

## **Attachment 4: Feedback from public survey, public meetings, and stakeholder meetings**

### **Results and analysis of public survey**

#### **Background**

From March 28 to April 18, 2017, the City conducted an online survey to collect public input on regulations for short-term rentals in Toronto. The survey consisted of eight questions, including one open-ended question asking for respondents' general thoughts on short-term rentals in Toronto and seven closed-ended questions on respondents' backgrounds and history with short-term rentals. There were 3,875 completed surveys. Most respondents lived in or near areas with relatively high concentration of short-term rental activity. Nearly two thirds of respondents identified as homeowners and one third as renters. Respondents spanned all adult age groups and communicated a wide range of perspectives and experiences with short-term rentals.

#### **Summary**

Respondents had both positive and negative perspectives on short-term rentals. They were evenly divided on whether short-term rentals have improved or undermined long-term housing affordability in Toronto. Most respondents agreed that short-term rentals promote tourism and economic development, but that the City could do more to regulate short-term rentals in the interests of affordability, community, and safety. The majority of respondents believed that short-term rentals are appropriate in owner-occupied housing (particularly single-detached, semi-detached, and rowhouse housing) to provide short-term accommodation to one occupant group (e.g. individual, family, group of friends) at a time.

#### **Question 1: Tell us what you think about short-term rentals in Toronto.**

Given the high response volume (3,311), staff conducted a detailed review of a 20% sample of responses (672) and coded them using different categories to broadly reflect the comments from respondents. Each response was then further coded as positive, negative, or neutral depending on the attitude expressed toward the area of concern in their response.

The results from question 1 in the online survey were generally consistent with staff findings from two public meetings that were held in April 2017. Survey responses that addressed housing affordability and supply in Toronto were the most polarized, where 43% of such responses reflected a positive attitude (e.g. made housing costs more affordable) and 47.5% reflected a negative attitude (e.g. made housing less affordable). Many renters expressed concern that short-term rentals decrease the already limited supply of long-term rental housing for residents and increase rental prices in the long-term rental market. On the other hand, many homeowners underscored how they rely on short-term rental income to make mortgage and property tax payments, and to pay for the high cost of living in Toronto more broadly.

Survey responses that addressed the remaining categories were less divided. Most (97%) responses that mentioned tourism reflected an opinion that short-term rentals positively contribute to the tourism industry and/or visitors' experiences in Toronto. For example, a number of responses highlighted how short-term rentals are a relatively affordable and more personalized form of accommodation for tourists, attracting a broader spectrum of people who might not otherwise be inclined or able to afford to visit the city. Similarly, many responses reflected the view that short-term rentals comprise a positive alternative (e.g. cheaper, feel more at home) to hotels and other forms of short-term accommodation (e.g. hostels, bed & breakfasts). In addition, responses that mentioned the impact of short-term rentals on local economic development and employment were overwhelmingly positive (88%). In fact, many respondents who identified as short-term rental operators highlighted how much they enjoy taking visitors to their favourite local businesses in the city.

Although more than half of the sampled survey respondents held a positive attitude toward short-term rentals in Toronto, most responses also reflected a desire for increased regulation and/or oversight. For example, nearly two thirds (63%) of responses that mentioned the impact of short-term rentals on the respondents' communities or safety were negative. Residents living in detached dwellings and condominium units cited various ways (e.g. increased noise, disrespect or damage to property) in which short-term rental users had a negative impact on their neighbourhoods, buildings, and/or senses of security. The large majority of respondents who addressed the related issues of regulation (i.e. licensing, restricting short-term rentals to owners' principal residence) or taxation believed that more could be done to regulate (78%) and/or tax (75.5%) short-term rentals. Slightly less than 20% of respondents who addressed these issues exhibited opposition to any restrictions or regulation on short-term rentals.

The analysis of question 1 is presented in Tables 4-1 and 4-2.

Table 4-1: Sample responses counts by theme and attitude (total counts as percentage of total responses)

	Positive	Negative	Neutral	Total	% of total responses
Long-term housing affordability	76	84	17	177	26.3%
Tourism industry	214	2	4	220	32.7%
Community and safety	27	50	2	79	11.8%
Hotels/short-term accommodation	95	11	11	117	17.4%
Regulation/restrictions	28	110	3	141	21.0%
Taxation	10	40	3	53	7.9%
Local business and employment	78	8	3	89	13.2%
Other	199	38	37	274	40.8%
<b>Total Responses*</b>					<b>672</b>

\*Note: Counts by theme and attitude do not amount to the total sampled responses, as many respondents commented on various themes and expressed both positive and negative attitudes in their responses.

Table 4-2: Sample responses as percentage of total responses by theme and attitude

	Positive	Negative	Neutral
Long-term housing affordability	42.9%	47.5%	9.6%
Tourism industry	97.3%	0.9%	1.8%
Community and safety	34.2%	63.3%	2.5%
Hotels short-term accommodation	81.2%	9.4%	9.4%
Regulation/restrictions	19.9%	78.0%	2.1%
Taxation	18.9%	75.5%	5.7%
Local economy and employment	87.6%	9.0%	3.4%
Other	72.6%	13.9%	13.5%

### Question 2: Who should be allowed to offer units on the short-term rental market?

There was a strong consensus that property owners should be permitted to offer units on the short-term rental market, including both house owners (82%) and owners of condominium units (70%). However, only about half of respondents (52%) believed that owners of several properties should be allowed to rent out units on a short-term basis. This is consistent with the large number of responses in question 1 that stated short-term rentals should be limited to homeowners' principal residence.

Just over one third of respondents indicated that short-term rental units should be offered by renters (36%) or by landlords of rental buildings (38%), which suggests a preference for limiting short-term rentals to owners. Slightly more than 10% of respondents chose the open-ended 'Other' category and provided a wide range of responses, including property owners who pay a short-term rental tax, owners who rent out designated and/or registered short-term units, and owners who live at the residence being rented. 10% of respondents stated that short-term rentals should be prohibited altogether, and only 33 respondents indicated they were unable to provide an informed opinion. The responses to question 2 are presented in Figure 4-1.

