TO: Executive Policy Committee (EPC) Committee Meeting
RE: Item 1, Short term rentals, February 14, 2023
From: Fairbnb Canada Network

Thank you for allowing us to comment on the public service's proposed short-term rental regulations framework. Fairbnb Canada Network is a broad national coalition advocating for fair rules for short-term rentals that protect housing security and community safety.

We commend staff for their hard work in bringing forward a framework to regulate this growing industry. We are encouraged to see a framework built on the notion of the principal residence requirement, which ensures residents can participate in the economic benefits of short-term rental hosting, while avoiding major impacts on housing supply, housing affordability and community safety.

We are also pleased to see the framework contemplates platform registration. Licensing and regulating short-term rental platforms is critical to successful enforcement, and will save the City greatly needed staff time and resources.

We have two significant concerns to highlight:

1. Permitting commercial (non-principal residence) STRs in mixed use, commercial zones and downtown areas. Mixed use and downtown areas are not only areas where multi-residential dwellings are concentrated, they are also areas where housing growth and housing intensification are planned.

   Allowing commercial STRs to proliferate in these areas will siphon off housing supply where it is most needed, will impact housing costs where affordable units are most needed and will introduce "ghost hotels" in areas of dense housing where issues of nuisance and safety are most acute. We are seeing already a loss of affordable housing options in downtown Winnipeg, such as Lions Place and 185 Smith Street. Simply put, without properly regulating the the STR market, this will only accelerate the decline.

2. Permitting companies to offer commercial (non-principal residence) STRs. The "limit" of 1 commercial STR per company is illusory, as an unlimited number of separate companies could be created to host individual STRs.

Communities have taken different approaches to phasing out commercial STRs when adopting new regulations, to mitigate impacts on individual operators and to allow the accommodations industry to develop appropriate supply, if needed. Notably the town of Gibsons, BC has adopted a "temporary use permit" for non-principal residence STRs, allowing only a limited number of renewals. A strategy like this keeps the City in the drivers' seat, and prevents the permanent loss of residential housing stock to commercial uses.

Housing units permanently lost to dedicated tourist accommodations have been increasing steadily as Winnipeg exits the pandemic. We urge staff and council to act quickly. We are happy to provide further information, resources and research as the City moves forward with this important work.