I am happy to be here speaking to you on behalf of the members of The Manitoba Association of Short-Term Rental Owners, which is a collective of everyday Manitobans actively engaged in the home-sharing economy.

I would like to thank honorable Mayor Gillingham, the council, the public service and everyone here who has given their insight and input on this project of regulating short-term rentals in Winnipeg. We sincerely appreciate the public engagement survey and these opportunities to collaborate.

Altering the original proposal to now include the R1 and R2 zoned listings was viewed by STR owners' community as a more humane route for this council to take. The majority of our membership interpreted it as a solid first attempt to avoid bankrupting several thousand Winnipeg residents working in this industry.

The uncertainty of this regulation issue has been an incredibly heavy weight for us. I never know whether I should buy just one replacement set of sheets for my guest house or a whole case. It's pretty hard to run a business this way, always hesitant to make any permanent decisions and wondering if you will still be operational a few months out.

Of course, no one likes to be told what they can and can't do within their own home or with their own investment property. That kind of structure and regiment makes us entrepreneurial types feel tight in the chest!

However, of course as in any industry, there should be a standardized set of guidelines to operate within. The licensing and registration program is not a surprise and we welcome it. The conscientious STR hosts, like my peers and I, want to see the right business practices and image being projected in all local listings. We want to finally be considered as an integral part of the Winnipeg brand. The licensing and registration plan should simply allow us to carry on with what the majority of us have always done well.

At the beginning of all of this journey of my friends and family members told me to "give up, forget about it, a regular citizen cannot influence change and these deals are done behind closed doors with individuals in a much higher tax bracket than yourself". Or I heard, "Sell your houses, move to Calgary"… I am so pleased to discover this is NOT how things work in Winnipeg!

Several of the wonderful local homespun short term rental offerings were saved by the R1 & R2 changes. Many of the local cleaning staff jobs were saved. Many of the landscapers and snow removal people's jobs were saved. Many of the coffee shops and bar owners will be as relieved as we are that one significant positive motion has come out of all of this dialogue so far.

The city's own survey data from last June clearly indicated that furnished rental hosting has a solid place in Winnipeg's cultural landscape. This is according to a healthy majority of the survey respondents. We hope those results are going to be considered

when forming the framework for new regulation. Otherwise, why would we spend all the time and money on this in-depth research?

Contrary to the naysayers claiming this industry “decimates the fabric of a community“ I would have to strongly disagree. A “community” is now the whole world. What builds a stronger community than multiculturalism? The neighbor’s to my STR’s have loved meeting the people I have hosted from Japan, Australia, South Africa, etc. They also felt compelled to write letters of support for my endeavor some of these you will find attached in the written delegations for this meeting.

The huge financial benefit of short-term rental revenue for Winnipeg cannot be ignored. The spin-off revenue it creates for other neighboring small businesses is substantial. Especially in areas of the city that are not typically considered as traditional “tourist” meccas.

In terms of the finite details of the last proposal, we are curious to see if a lot of other parts of that document have been amended yet. As there are several issues contained in it so far that make operating a short-term rental business unnecessarily difficult, cumbersome and impractical. Many of the pieces our organization has a concern with are not connected to neighborhood safety.

Wouldn’t it be more prudent for the city to just introduce the licensing and registration program for now? Through that structure it would then be easier to identify who we are and where our STR listings are. After a set amount of time monitoring the registered properties, it would be easier to know exactly what the specific concerns in managing short-term rentals are. The by-laws could then be drafted specifically and accordingly.

I see it as almost like starting a management position at a new company. Most new managers try to observe for a bit to find out the lay of the land at this new company first before making any sweeping administrative or operational changes.

There are still some tweaks many of the members in our association would want to see considered.

1-**Exterior Contact Info:** One of my own personal biggest hang ups with the rough draft of these by-laws is this posting my private contact info on the outside of the houses. There should be nothing out of the ordinary on the exterior of the house signifying it is not a regular residence. These houses need to blend in to the neighborhood for the safety of both guests and hosts.

