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February 17, 2023

Dear Council Members,

RE: Proposed regulation for Short-term rental accommodations

My name is Chris Thorne and I am the owner/operator of Spruce Properties. We primarily own long term rental accommodations but have also own and operate some short term rental accommodations (STRA's) in Winnipeg as well.

I am writing to you today because I believe the City is greatly overstepping with its proposed regulations for STRA's, and I will explain why:

To begin with, Toronto's licensing & registration model was use as a framework for creating Winnipeg's policy.

Starting with a city 8x the size of Winnipeg with entirely different dynamics is a poor way to craft our policy. Instead, we should be looking to other similar sized cities as Winnipeg when drafting our policies.

As far as I'm aware, most of Toronto's issues with STRA's has to do with large condo towers where the majority of units are operated as STRA's. I can understand why owner occupants would be frustrated with that situation, and I agree regulation is probably needed to remedy that.

STRA owners are not against regulation such as annual licensing, safety requirements or collecting business tax on revenues.

However, restricting STRA's based on zoning and limiting the number of STRA's someone can operate are all mistakes.

1. Restricting STRA's from being in R1 and R2 zoning districts does not make sense - was this even identified as a major issue? Have there been complaints in the past? Why shouldn't visitors to our City get to enjoy it from the serenity of a residential neighborhood, instead of either downtown or a suburban hotel surrounded by a sea of parking?

I would propose that STRA's be permitted in R1 and R2 zoning districts, but that licensing can be suspended/revoked if bylaw infractions are occurring frequently.

2. Limiting the number of STRA's that can be operated by a single person or corporation would essentially kill the industry in Winnipeg. There are many responsible STRA operators in Winnipeg and this would unfairly decimate their business overnight.

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Many of the proposed rules will have unintended consequences, and I think what is being forgotten in all of this are the benefits of STRA's (many of which people would not be aware of):

- Provide extra capacity when Winnipeg hosts large events that otherwise couldn't be accommodated with hotel rooms. Imposing restrictions would have the unintended consequence of hurting Winnipeg's tourism industry.

- Provide an alternative to hotels which serve their purpose, but not for extended stays. STRA's provide more space and more of a "home" feeling. I personally use STRA's for my family while traveling, as we have 2 young children and it's hugely beneficial for everyone to have their own room.

- Making affordable travel possible for large groups - we have a property with 5 bedrooms and 2 kitchens. We have many bookings for the entire building, and families are able to stay together in a budget friendly way. For example, this building costs them $300/night with me vs. $800-$1,000/night when having to rent multiple hotel rooms.

- Many new immigrants to our country use STRA's when first arriving, some for only a few weeks at a time and some for months on end. The spaces are large enough to be comfortable, while still being affordable when compared to a hotel.

- STRA's better alternative to hotels for Winnipeg residents who have had fire/water damage to their primary homes and need to relocate for weeks or months on end. Again, larger spaces make it more comfortable than staying in a hotel.

I urge you to reconsider some of the proposed regulations that will have some negative unintended consequences for reasons I've outlined above.

Kind regards,



Chris Thorne
Spruce Properties