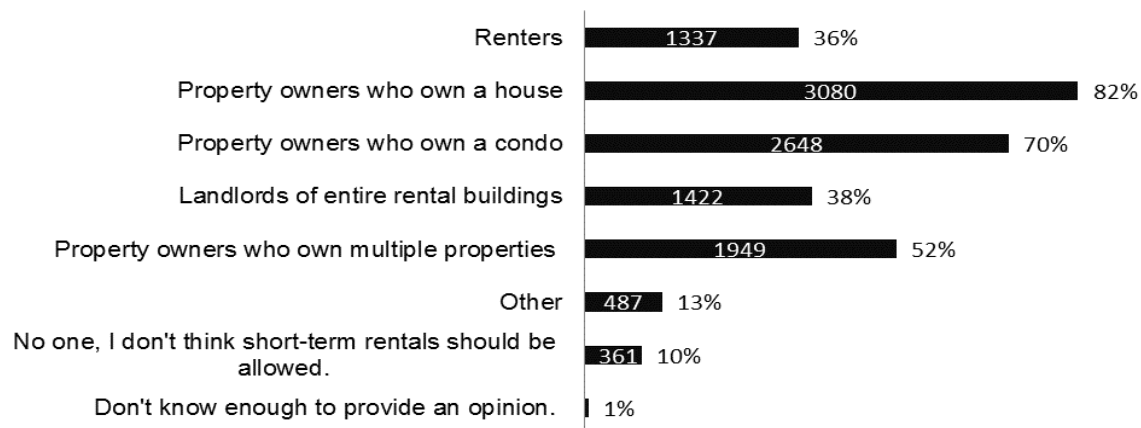


Figure 4-1: Number of responses to question asking who should be allowed to offer short-term rental units

### Question 3: What type of property should be allowed for short-term rental in the city of Toronto?

Consistent with question 2, only 9% of respondents indicated that no kind of property should be allowed for short-term rental. The large majority of respondents agreed that most owner-occupied properties should be permitted for short-term rental, including detached houses (82%), semi-detached houses (77%), and townhouses or row houses (77%). Slightly fewer percent of respondents believed that multi-unit, owner-occupied residences should be allowed for short-term rental, such as duplexes, triplexes or fourplexes (72%) and condominiums (71%). Similarly, there was significant but less support for allowing apartments (63%) to be rented out on a short-term basis. Less than half of respondents believed mobile homes (48%) should be used for the purposes of short-term rental.

15% of respondents chose the open-ended 'Other' category, indicating that cottages and vacation homes, treehouses, houseboats, tiny homes/guesthouses, and registered and/or licensed properties should be allowed for short-term rental. The responses to question 3 are presented in Figure 4-2.

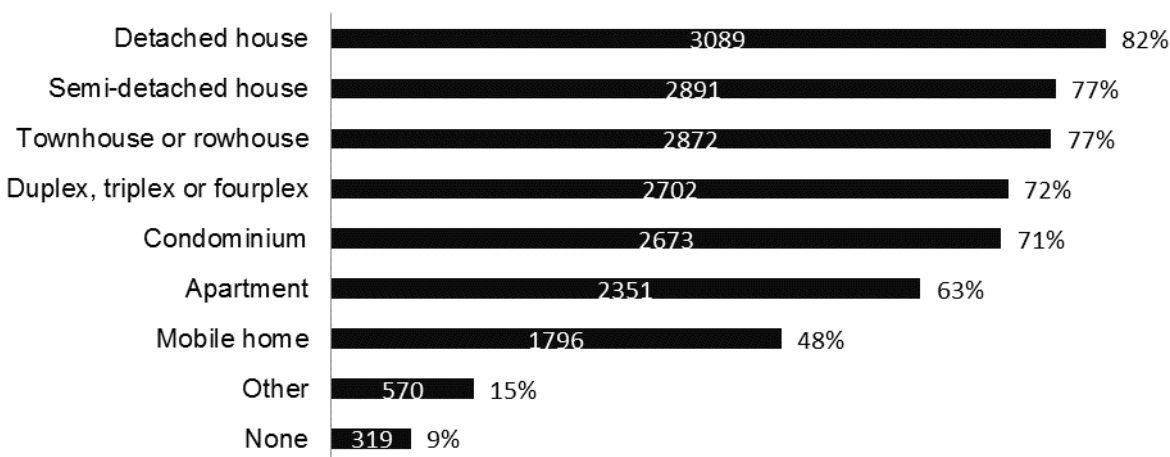


Figure 4-2: Number of responses to question on what kind of properties should be allowed for short-term rental

### Question 4: What type of space should be allowed for short-term rental in the city of Toronto?

The large majority of respondents indicated that entire residential units (76%) and a single spare room (78%) should be permitted for short-term rental. In addition, there was strong support for allowing short-term rental of basements and/or secondary suites (77%). Respondents provided less support for renting two spare rooms (71%) and three or more spare rooms (63%) on a short-term basis, which suggests respondents were less keen on allowing short-term rental with more than one group occupying the same residence.

8% of respondents chose the open-ended 'Other' category and suggested that short-term rentals should be allowed in any space where the property is licensed and/or regulated, converted spaces within homes, lofts, houseboats, and all spaces. Similar to the responses to question 2, 10% of responses to question 4 stated that short-term rentals should be prohibited altogether, and 39 respondents indicated they were unable to provide an informed opinion. The responses to question 4 are presented in Figure 4-3.

