21 February 2023

Jude Sanson
River Heights

Dear Winnipeg City Councillors and Mayor Scott Gillingham,

My wife and I have been operating a single short-term rental house in River Heights Winnipeg since 2017. It is not in our primary residence and is zoned R1. The recent proposal by Mayor Gillingham and the Executive Committee would destroy my rental and all of the time and money that we have invested in it during the last 6 years. We made this investment in good faith and with a belief that we were contributing to Winnipeg's economy and its community.
Our short-term rental has provided a safe, affordable and comfortable place for refugees who are moving to Winnipeg, grieving relatives and friends attending funerals, people receiving medical care, tourists and friends and family returning to Winnipeg.

Making standalone short-term rentals in R1 neighborhoods illegal is a terrible thing for Winnipeg and does not represent the promises made by Mayor Gillingham or the will of Winnipeg residents who overwhelmingly feel that short-term rentals are positive for Winnipeg.

Mayor Gillingham and the Executive Committee seem intent on making the lives of many Winnipeger's more difficult by enacting bylaws that are unnecessary and punitive in nature.
All of this in the wake of multiple years of pandemic and lockdown, inflationary pressure and rising interest rates. Small business owners in Winnipeg now have to face a City Council intent on destroying their investments and wiping out all of their hard work.

I would like to take this opportunity to comment on the Public Service recommendations and the Executive Policy Committee Resolutions regarding Item number 1 - Regulating Short-term rental accommodations - February 14th 2023.

Public Service Recommendations based upon feedback received and jurisdictional research. (Public engagement Summary - page 8)
It's extremely important to highlight that the Public Service Recommendations ignored the clear results from the two surveys and the stakeholder feedback.

The Statistical Survey which is believed to be statistically representative of Winnipeg's population had the following results. (Results are within plus or minus 4 percentage points)

38% feel that short-term rentals have a **positive/very positive** effect in Winnipeg versus

16% who felt that they have a negative/very negative effect.
(49% of those who thought that short-term rentals had a negative effect were unsure why they thought that.)
31% didn't have an opinion or were **unsure**

Key FInding; "those who have some experience with short-term rentals – either as a renter, host or neighbor – are more likely to hold positive opinions about this type of arrangement."

This statistically significant result shows that Winnipegers are in favor of short-term rentals. I urge the Council to listen to the results from the survey that they commissioned. Winnipeg people have responded that they want short-term rentals (in R1 neighborhoods) and that they **don't** want them in the downtown or in multi family zoned buildings.

The results of the **Online Survey** which gave the city a chance to gather further understanding of the impacts of short term rentals are overwhelmingly in favor of short-term rentals in R1 zoned residential areas.

Online survey respondents who live in multi-unit dwellings, such as apartments and condos, reported more negative impacts from short-term rental accommodations compared to those who live in single-detached dwellings.

Reported Negative Impacts in multi-unit dwellings

Noise	2.21 times greater reported negative impact
Property damage and maintenance	2.55 times greater reported negative impact
Sense of Community	2.16 times greater reported negative impact

Similarly Online survey respondents who live in Downtown Winnipeg reported far more negative impacts than those who live in other Winnipeg residential neighborhoods.

Reported Negative Impacts in Downtown Winnipeg vs other neighborhoods

Noise	2.06 times greater reported negative impact
Property damage and maintenance	2.03 times greater reported negative impact
Sense of Community	1.90 times greater reported negative impact

Based upon the results of the Statistical Survey and the Online Survey it is clear that Winnipegers have a positive view of short-term rentals and at the same time they believe that short term rentals in Winnipeg's Downtown and in multi-family units have a two times or greater negative impact.

The Glass House Building is a prime example of the negative effects that short-term rentals can have in the downtown and to the permanent residents in that building. Residents of the Glass House building have expressed concerns about policing other absentee owners who try their best to hide that they are using their units as short-term rental suites.
In buildings where a significant number of the units are owned by corporations that run "Ghost Hotels" it is not possible for the other permanent residents of the building to ban short term rentals as they do not have enough votes to alter the by-laws or regulate individual owners.

The Winnipeg Public Service has recommended that the proposed regulations are more permissive of short-term rentals in zoning districts that allow multi-family buildings - Winnipeg's Downtown and more restrictive in zoning districts that are primarily characterized by single family dwellings - R1 residential.
Somehow the Public service has got this completely backwards. This is not at all what was expressed in the results of the Statistical or Online Survey.

The Public Service is ignoring the results of the Statistical/Online survey of Winnipeg people and has recommended regulations that oppose the will of the people.

This will destroy much of the residential short-term rental market in Winnipeg and take away livelihoods from small family operators who have invested heavily in their properties and rely on the incomes to support them now and in their retirement.

Winnipeg people want short-term rentals in residential neighborhoods and the people who live in Downtown buildings are being negatively impacted by the "Ghost Hotels".

The Public Service also has no evidence that short-term rental properties are having a negative effect from a housing supply or affordability perspective.