I have on occasion hosted women with their children fleeing an abusive domestic situation. They wait secretly at my listings for safe transport out of Winnipeg or out of the province. It is also for this reason I am heavily opposed to this request that keeps coming up to mark the outside of these houses.

We all know how rampant property crime is in Winnipeg. Announcing that this house is sometimes empty is so dangerous. A thief just needs to check the online calendar to know when the ideal time would be to break into that house. The license holder's name and phone number on the outside of the house is completely unacceptable to me and the majority of our association members. It allows the home owner to be stalked easily. I also have a concern with identity theft if someone knows my name, my phone number and my address. Personal information cannot be accessible to the public in this manner.

At the car dealership where I work our business permit is located on a plaque sitting at reception inside the building. There has to be a way to put a license for STR inside the building too. All of the neighbor's living adjacent to my properties already have my contact info anyhow and soon the city will have easy access to it too.

I have already spent a bit of time pouring through the Privacy Act trying to find the right section to use as evidence to disallow this extremely dangerous request. I have not yet found the exact legal wording to support our position, but I am confident with a bit more time spent immersed in that document there will be a way to avoid having personal information on the outside of these houses.

I have exterior cameras on every entrance so I don't leave it up to the neighbours to inform me of what is going on at my houses. It makes no sense to lend out a half million-dollar asset to a stranger without this due diligence. Make exterior cameras on each entrance part of the by-law if you are really interested in improving neighbourhood livability. Another thing to improve safety would be to disallow one day stays on a weekend. For this document to prohibit the longer stays is counterintuitive.

2- **The 30-Day Cap**: None of us see the reason for this to be included in the requirements. If it surrounding concerns with guests turning into squatters or receiving tenancy rights to the property, why not have the property owner assume the risk on that, rather than cramping the typical workings of this enterprise making it completely impractical for guests. Especially those displaced from their homes on an extensive insurance claim or newcomers trying to get settled in Winnipeg.

The night cap makes no sense if neighborhood livability is the true motivator behind these by-laws. This absolutely has to be struck from this proposal. Hosts need to be able to flip back and forth between short, long and mid-term stays to run a successful and customer centric business. We don't kick people out of their suite after 30 days without reason. This unduly inconveniences them for no reason other than some made up government preference. This clause is absolutely unacceptable to me and to everyone else in this industry.

3- **Licensing Cost**: There was what we felt to be a very high cost suggested early on in the draft documents for both primary residence listings and the secondary residence ones. Those proposed numbers have since nearly tripled from the original quote. The most recently proposed fees in the latest report are right up there among the highest

fees in Canada. (Just because Vancouver recently raised their licensing fees by 800% does not mean Winnipeg should be doing this).

In Ste Catherine's, Ontario the fee is $500 and the license is good for two years. In Calgary the cost of a license ranged from $100 to $276 per year in a tiered system based on the number of rooms rented and acknowledging what style of listing it was. In Regina, Saskatchewan a primary residence STR is similarly $100 and a non-primary is $300.

**Quite a few cities have offered the first year of license and registration fees discounted or free to encourage uptake and compliance.

My own costs to license my three houses (two three-bedroom homes and a four bedroom) under the new regime would cost TWENTY-SIX HUNDRED DOLLARS per year! I was pretty shocked and taken aback to hear that! Why would it be nearly ten times what it would be if I lived just five hours further West in the prairie provinces? Interest rates on the properties I am using for STR have skyrocketed from 2.1% to nearly 6% recently. In three years, I will actually owe more on these houses than I do today. The mortgages I am holding have gone up (if you add them all together) by $1200 per month more this year. I am definitely not the only one on my team that is being hammered by the Bank of Canada's monetary policies right now. I am already wondering where that substantial difference is going to come from, I did not count on another $216.66 a month just for licensing.

A license for a home-based hair salon is $750 per year. Wouldn't that business be substantially more foot traffic and vehicle traffic than a short-term rental?