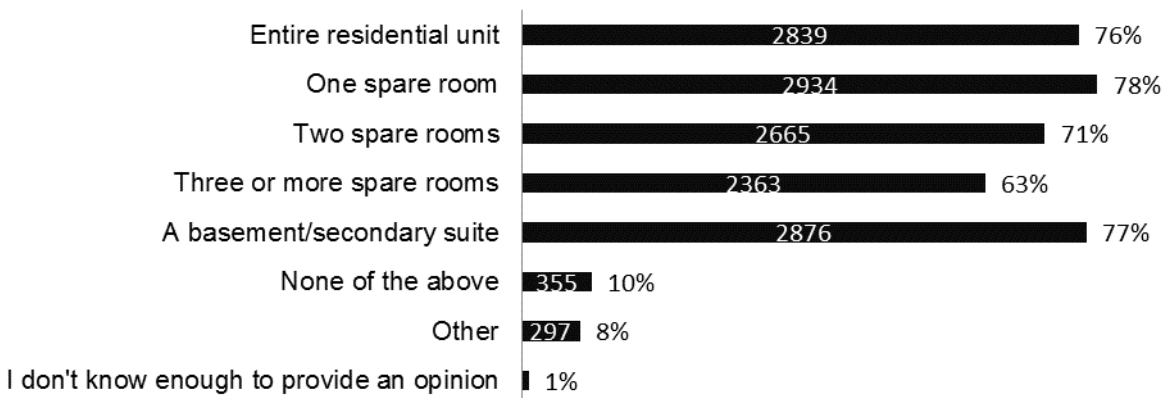


Figure 4-3: Number of responses to question on what kind of properties should be allowed for short-term rental

## Questions 5 to 8: Demographics

### Housing status

31% of respondents said they were renters, while 64% said they owned. Because about half of all households in the city of Toronto are renters, these numbers illustrate that renter households were underrepresented in the survey population. 5% of responses were 'Other' and included residents living with family (often due to the lack of affordable rental spaces in the city), people renting on an interim basis after purchasing a pre-construction property, residents who own one or several properties but rent others, condominium managers, residents of co-operatives, and respondents who are currently homeless. These responses demonstrate the complexity and wide range of housing situations, as well as the broad spectrum of people who feel affected by the operation of short-term rentals in Toronto. Figure 4-4 illustrates the breakdown of respondents describing their housing situations.

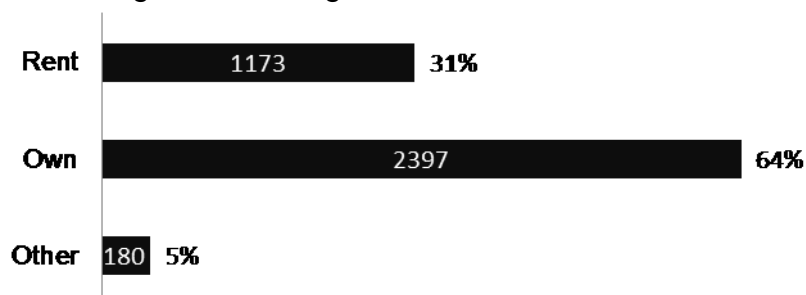


Figure 4-4: Number of responses describing housing situations

### Respondent location

Respondents provided the first three digits of their postal codes (Forward Sortation Area or FSA). Figure 4-5 illustrates that most respondents were concentrated in Toronto's inner city, particularly in and around the Downtown and Central Waterfront area. There were sizeable concentrations of respondents living in areas spanning different parts of the Davenport (17 and 18), Trinity-Spadina (19 and 20), St. Paul's (21), and Toronto-Rosedale (27 and 28) Wards. Although there was a slight concentration of respondents living in Willowdale (Ward 23), overall few respondents were living in Etobicoke or Scarborough.

The residential location patterns of survey respondents roughly correspond with the geography of short-term rentals in Toronto, as short-term rentals are disproportionately concentrated in Toronto's inner city and, to a lesser extent, along Yonge Street in North York. This suggests that the survey attracted respondents who largely reside in areas with high numbers of short-term rentals, including homeowners who rent out properties (or parts of properties) on a short-term basis and residents who are affected by the operation of short-term rentals in their communities.

