (n.d.). https://www.statcan.gc.ca/en/subjects-start/population_and_demography
[3] Cameron, A., Mukesh, K., & Tedds, L. M. (January 2022). Managing Airbnb: A Cross-Jurisdictional Review of Approaches for Regulating the Short-Term Rental Market. In School of Public Policy, University of Calgary. https://mpra.ub.uni-muenchen.de/111535/1/MPRA_paper_111535.pdf

Table 1: Short-Term Rental Classes and General Approaches across Canadian Regulations

jurisdiction	STR classes	principal residence requirement	dwelling type	night limit
Calgary	Short-Term Rental tier 1: 1-4 rooms tier 2: 5+ rooms	no	no limitations	no
Edmonton	Short-Term Rental Accommodation	no	no limitations	no
Kelowna	STR Accommodation -primary use (major) -secondary use (minor)	no—though primary use STRs are permissible in set tourist commercial and health districts	not permitted in a secondary suite, carriage house	no
Montréal	Québec legislation* Tourist accommodation establishment Principal residence	In Ville Marie, Plateau-Mont-Royal, Rosemont-La Petite-Patrie, non-principal residence STRs are only permitted in select commercial areas**	furnished apartment, house, cottage	no
Ottawa	Short-term rental includes cottage, bed & breakfast, dedicated STR (grandfathered)	yes (unless in cottage)—exception for dedicated STRs (grandfathered)	not permitted in accessory buildings, vehicles, trailers, community housing	no
Regina	Residential short term accommodation -principal residence unit -secondary property	no	no limitations	no
Saskatoon	Short-term accommodation -homestay -STR property	no	no limitations	no
Toronto	Short-term rental -entire-unit rental -partial-unit rental	yes	permitted in bed-sit, secondary/laneway suite; not permitted in vehicle	180 nights/year (entire-unit)
Vancouver	Short-term rental accommodation	yes	permitted in secondary/ laneway suite; not permitted in accessory bldg., vehicle	no
Victoria	Short-term rental -principal residence -legally non-conforming use	yes—units may qualify (legally non-conforming) if in areas previously zoned for transient accommodation	permitted in secondary suites and garden suites if the primary residence	no
Whistler	Tourist accommodation business	no	not permitted in employee housing	no

[Cameron, A., Mukesh, K., & Tedds, L. M., 2022]

2) Including Hotel Association in a consultation mix is a direct conflict of interest since STRAs provide affordable and convenient alternatives to hotel accommodation. If nothing else, STRAs should push hotel industry to unconstrained development and improvement instead then sabotage the competitors.
3) The proposed regulations are not well connected with the results of the statistical and online surveys:
   a) Treatment of survey results is selective. Generally, public opinion on STRAs is more favorable than negative (Statistical Survey), and at the same time, Regulating Short-Term Rental Accommodations report to the Council mostly emphasizes citizens' concerns[4]. For example, page 9 has, "*About 30 percent expresses worries about negative effects on the neighborhood*", should you refer to page 8, Public Engagement Summary Appendix A – Statistical Survey Results, it is clear that 30% are **among** those with negative or mixed views of short-term rentals.
   b) While most of the respondents are concerned with the impact on multi-dwelling development in the Downtown area, the final recommendations give the opposite solutions of the louse regulation in the mentioned area. I would like strongly argue that this data should be excluded from the decision-making process and be only presented as "for information."
   c) I previously have had comments about the quality of the online survey instrument (questionnaire) – please see attached – and stand my ground to that day. Survey data results on the maximum license limits, zoning limits, and impact on the rental and housing markets are rater uninformed opinions that are evidence-based concerns.
   d) The online survey sample description suggested that 143 of 843 respondents were short-term rental hosts or operators. At the same time, this subsample was not analyzed separately from other respondents. Then running the proposed regulation among only nine

[4] City Clerk's Decision Making Information System. (n.d.). https://clkapps.winnipeg.ca/DMIS/ViewDoc.asp?DocId=23224

industry representatives giving approximately 700 short-term rental hosts in Winnipeg (based on 2019 data)[5].

4) While some non-Canadian data [Appendix D] suggested that there "*is a small negative impact on housing supply and affordability*" [Public Engagement Summary, p. 12] Forbes article grounded at the same plus more data arguing that this effect is only the indication of a more significant process that are going on in the housing market.

"Whilst it's easy to slay Airbnb as the cause of rising prices and lack of rental stock in popular cities, one can't help but wonder if they aren't merely the backdoor escape for landlords that have been cornered into an impossible scenario... Perhaps Airbnb is just the tip of the iceberg, where an unforgiving approach to landlords and a lack of government capacity to deliver on their house-building promises are the bulk of the problem that's propping up Airbnb as the visible, easily targeted problem".[6]

Considering the background documents and some ethical concerns that I have raised earlier – selective approach to data usage and bias leading questions in the questionnaire (online survey), I strongly recommend another round of stakeholder engagement with short-term rental owners and operators and a more thoughtful comparison of the proposed regulations against relevant Canadian examples.

The attached letter from June 30, 2022 STR survey feedback.

2/12/2023



Natasha (Nataliia) Samsonova M.S.W
Marker Research Analyst

[5] Regulating Short-Term Rentals. (February 2023). Engage Winnipeg. https://engage.winnipeg.ca/short-term-rentals?tool=story_telling_tool

[6] Barker, G. (2020, February 21). The Airbnb Effect On Housing And Rent. Forbes. https://www.forbes.com/sites/garybarker/2020/02/21/the-airbnb-effect-on-housing-and-rent/?sh=7e86a68c2226

Natasha (Nataliia) Samsonova

To: Public Engagement City of Winnipeg

Date: June 30, 2022

Dear Ms. Brenda Jasper and Ms. Denae Penner,

I am a research professional with 20 years of experience in consumer, social studies, and market analyses. I am writing to voice my professional concern regarding the structure and wording of the “Regulating Short-Term Rentals (STR) Survey” that the City of Winnipeg has launched.

1. Question #2

   Given the criteria and chosen scale, it is highly probable that respondents won’t have the same understanding of the question. For example, “How does STR impact Illegal activity?”. I am struggling to find an appropriate answer between proposed choices - saying “very positive” does it mean it decreased or increased?

   For most of the criteria in question 2, the better choice would be:

   1. significantly increased
   2. slightly increased
   3. no changes
   4. slightly decreased
   5. significantly decreased

2. Question #3

   Based on my experience, more generic questions are better to locate at the beginning of the questionnaire to set the tone for more specific sections; therefore, I would recommend switching Q2 and Q3 places

3. Question 5

   Has criteria with pre-defined answers. Typically questions regarding the importance of safety and commonly agreed socially important issues should be formulated indirectly to eliminate the bias. In other words, we can hardly find someone that directly will respond “not important” on the safety of the community criterion. In this situation, ranking or sorting methods could help measure the importance better.

I am not affiliated with any STR, but simply would like to offer some possible improvements towards survey design. Taking into account my observations, I hope you may take a close look at survey results to make sure that they are not a result of question-wording but reflect the objective opinion of Winnipeg residents.

6/30/2022

X 

Natasha Samsonova, MSW
Market Analyst, PDA, Extended Education
Signed by: Natasha Samsonova