Executive Policy Committee Resolutions regarding Item number 1 - Regulating Short-term rental accommodations - February 14th 2023
Decision Making History
Moved by Mayor Gillingham

To paraphrase; Mayor Gillingham was elected with a commitment that he would support new short-term rental by-laws if the transition to new rules is fairer to small local operators.
The most urgent target of the by-law was said to be so called "Ghost Hotel" operators, who operate banks of apartments or condominium units in multi-family zoned buildings, rather than smaller owners operating modest operations to employ themselves and their families.
Owners in downtown (Multi-family zoned) areas reported more negative impacts from short-term rentals compared to other respondents who live in other (R1) neighborhoods in the city.

The amendments moved by Mayor Gillingham and then approved by the Executive Policy Committee to be forwarded to council will be devastating to me and to the majority of short-term rental owners in Winnipeg's R1 zoned neighborhoods. Instead of helping small local operators of modest operations (as promised) the zoning restriction and limiting stays to 29 nights would destroy my investment, take away my livelihood and negatively affect my retirement income.

I believed Mayor Gillingham and the Council when they said that they would listen to the results of the Statistical and Online Surveys and come up with new fair rules that would provide for safe

regulated short-term rentals and not destroy the investments that have been made by families in their futures and Winnipeg's economy.

The amendments do nothing to secure my investment as a small operator of a single short term rental in an R1 neighborhood that is not my primary residence and unfairly ignore the will of the people. Mayor Gillingham and the Council have an opportunity here to listen to the people and also make good on their promises as outlined by what was moved in the Executive Policy Committee - Feb 14th 2023. I trust that the appropriate changes will be made to make all of this right.

29 Night Maximum

The 29 night maximum stay proposal would be very damaging to my short-term rental and it would also have a negative effect on Winnipeg business, tourism and people who need somewhere safe, flexible and affordable to stay.

Since September of 2019 and through the worst of the COVID pandemic lockdowns my short-term rental has had more than five stays that were longer than 29 nights.

Recent Examples

In January 2023 I hosted a Manitoba person who is recovering from Cardiac surgery for over 30 nights. They normally live in the US during the Winter and then come back to Manitoba to conduct their seasonal business. Complications from the surgery required that my guest stay in Canada - the medical rehabilitation care required would be too expensive in the US. Their partner had to return to the US, leaving my guest on their own and attending a local rehabilitation center in the neighborhood. I was happy that we could provide a comfortable and safe home for this guest during their recovery.
This guest discussed that staying in a Hotel would be too expensive and depressing for them and that they needed to have a kitchen to make their own meals. They also had limited options as they did not want to stay far away from the rehab center. There were short-term rentals downtown but they were too far away and not safe for them as they would have to walk in the downtown area to get to public transport.
If short-term rentals were limited to 29 nights those staying in Winnipeg for medical care would find it more expensive, uncomfortable and difficult.

April 11th 2021 until Feb 14th 2022; 309 days or 10 months and 3 days

During the COVID Pandemic the construction and engineering company responsible for the amazing translucent roofing structure at the Leaf at Assiniboine Park, Winnipeg stayed at our rental. A team of engineers and installation supervisors stayed at our Short-term Rental for

10 months and 3 days. Due to the previous construction delays and some degree of uncertainty surrounding timelines during COVID lockdowns they required somewhere to stay that was close to Assiniboine Park and with a high degree of flexibility so that they were not locked into a year long lease if the project was temporarily suspended for any reason.
I was happy to accommodate them and have what might be a long profitable booking during COVID lockdowns. It also felt good to be contributing in a way to an iconic project that would help put Winnipeg on the map for tourists around the world.
The proposal to limit short term rentals to no more than 29 nights would have meant me turning down a very important booking. I would have lost very important money for my family during the very hard COVID lock down period. I do not understand the reasoning for limiting a stay to 29 nights. I would have to explain to a guest that the booking can only be longer than 29 nights if I break it up with a night where they must pack up and move to a hotel for the night and then come back. They would never understand this and I would be at a loss to explain the reasoning behind it. Seems very draconian and unnecessary.

Additional 30+ night stays

September 6th 2020 through October 31st 2020.
55 days or 1 month and 25 days.
Guests were renovating their house.

November 3rd 2020 to April 3 2021
151 days or 5 months
Guests were renovating their house.

The Mayor and Executive Policy Committee needs to revisit their proposed rules and use their power to support standalone short-term rental properties in R1 zoned neighborhoods. The rules should not limit the number of nights to 29 and they should not be tied to a primary residence.

The Executive Policy Committee has seriously misjudged the economic and community benefits of short-term rentals in R1 neighborhoods and additionally ignored the will of the people as shown in the Statistical and Online Surveys. It's time for Mayor Gillingham and the Council to support small business and tourism in Winnipeg and accept that short-term rentals are a valuable resource that provide a unique service to a very broad group of people.

Thank you for your time and attention to this matter.

Sincerely,
Jude Sanson