

Back when this regulation issue got started, this is what the first report said our city council wanted to accomplish with the drafting of these new regulations:

“The recommended approach to regulating STRAs is seeking to set minimum standards for community safety, consumer safety, neighborhood accountability, and to foster equity in the accommodations industry.”

Based on the recipe for regulation quoted above, I have some questions:

1-Community safety - How does capping the number of nights allowed to rent to an individual or group on a single booking enhance neighbourhood safety? Why was it set at only 30 days maximum? Why not at least 90 or 120 days? The reason I say 120 days is because this is an average length of time for an insurance claim, some of them are longer of course depending on the extent of the damage.

I had one family from Windsor Park stay for eight months on a pretty elaborate claim. The roof on their house collapsed due to snow load. I had a Northern Manitoba couple stay for 45 days while their premature baby was clinging to life at our Health Sciences Centre.

There isn't anyone in our association who understands the reasoning behind this seemingly arbitrary 30-day rule. I have not seen this clause listed before in any of the neighboring cities I have looked into for a comparison either.

What has Winnipeg city council got against a guest staying to work here for a few months, or staying here for a few months as a new grandparent to help out with a newborn grandchild, or to help a friend or family member heal from surgery, or deal with closing out of an estate? These are all common reasons people have stayed in our properties for longer than 30 days. Many of us feel this part of the report does not match up with the typical operation of an STR business.

Our organization members firmly believe that there isn't any practical basis for this rule and it absolutely needs to come out of the draft by-law as a requirement. Hotels are not subject to any caps on maximum number of consecutive nights. The flood victims and fire evacuees from many other areas of the province and the country have stayed in hotels and short-term rentals for several months almost every year. Why would we not want STR's to help house them the next time a natural disaster hits our province?

Further on the “community safety” topic is our concern for safety of the operator and support staff. Local STR owners are also part of the community and feel strongly that our privacy and all identifying contact information should be held securely, **solely** by the immediate neighbors to the STR listing and the by-law officers as needed.

There can be no sign, or symbol, on the exterior of the house identifying it as a short-term rental. It does not matter how “small”, or “inconspicuous”, the public service has

described it to be. Thieves are highly sophisticated now and you already know the crime rate in Winnipeg is off the charts. It would not take very long for the theft rings to figure out this new system, leaving STR houses vulnerable to break and enter problems.

Eg: A month ago I saw on my surveillance camera there was a thief in the process of breaking into the garden shed at my STR. In my anxious state with the 911 operator, I accidentally said "Someone is breaking in!" (Without finishing the sentence with ... "to my shed".) So, the call was dispatched as a "home invasion". No police ever showed up to stop this thief from unloading the entire contents of my shed! The next day in the afternoon (at least 18 hours later) I got a call from WPS asking if I was ok after the "home invasion" issue I had reported the night before! Stemming from this experience and many other similar ones over the past two years, I have come to the frightening conclusion that in reality there is no actual police service in Winnipeg, even for something as serious as a home invasion!

It is now my understanding that this dangerous and unnecessary ask is entirely legal, which was shocking to find out. However, that still doesn't mean it's a wise thing to do. Whomever thought this part should be added into the report is for sure not a single woman living alone, or anyone who has ever been an identity theft victim, or a stalking victim.

2-Consumer Safety - Yes, our group can endorse all of the common fire and health safety standards, so long as they match up to what would be required for a regular primary residence or long-term rental under the already hefty "neighbourhood Livability Act."

We are in favor of a criminal background check so long as hotels have to background check all staff as well ... remember the "**fostering equity in the accommodations industry**" part? The STR industry should not be burdened with anything not currently required of the hotel industry. Our only concern with this requirement is; how long will it take and how much will it cost? The tough part is the bad operators who need to be subjected to this particular requirement the most, will likely still slip through. It still does not seem foolproof. What would stop them from putting the listing in their spouse or sibling's name who has a clear criminal history? We also do not want to see a huge bottleneck where the department doing the checking gets so bogged down that it delays our ability to operate.

We are in favor of any course offered or information to be shared about spotting the signs of human trafficking etc. that was mentioned in the report.