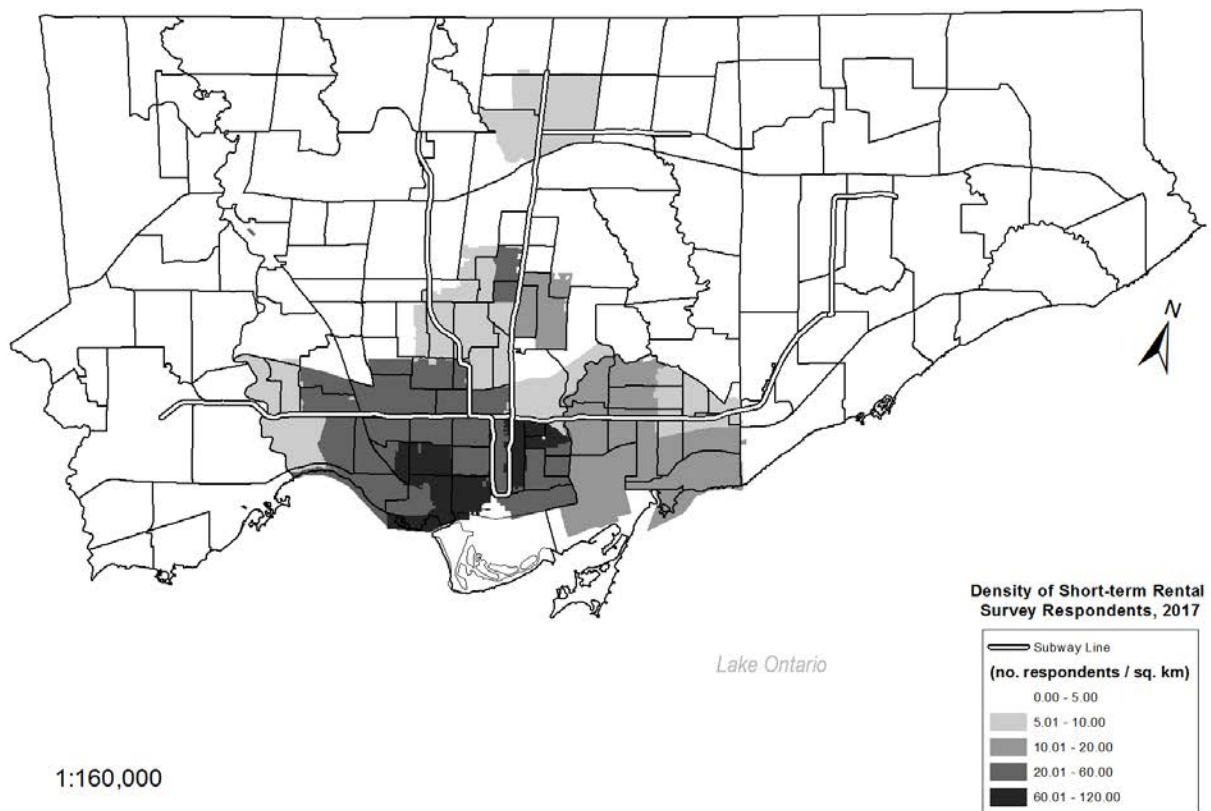


Figure 4-5: Density of survey respondents by FSA and Ward in the City of Toronto\*

## Age

More than half of survey respondents were between 30 and 59 years of age, where 32% of respondents were between 30 and 49 and 21% were between 40 and 49. 18% of respondents were under 30 years of age (mostly adults who were aged 19 years or older). 29% of respondents were 50 years of age or older – 17% were between 50 and 59 and 12% were 60 or older. This breakdown is shown in Figure 4-7.

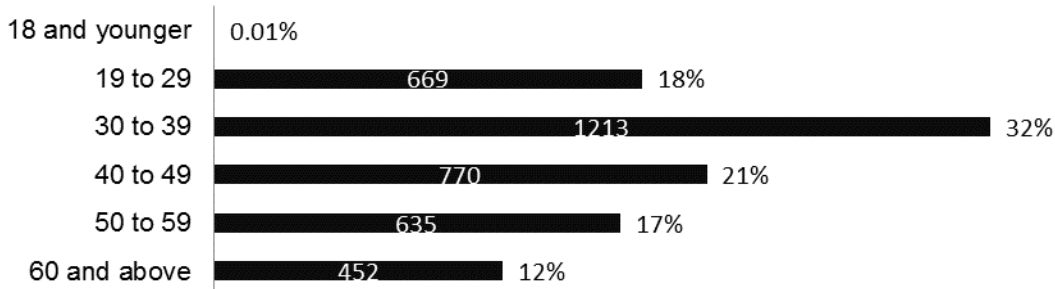


Figure 4-7: Number of responses to question asking for respondents' age

## Experience with short-term rentals

Survey respondents had experience with short-term rentals, both as renters and operators. 26% said they had operated a short-term rental in Toronto and 9% said they had operated outside of Toronto. 55% said they had stayed in a short-term rental outside Toronto, and 25% said they had stayed in a short-term rental within the city. In addition, 25% of respondents stated that they lived near a short-term rental.

16% of respondents indicated they had never operated or stayed in a short-term rental of any kind, and 3% of respondents preferred not to respond. 9% of respondents chose the open-ended 'Other' category and provided a wide range of responses. These included lawyers of condo corporations (experiencing issues with short-term rentals), condo managers, members of condo boards, friends of condo owners and/or people who have used short-term rentals, bed and breakfast operators, hotel managers, persons employed in the real estate industry, and persons considering using short-term rentals or renting units on a short-term basis in the future.

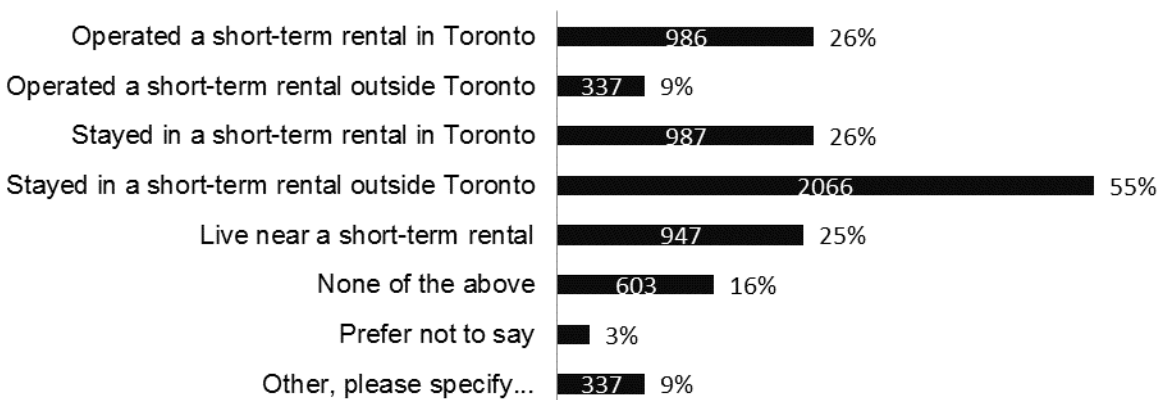


Figure 4-8: Responses to question about relationship with short-term rental market

## Results and analysis from public meetings

### Summary of public meetings

City staff led two public meetings to gather input on from residents and stakeholders. The meetings were held in North York Civic Centre and Toronto City Hall, respectively, based on the higher concentration of short-term rentals operating in those areas. The meeting held at City Hall was streamed on YouTube and Periscope corresponding with a Twitter townhall to allow online viewers to participate in the feedback process.

There were a total of approximately 320 in-person participants in attendance at the public meetings and over 700 views of online periscope streams. In-person participants ranged from residents, short-term rental operators and platforms, neighbourhood and community groups, housing advocates, condominium representatives, amongst others. After a short presentation, participants were divided into small facilitated group discussions to answer the following questions:

- What are your experiences with short-term rentals?
- The City is considering developing new rules for short term rentals in Toronto. What issues should the City Consider?