It is my own opinion that this exorbitant change licensing cost is a punitive measure, a cash grab and a backhanded way of essentially shutting many of the current short-term rentals down while still appearing on the surface to allow them. "You can do as you you wish but it is REALLY going to cost you!"

Most of the math in the report looks way off to me (as it has been in pretty much all of the reports to date), but I will leave it up to some of the accountants and actuaries on our team to dispel that part of issue. After all of the cutting of the current industry and the gouging on license fees, will there even be 500 STR's left in Winnipeg?

It bothers me to read as a tax payor that three vehicles were purchased specifically for this program … that is likely an easy $100,000 spend right there! However, that is not something I have any day over.

4- **Snowbirds**: Most Canadian and American cities allow a 180-day rental for primary residence dwellings when the owner is away on a holiday. I am curious why Winnipeg's document pitched out 150 days instead. This section does not affect very many of the hosts in our group, but the snowbirds would appreciate a bit more time to be away without leaving their house vacant.

5- **The Grandfathering Plan**: builds in obsolescence. Eventually there will not be any more short-term rentals in Winnipeg. That is so unfortunate. I still wonder why there is no succession plan. Does this indicate that council has still not grown to fully appreciate the true value of these types of accommodation offerings for newcomers and visitors to Winnipeg?

People from all over the world prefer this type of travel arrangement. I strongly believe that having STR as a competition helps keep hotels affordable and pushes that industry to up their level of service, cleanliness and their marketing approach. This is a good thing!

Competition in business always produces a better end result for the consumer. As always, it's the actually consumer (not the municipal government) who is our boss in this and we should all be answering to them. Their preference varies according to the individual guest and their circumstances, we should never get in the way of that. That's if our city council wants to Winnipeg to become a recognized leader in the hospitality industry.

6-**Private bookings** - why can a host not do a private booking? So long as a log of the visit is kept and accommodation taxes are paid. These properties belong to us locals not to the big American platforms. Many of us have built our businesses on repeat and referral guests. Airbnb and VRBO did not forge these relationships, they are purely an introduction service. I don't see why the city council in Winnipeg is pushing us hosts to give up more of our profits to an outside entity. The means by which we receive our bookings should be not be a factor. It's not fair to be curbing the way we find bookings and raising licensing fees to unacceptable levels. Why not just be satisfied with licensing and sit back and enjoy our huge accommodation tax contributions.

Neighbourhood livability is improved on a 45 day stay versus a one day stay. We need to able to put family and friends up in our properties for as long as they wish as well as guests who come from on or off the platforms. We also need to be able to stay in our listings temporarily ourselves for a few months at a time if necessary to complete renovations on our own primary residences or like I did last year while in between selling a home and buying another one. The way you have this set up it seems that none of these options are available any longer as uses for these properties. Then in the news there is always a problem with under-used properties, this current wording creates under-used properties instead of more density (which I thought was desired).

6-**Criminal Background Check**- Most of the membership is not worried about passing this requirement but they are worried about how long this will take to complete. Is our police services set up to background check 500 people at once? Will there also be a cost for this and can we stay operational while waiting on the results it be done? Can this be done only once at the initial application for a license?

Personally, I endorse this practice of a background check if it improves safety for hosts and guests. What bothers me is that the short-term rental industry has been singled out on this. To my knowledge hotel staff and long-term rental landlords are not subject to this same scrutiny. It is my own firm belief that anyone with access to a guest's suite or rental house needs a background check. That should be across the board in all forms of property management and hospitality (this of course includes hotels) as long as we are looking to achieve a "level playing field" I kept hearing about in media interviews with anyone from the hotel industry. The hotel industry should not be able to pick and choose which things they want us to join up on and which aspect they wish to be exempt from. I am still surprised and confused as to why the hotel industry (and their lobby group Fairbnb) has been given so much influence in the decisions that affect our industry.

We look forward to more discussion on this with you. Please let any of the board members of our Manitoba Association of Short-Term Rental Owners know if there is any additional information you need from us to help hash out the final details on this mutually beneficial project of STR regulation in Winnipeg.

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