3-Neighbourhood Accountability: This should be a given and already is for the majority of us. The only way to be truly accountable to the neighborhood is to go meet with the neighbors in person and give them the contact info. Mine have my cell number, work number, email address. They also have all of these same contacts for my partner. I have theirs in case I ever spot something amiss with their house too. We are both each other's unpaid security system. This direct contact method should be the **only** way our

contact info gets shared, (except what is submitted to the city on the license application and held in strict confidence on our file).

4-Fostering Equity in the Accommodations industry: We are so pleased that the main goal of these regulations center around creating “**equity**”, that was a great when this stated out. However, where did it go off course with the proposal of the massive crippling licensing fees, the cap on number of nights to rent it, and that names on the houses issue?

If council's focus was truly on creating “**equity in the industry**” these three contentious issues should not remain in the draft by-law. This trajectory of putting the STR industry through rigours the hotel industry had not been subjected to is swinging the pendulum too far the other way. The hotel industry does not pay hundreds or thousands per rental unit in licensing within their buildings (according to a local hotel owner I spoke with on this topic recently.)

Opinions: (some are my own, some belong to our larger group).

I'm not a fan of these entirely “**big stick**” based solutions to force market participants like myself and my peers to conform to what is widely viewed as unreasonable requests. From my business management background, I have learned that using punitive measures does not typically encourage compliance. There is always a ton of backlash with that method. (Think about how you effectively raise your teenagers at home.) Conversely, using incentives to reward the right behaviour works amazingly well to shape positive outcomes. This brings me back to the merit and de-merit system others on our team have brought up as an option. Think of our driver's licensing program and try to emulate that highly effective regime.

Myths & Truths About the Housing Shortage:

I don't agree with the narrative being actively pushed, (by the hotel industry, their paid lobby group Fairbnb, or the McGill University research group commissioned by the hotel industry to do a “study” \$\$\$ on STR's effect on housing), that short-term rentals are even remotely the cause of any local rental shortage. As it has already been said at the last meeting, there are over 1200 places for rent in Winnipeg listed on Kijiji right now and many more than that listed for purchase.

The proof that “**STR is taking up all available housing**” is not based on any hard data, at least in Winnipeg, according to some of the most accurate sources you can consult on the topic of real estate, such as the most recent Census report, CMHC, Kijiji's “For Sale” or “For Rent” ads and of course the MLS real estate listings and stats. Any claims that short-term rentals are “**absorbing all available housing for families**” are based solely on emotion, anecdotal stories and media hype designed specifically to encourage fear in the uninformed like a feeding-frenzy!

Lately STR has become a catchall cause for anything and everything housing-related. Quite surprisingly, a few weeks ago at a Standing Policy Committee on Property and Development meeting, the STR industry was accused of being the root cause of people living in bus shelters and riverbanks! Our industry has been blamed for increasing property values, as well sometimes it is often blamed for diminished property values too...etc, etc, etc.

I am no expert on the motivation behind someone choosing to "live unsheltered." So far as I have read on this topic, the cause of living this lifestyle stems more commonly from things like generational trauma, alcohol and/or drug addictions, or mental illness. STR is obviously **not** the cause of people living in bus shelters and on riverbanks in our city, either directly or indirectly! To insinuate even a remote connection would be to deliberately ignore or downplay the serious legitimate well-documented societal causes to fit a narrative. One thing that we do know is it isn't caused by the just 0.37% of all Winnipeg housing currently being used for STR (even before all of the proposed cutting)!

Why can people not buy a house? More accurately it stems from the tight job market, the surging uncertainty of today's prime lending interest rates, the cost of basic commodities like food and fuel... STR hasn't got anything at all to do with those issues.

What I would like to point out to council is that these STR owners are among some of the precious few Winnipeggers who have been able to carve out some form employment for themselves, in the toughest economic times of most of our lifetimes! Why are there so many attempts (by only a few of our councillors) to curb that ambition? I/we are confused by this attitude that the STR industry is somehow viewed in this forum as oddly "**less than**" the hotel industry. Please be conscious of pushing what could be considered as a "**forced monopoly**" by the Competition Bureau of Canada.