Given the variety of stakeholder groups represented, there were many experiences and concerns that were shared. Operators typically had good experiences. Many took pride in their short-term rental activity and explained that the income derived from renting their properties short-term made it easier for them to afford paying for their property, making renovations, and living in the city. Operators were concerned about the possibility of high regulatory burden and high fees and taxes. Some operators suggested that the City should focus on enforcing against problem short-term rental operators and take a more lenient approach to "good operators" who they believe are encouraging tourism and enhancing local economy.

Residents and neighbourhood advocates shared negative experiences with short-term rentals. Those living near the activity said that there was excessive noise from parties and continuous activity, garbage and general lack of upkeep of surroundings, damage to buildings, parking issues, and safety concerns around a continuous flow of unknown guests. A few residents explained that the disruption and nuisances drove them to sell their homes and leave their neighbourhoods. Condo dwellers were particularly concerned about the activity as many explained that their condo rules did not permit, yet operators/guests find ways to avoid the rules and building security. Many were supportive of regulating short-term rental operators, limiting their activity, and holding them accountable. Some urged that both the platform and the operators should be held accountable.

There were some hotel workers who were concerned about potential job losses in their industry and a shift toward precarious work. Operators and platforms countered that short-term rental activity actually creates work (e.g. property managers; cleaners).



Housing advocates expressed concerns about short-term rental activity worsening housing affordability and availability in the City. Operators countered that there are other causes for the housing crisis in the city than short-term rental activity.

Overall, many participants across different stakeholder groups agreed that some form of regulation would be necessary; the extent of this is where participants varied in their opinions.

## Summary of input from public meetings

City's areas of interest	Experiences with short-term rentals	Key issues
<b>Neighbourhood/Community</b>	<ul style="list-style-type: none"> <li>• Guests and operators rate each other after stay allowing self regulation and vetting by operators:               <ul style="list-style-type: none"> <li>○ Incentive for operators to maintain their properties</li> <li>○ Incentive for guests to behave well and not be disruptive</li> </ul> </li> <li>• Proper vetting by operators may help mitigate/control nuisance, noise, wear and tear, and other issues</li> <li>• Short-term rentals help build community</li> <li>• Guests do not spend a lot of time in neighbourhoods/ have little impact on neighbourhoods</li> <li>• Short-term rentals provide income for home improvements, thereby improving neighbourhoods</li> <li>• Parties held at short-term rentals disturb neighbours</li> <li>• Operators have problems with people staying 1 night – typically party guests</li> <li>• Short-term renters are more likely to present problems as they are transient</li> <li>• Unhosted stays are more likely to present problems as there is no one overseeing activity in the unit</li> <li>• Short-term rentals in apartments and condos result in accelerated wear and tear</li> <li>• Homeowners forced to leave neighbourhoods where short-term rentals are happening in multiple houses and with little oversight</li> <li>• Rising condo fees and wear and tear related to short-term rentals</li> <li>• No immediate person to contact when there are problems with short-term rentals</li> <li>• Shared driveway with short-term rentals leads to nuisances and late night activity</li> <li>• Long-term residents feel like they are living next to businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Short-term rentals generate nuisance and unwanted noise negatively impacting neighbourhoods</li> <li>• Turnover of guests negatively impacts sense of community in neighbourhoods and condos</li> <li>• Need to license or register operators to oversee activity and enforce rules</li> <li>• Additional requirements around condo short-term rentals could prevent nuisance and wear and tear (e.g. prohibiting use of shared amenities, parking; informing property manager)</li> <li>• Neighbours are not notified of short-term rental activity and cannot "leave a bad review"</li> <li>• Operators are skirting condo rules/ hiding short-term rental activity from management and neighbours</li> <li>• Condos should have power to decide what happens in their buildings</li> <li>• Only permitting owner-occupied/principal residence short-term rentals could help to contain nuisances and other issues</li> <li>• Need clear rules for condos and requirement to inform condo management of short-term rental activity</li> <li>• Multi unit operators and companies have little oversight over short-term rental units and guests using units</li> <li>• Penalties against bad operators; encourage good operators</li> <li>• Need oversight for operators (licence, registry, or permit)</li> <li>• Hold platforms accountable for nuisance issues</li> </ul>

City's areas of interest	Experiences with short-term rentals	Key issues
<b>Tax</b>	<ul style="list-style-type: none"> <li>• Some operators pay HST, when applicable</li> </ul>	<ul style="list-style-type: none"> <li>• Tax on short-term rentals should be fairly applied</li> <li>• Tax on short-term rentals should not be as high as hotel</li> <li>• Taxes and fees would make short-term rentals less affordable for tourists</li> <li>• Clear benefits/rationale for tax would need to be defined</li> <li>• Clarity on type and extent of activity to gauge who should pay commercial versus residential property tax</li> <li>• Taxes should be earmarked for affordable housing</li> <li>• Tax should go to impacted neighbourhoods</li> <li>• Short-term rental tax should be based on number of units used (more units = higher tax)</li> </ul>
<b>Tourism/ Economy</b>	<ul style="list-style-type: none"> <li>• Short-term rental helps local economies by increasing tourist traffic</li> <li>• Short-term rental fills gap where there is a lack of hotels outside of the core to meet demand (e.g. North York, beaches, universities); promotes tourism to these areas</li> <li>• Short-term rentals makes travelling more affordable and brings in more tourists</li> <li>• Savings allow guests to spend more</li> <li>• Short-term rentals allow families to travel affordably</li> <li>• Short-term rentals are more affordable compared to traditional industry</li> <li>• Operators promote local businesses and tourist attractions through short-term rental activity</li> <li>• Hosted stays are unique - positive experiences as guides; operators see themselves as "ambassadors to city"</li> <li>• Operators earn more money by renting on a short-term basis</li> <li>• Short-term rentals attract guests who may not otherwise choose hotels</li> <li>• Making use of properties that would otherwise be vacant when operators are travelling</li> <li>• Fear that there will be traditional industry job losses resulting from impact on traditional industry</li> </ul>	<ul style="list-style-type: none"> <li>• Public should be educated on the benefits of short-term rentals on the economy</li> <li>• Short-term rentals creates jobs – short-term rental property managers; hospitality jobs; maintenance jobs; spin-off jobs/economy</li> <li>• Regulations should treat operators fairly, e.g. geographical limitations would unfairly prevent some from making income from short-term rental activity</li> <li>• Home owners and renters should be treated equally in regulations to allow everyone access to earning income from short-term rental activity</li> <li>• Short-term rentals promotes precarious and unstable work (e.g. contract cleaners versus full-time hotel staff)</li> <li>• Negative impact on traditional industry; hotels are converting to condos resulting in job losses <ul style="list-style-type: none"> <li>○ Fewer hotels/ guests means fewer shifts/jobs</li> </ul> </li> <li>• Short-term rentals are more profitable for operators potentially displacing long-term renters</li> </ul>

