



December 4, 2017

12th floor, West Tower, City Hall
 100 Queen Street West
 Toronto, ON M5H 2N2
 Attention: Marilyn Toft

RE: PG24.8 Zoning By-law and Zoning By-law Amendments to Permit Short-term Rentals and LS23.1 Licensing and Registration Regulations for Short-Term Rentals

Dear Mayor Tory and Members of City Council

This is to express our strong support for the regulation of short-term rental accommodation in order to protect the rental housing market and our residential neighbourhoods from the kind of instability that would result from an influx of transient visitors. We also believe that the regulations need to be very carefully written to ensure that they can be effectively enforced, and without causing a workload burden on the City, and ultimately on taxpayers.

As such, we believe that the short-term rental regulations being developed by the City of Toronto should include:

- a principal residence requirement for hosts,
- a city-run licensing and registration program, and
- strong easily enforceable language to ensure compliance by both hosts and the rental companies themselves.

We support the staff report and the following additional recommendation made by PGMC:

- **the prohibition of secondary suites** (like basement apartments and laneway housing) from the short-term rental market, **except if the secondary suite is listed by its actual principal resident.**

However, In addition we recommend that:

- the City require **up-front, mandatory proof of principal residence** (including government ID) from hosts (currently, this is a requirement for on-street parking permits)
- the City require short-term platforms (like Airbnb) to **only list valid city-permitted properties on their sites** (it should be illegal for the platforms to display properties without a valid short-term rental permit);

- Condominium boards which have already **prohibited short-term rentals in their buildings** be included in a City-administered, “prohibited building list,” allowing for easier enforcement of the regulations

These provisions are needed in order to: protect the City’s rental housing market, to keep our residential neighbourhoods safe, and to ensure that the regulatory framework has integrity, is efficient and enforceable.

Respectfully submitted,

Yours truly,

Geoff Kettel
Co-Chair, FoNTRA

[REDACTED]
Toronto, Ontario

[REDACTED]
[REDACTED]

Cathie Macdonald
Co-Chair, FoNTRA

[REDACTED]
Toronto, ON

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[REDACTED]

Cc: Gregg Lintern, Acting Chief Planner and Executive Director, City Planning Division
Tracey Cook, Executive Director, Municipal Licensing and Standards

The Federation of North Toronto Residents' Associations (FoNTRA) is a non-profit, volunteer organization comprised of over 30 member organizations. **Its members, all residents' associations, include** at least 170,000 Toronto residents within their boundaries. **The residents' associations that make up** FoNTRA believe that Ontario and Toronto can and should achieve better development. Its central issue is not *whether* Toronto will grow, but *how*. FoNTRA believes that sustainable urban regions are characterized by environmental balance, fiscal viability, infrastructure investment and social renewal.