To downsize the local STR industry, as tightly as what has been discussed in these reports, is not the answer. Even if council were getting rid of STR in its entirety, all the few available houses (0.37% to be exact) might satisfy is a couple month's worth of rental demand, that's it! Then what? What would then become of the thousands of Winnipeggers who stand to lose their employment by becoming collateral damage in this decision?

So what if there were to come a few empty suites in Winnipeg, due to the decimation of a once vibrant industry? What if these impossibly high licensing fees, restrictions on the number of units you can own, restrictions on being a Winnipeg resident to own one (pretty unfortunate for those in East St Paul and Headingley hey!)... got rid of every last one of our STR's through this impossibly tight proposed legislation? Then I have to ask, "Would the people living unsheltered on the riverbank right now automatically qualify for all of these newly vacant high-end suites?" Or, "What would the people who had been living in a bus shelter provide as a reference when asked for the contact info for their former landlord?" Or, "Would any private landlord in Winnipeg accept this tenant for

their suite.” I don’t know of any who would. Maybe there a few who might, but realistically it’s not very likely.

“Affordable housing“(based on current minimum wage in Manitoba) is considered closer to a \$750 per month apartment. Of which there are close to none, with or without any whole home short-term rentals listed in Winnipeg.

How Can This be Fixed?

We need some creative interim solutions. Perhaps look at some tiny home neighborhoods, or incentives for empty nesters to downsize, or converting unused office space into apartments? Maybe work in more tax benefits for long term rentals than short term? Property owners can often be incentivized to follow the money!

I respectfully disagree with the narrative being pushed that Airbnb is even remotely the cause of the rental shortage. This is like saying that to fix the new car shortage we should ban the taxis because there are some taxi vehicles on the road and we need more cars available for purchase at the dealership. Just say no to other forms of transportation too! Does that sound like a silly scenario when you switch “STR” to “car”?

As we have been saying, short-term rentals are not the cause of the housing crisis. Chronic shortage of housing stock is. If you look at the rate of dwellings being built and all the red tape surrounding building anything, plus builders going bankrupt lately, it just makes the pressure higher.

Just when small businesses like cafes/bars/restaurants are starting to find their feet again after the pandemic, they need the support of our nearby STR businesses to funnel customers to them more than ever. Right now, while the whole community, STR owners included, is being squashed by rising inflation and interest rates it is not the time to vote on an issue geared to put over 2000 more local residents out of work!

The Sunny Side of the Street:

My STR listings have been all been endorsed to council by the immediate neighbors to these guest houses. Based on their rental price point they are not taking anything away from the supply of student housing or affordable housing.

What about the guests to Winnipeg who absolutely rely on this offering, like our First Nations friends and medical staff coming in to Manitoba to relieve some of our already over-burdened health care workers. Think about this, if travelling medical staff on 2-3 month assignments can’t find any furnished rentals, nurses, mental health workers, and other specialists will have a much more difficult time supporting Winnipeg in particular. They may choose to go to other provinces, stretching out already stretched medical system even farther.

Please don't let these decisions become a battle of wills or egos just for sport. Things have become very heated here with so much at stake, I get it. Please do not make any decisions with blinders of personal bias on stemming from a negative past experience with an entirely different entity (like illegal rooming houses as one example). There are zero similarities between a guest house designed for short stays and a rooming house. Each time it comes up as a comparison it only serves to highlight an extreme lack of understanding of the inner workings of a typical STR operation. This is such a shame because the information has been consistently offered to everyone on council over the past three years in so many different formats. Information and insight as a resource has always been readily available to all council members at every juncture of this process. Unfortunately, to my knowledge, it hasn't really been tapped into.

What I hope that you as city councillors will keep in mind during this process is that these are real people up at the podium with serious real-life concerns. Nobody shows up to city hall just for fun. You already know that the decisions you make here will have far-reaching effects and would be life-altering for the presenters.

We are all struggling to defend our livelihood. For some of the families involved in this issue their very basic human right to **"security of the person"** in reference to their financial survival absolutely hinges on it. Please try to be cognizant of the incredible amount of power you have over the lives of others right now and make your decisions coming from a place of caution, compassion and carefully thought-out consideration.

Melanie Mitchell - President
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