City's areas of interest	Experiences with short-term rentals	Key issues
<b>Housing Availability/Affordability</b>	<ul style="list-style-type: none"> <li>• Income generated through short-term rentals makes housing and life in city more affordable for operators</li> <li>• Short-term rentals give operators flexibility with tenure of guests / does not lock landlord into lease with tenant</li> <li>• Provides transitional housing and medium term rentals, as well as short-term</li> <li>• Some operators may not revert to long-term rental market if short-term rentals are not available</li> <li>• Short-term rentals taking away rental housing options</li> <li>• Difficult to find long-term housing because of short-term rentals</li> <li>• Landlords evicting tenants to use units as short-term rentals</li> <li>• Cost of long-term rent is increasing as a result of short-term rentals</li> <li>• Subsidized housing being used as short-term rentals</li> <li>• Short-term rentals cannibalizing affordable student housing</li> </ul>	<ul style="list-style-type: none"> <li>• Short-term rental fills a need that hotels cannot meet (tourists, newcomers with no rental history or credit, divorces, interns, hospital stays)</li> <li>• City should not blame short-term rentals for housing problems; City should deal with housing issues differently</li> <li>• Need to collect data and analyze on ongoing basis to understand issues and impact (whether negative impact or no impact) on housing/rental prices and availability</li> <li>• Inequity in allowing short-term rentals: some can invest in property and use in this way and some cannot</li> <li>• Excluding condos or renters from short-term rental activity would not be fair</li> <li>• Property owner rights need to be considered</li> <li>• Residential Tenancies Act is too restrictive</li> <li>• Home-sharing and commercial activity should be defined and regulated differently</li> <li>• Short-term rentals are exasperating housing affordability issue</li> <li>• Short-term rentals are making housing less available</li> </ul>
<b>Safety</b>	<ul style="list-style-type: none"> <li>• Guests can misrepresent themselves and some operators are absent / do not personally meet guests (use lockboxes to exchange keys, share condo key fobs, etc.)</li> <li>• Safety concerns when there is no operator on site</li> <li>• Safety concerns relating to turnover of unknown guests</li> </ul>	<ul style="list-style-type: none"> <li>• Turnover of guests presents safety issues for neighbours and communities</li> <li>• Short-term rentals should take safety precautions and be inspected</li> <li>• Short-term rentals should have insurance that covers commercial activity</li> <li>• Need increased safeguards like ID verification of guests</li> <li>• City should have access to guest registry</li> <li>• There is no background check on guests</li> <li>• Short-term rentals in condos presents maintenance and security issues</li> <li>• Fire and building safety a concern</li> <li>• Public education on potential safety issues</li> <li>• Hold platforms accountable for safety issues</li> </ul>

## Results and analysis from stakeholder meetings

### Summary of targeted stakeholder meetings

This section summarizes comments heard during meetings held with five groups of stakeholders between April 3 and April 10, 2017: neighbourhood, housing and community groups; corporate housing providers; short-term rental providers; hotels, motels and B&Bs; and condominium representatives. During these meeting, staff asked two of three questions below, depending on applicability to the group:

- Tell us about your industry and how it operates in Toronto.
- What are your experiences with short-term rentals?
- The City is considering developing new rules for short-term rentals in Toronto. What issues should the City consider? What kind of regulations should the City consider?

This document highlights key areas of agreement and disagreement amongst the stakeholders and then provides a one-page summary of each of the five stakeholder groups, organized by discussion question.

#### Areas of agreement

- Existing rules around short-term rentals are confusing and outdated.
- Short-term rental industry should be regulated.
- Short-term rentals that occur in a principal residence and are not in condominiums cause minimal problems and do not need as much regulation.
- A licensing/registration system for short-term rental operators may be appropriate to ensure operators follow basic safety rules and pay appropriate taxes.
- There should be consequences for bad operators.
- Short-term rental platforms should share information with the City.

#### Areas of disagreement

- If operators are licensed or registered, question of whether fire inspections, number of nights rented and other requirements should determine eligibility.
- Whether short-term rentals occurring in units that are not the principal residence of the owner should be permitted, and if permitted, whether they should be considered commercial activity (and pay commercial property tax).
- Whether short-term rentals have an impact on the availability and affordability of housing.
- Whether short-term rentals, as they are currently operating, have a net positive or negative impact on tourism and the economy.
- Whether short-term rentals should pay a higher lodging tax than hotels.
- Whether short-term rental platforms should be licensed and/or held accountable for actions of operators.
- Whether short-term rentals should be permitted in condos.
- Whether the City has a role in enforcing condo declarations, bylaws and rules regarding short-term rentals.

## Group: Neighbourhood, housing and community groups

Organizations represented	Comments
<ul style="list-style-type: none"> <li>• ACTO (Advocacy Centre for Tenants Ontario)</li> <li>• Resident from Bleecker St</li> <li>• Greater Toronto Apartment Association</li> <li>• Landlord Self-Help Centre</li> <li>• Aberdeen Avenue Residents' Group</li> <li>• WPRA</li> </ul>	<p><b>Experiences</b></p> <ul style="list-style-type: none"> <li>• Short-term rentals are generally causing issues in neighbourhoods.               <ul style="list-style-type: none"> <li>- The characters of neighbourhoods are changing.</li> <li>- Visitors are not respectful about noise, garbage and parking.</li> <li>- Neighbours felt unsafe because they do not know the visitors.</li> </ul> </li> <li>• It is difficult to get short-term rental issues addressed by City and/or platforms.               <ul style="list-style-type: none"> <li>- Process is confusing and must deal with ML&amp;S and Police (for noise).</li> <li>- ML&amp;S did not act fast enough to address the issue.</li> <li>- Airbnb does sometimes delist problem properties, but operators use pseudonyms or another platform.</li> </ul> </li> <li>• Generally, apartment building landlords rent for more than 30 days. However, tenants are doing short-term rentals without landlord's permission of the landlord (as required in the RTA). Landlords find it hard to take action on this.</li> <li>• The short-term rental market is disincentivizing long-term renting.               <ul style="list-style-type: none"> <li>- Tenants are being illegally evicted so landlords (claiming a no-fault eviction) can rent short-term.</li> <li>- Rooming houses and other low-income housing are being converted to short-term rental hostels.</li> <li>- Small scale landlords are renting secondary suites short-term rather than long-term.</li> </ul> </li> </ul> <p><b>Ideas and concerns for regulation</b></p> <ul style="list-style-type: none"> <li>• Short-term rentals should only be permitted in a principal residence.</li> <li>• Short-term rentals should be licensed/registered to ensure properties follow the Building Code and Fire Code and allow City to monitor problem properties more easily.</li> <li>• The licence/registry should require tenants obtain permission from landlords.</li> <li>• The City's rules should not depend on one platform alone, but should address the industry holistically.</li> <li>• Short-term rental platforms should be licensed.</li> <li>• There are differing opinions on whether tenants should be permitted to do short-term rentals               <ul style="list-style-type: none"> <li>- Some said <i>should be permitted</i> so that tenants also have the opportunity to make income.</li> <li>- Some said <i>should not be permitted</i>, since owners have more oversight of their property.</li> </ul> </li> <li>• The City should host a prohibited condo list and should not license/register operators in those buildings.</li> <li>• Platforms should be required to share information. Also, they City should consider using scraped data rather than data from Airbnb since it may be more reliable.</li> <li>• Any rules and regulations developed should be enforceable.</li> <li>• The public needs time to respond to the City's approach. One week is not enough.</li> </ul>

## Group: Corporate housing providers

Organizations represented	Comments
<ul style="list-style-type: none"> <li>• Minto Properties</li> <li>• DelSuites</li> <li>• Tridel</li> <li>• Toronto Furnished Apartments Ltd</li> <li>• Premier Suites</li> <li>• Corporate Housing providers Association (CHPA)</li> <li>• Custom Home Interior/Corporate Housing Interiors Ltd</li> <li>• First Service Residential (property management)</li> <li>• Rosemont Residences</li> <li>• Urban Flats Toronto</li> <li>• Fine &amp; Deo</li> <li>• Today Living Group</li> <li>• City Gate Suites</li> </ul>	<p><b>Industry info</b></p> <ul style="list-style-type: none"> <li>• Corporate housing providers serve other businesses, not individuals. Providers most commonly provide housing for people relocating for work (employers often offer 30 days of accommodation covered and work through a corporate housing provider). <ul style="list-style-type: none"> <li>– Providers offer furnished apartments for a minimum of 30 days, also provide other services (ex: support finding schools for children).</li> <li>– The average stay is 55 days.</li> <li>– Renting for less than 30 days would have financial tax implications that mean it is not economical (HST requirements, mortgage assessment, property tax assessment).</li> <li>– Providers usually do not provide daily cleaning, do not provide towel service.</li> </ul> </li> <li>• Corporate housing rentals are generally governed by the Rental Tenancies Act.</li> <li>• Companies both own and lease rental units. When leased, they do so with the full permission of the condominium association.</li> <li>• The majority of stock in Toronto is in condominiums</li> <li>• The industry has an accreditation organization that accredits individuals and companies, companies are assessed by a third party</li> </ul> <p><b>Ideas and concerns for regulation</b></p> <ul style="list-style-type: none"> <li>• A clear definition of short-term rental is needed; it should align with other regulations. <ul style="list-style-type: none"> <li>– Recommended definition: less than 30 consecutive nights rented</li> </ul> </li> <li>• The City should consider safety issues, mortgage issues, and unique position of condo boards (recommend different rules for condos compared to houses).</li> <li>• Residential buildings were not designed for the kind of use resulting from short-term rentals.</li> <li>• Short-term rentals facilitated on platforms like Airbnb may have more fraud issues.</li> <li>• Rules should not differ based on location in City</li> <li>• The City should consider grandfather clauses if permissions change in condos.</li> <li>• The City should consider the enforceability of regulations.</li> </ul>

**Group: Short-term rental providers**

Organizations represented	Comments
<ul style="list-style-type: none"> <li>• Airbnb</li> <li>• Sonder</li> <li>• Expedia</li> <li>• ManageAir</li> <li>• H&amp;P Properties</li> <li>• Private residents operating short-term rentals in their homes and investment properties</li> </ul>	<p><b>Experiences</b></p> <ul style="list-style-type: none"> <li>• Hosting has provided people with more income and an opportunity to run a business.</li> <li>• Hosting has provided an opportunity to meet interesting people and act as ambassadors to Toronto.</li> <li>• Hosting has been a meaningful personal experience.</li> <li>• Due to vigilance and certain requirements, operators have not had serious problems with their guests.</li> <li>• Some operators are not aware of existing bylaws regarding short-term rentals; others found the existing rules confusing. They felt the definition of tourist home does not accurately capture what they do and is confusing.</li> </ul> <p><b>Ideas and concerns for regulation</b></p> <ul style="list-style-type: none"> <li>• Generally, operators would like to be "above the board" with their rental activity and will follow rules that the City creates.</li> <li>• Short-term rentals should be considered to be residential use, not commercial use.</li> <li>• Operators should be accountable for bad behaviour at their properties.</li> <li>• It may be difficult to designate certain properties as residential or commercial, as the use may change throughout the year.</li> <li>• Operators can pay appropriate taxes but should not be required to pay a short-term rental tax that is higher than the hotel tax. The tax could go towards affordable housing.</li> <li>• Operators are comfortable with licensing/registration and would pay associated fees.</li> <li>• Licensing/registration fees should be used to cover enforcement costs for bad operators.</li> <li>• Operators should be held accountable for activity at their short-term rental ("three strikes and you're out").</li> <li>• The City should not use a night cap, as this would be difficult to enforce and would likely capture certain operators unfairly.</li> <li>• Regulatory regime should address operators differently depending on their activity.</li> <li>• Operators are comfortable with additional safety requirements.</li> <li>• The public needs time to respond to the City's approach. One week is not enough.</li> </ul>



## Group: Hotels, motels and B&Bs

Organizations represented	Comments
<ul style="list-style-type: none"> <li>• Greater Toronto Hotel Association</li> <li>• Ontario Restaurant, hotel and motel association</li> <li>• Silver Hotel Group</li> <li>• Federation of Ontario Bed and Breakfast Accommodation (FOBBA)</li> </ul>	<p><b>Industry info</b></p> <ul style="list-style-type: none"> <li>• There are around 25,000 hotel rooms in Toronto. There are less rooms now than in 2000.</li> <li>• The hotel industry provides good jobs for residents. The nature of jobs created by the hotel industry are not the same as the nature of jobs created with short-term rentals.</li> <li>• Generally, the hotel industry is supportive of competition but wants all players to be regulating fairly.</li> <li>• The hotel industry is concerned about the current incentives to invest in hotels.</li> <li>• B&amp;B industry               <ul style="list-style-type: none"> <li>- There are around 50 B&amp;Bs listed on B&amp;B Canada in Toronto, only 2 are part of FOBBA.</li> <li>- FOBBA has its own definition of B&amp;B: less than 28 days, operator must be owner and owner must be present at property, must provide breakfast</li> <li>- There are around 2,000 B&amp;Bs in Ontario; 350 are members of FOBBA.</li> <li>- Municipalities have different approaches to regulating short-term rentals. There are more regulations where municipalities rely more heavily on tourism.</li> <li>- FOBBA requires B&amp;Bs to have commercial liability insurance and receive inspections by third party.</li> <li>- Most B&amp;Bs are assessed as residential for property tax purposes.</li> </ul> </li> </ul> <p><b>Ideas and concerns for regulation</b></p> <ul style="list-style-type: none"> <li>• The City should encourage investors to build hotels (rather than only condos).</li> <li>• Short-term rentals should be regulated. This includes creating a licensing framework for platforms and holding them accountable. Platforms should be required to sharing information with the City.</li> <li>• Home sharing should be differentiated from commercial activity. Activity happening in investment properties is not home sharing and should be regulated as such.</li> <li>• City should consider banning rentals of less than 30 days during the condo approval process.</li> <li>• City should consider impact of short-term rentals on neighbourhoods and condo communities.</li> <li>• City should consider human trafficking issues. Hotel industry is being proactive regarding human trafficking, but short-term rental platforms are not.</li> <li>• Platforms should pay appropriate taxes. This includes requiring that the platforms collect HST.</li> <li>• FOBBA supports the creation of definition for B&amp;B.</li> <li>• The public needs time to respond to the City's approach. One week is not enough.</li> </ul>

## Group: Condominium representatives

Organizations represented	Comments
<ul style="list-style-type: none"> <li>• Number of condo board representatives (Festival Towers Condo Board, etc)</li> <li>• Brookfield Condominium Services</li> <li>• Liberty Village Residents Association</li> <li>• Canadian Condominium Institute</li> <li>• CAI Canada</li> <li>• Eagle Audit Advantage</li> <li>• Condo Owners Association</li> <li>• Bloor Street Neighbourhood Association</li> </ul>	<p><b>Experiences</b></p> <ul style="list-style-type: none"> <li>• When short-term rentals occur, residents are concerned about:               <ul style="list-style-type: none"> <li>– Sense of community in building.</li> <li>– Security concerns (not knowing who lives in the buildings, strangers in building).</li> <li>– Wear and tear of building (guests are using common areas and may not know or follow rules). This could result in higher common expense fees for everyone in building, not just those doing short-term rentals.</li> <li>– Noise during loud parties.</li> <li>– Criminal activity.</li> </ul> </li> <li>• It is very difficult for condo boards to enforce existing condo rules.</li> <li>• Some declarations do not allow the bylaws or rules to restrict ability to rent, and if a majority of condo owners want to change the declaration, it is difficult as 80% of owners must consent.</li> <li>• Some felt that the Condo Act should be changed to allow declarations to be changed more easily, while some felt existing rules should remain the same.</li> <li>• Airbnb has not cooperated with condo board when they do not want short-term rentals in their buildings as they have not share information about addresses.</li> </ul> <p><b>Ideas and concerns for regulation</b></p> <ul style="list-style-type: none"> <li>• Platforms should share the location of short-term rentals so that condo boards can enforce.</li> <li>• Short-term rental operators should be licensed or registered with the City.</li> <li>• The City should prioritize community building over tourism as it is more important to build and maintain existing strong communities.</li> <li>• Some felt the City should keep a prohibited condo list. Others were concerned about certain buildings that banned rental restrictions more than ten years ago, as these buildings likely created those rules without imagining the current short-term rental market.</li> <li>• Some felt the City should ban all short-term rentals in condos via the development application process.</li> <li>• The public needs time to respond to the City's approach. One week is not enough.</li> </ul>