December 5, 2017

Via Email: clerk@toronto.ca

Dear Mayor Tory and Members of City Council:

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

We write in support of the above Amendments to regulate short-term rental accommodation in order to protect the rental housing market and our residential neighbourhoods.

One only needs to read the November 28, 2017 Toronto Star article “Rental vacancy rates lowest in 16 years” to comprehend what an important decision you are making today. In that article the journalist cites the high cost of a home in Toronto forcing more families to seek and remain in rental accommodation coupled with the GTA’s overall vacancy rate of only 1.1 per cent, the lowest in 16 years verified by the Canada Mortgage and Housing Corp whose latest report cites the rise in rental fees and decline in available apartments.

To safeguard our rental housing market, regulations need to be devised to allow for effective, uncomplicated, timely and straightforward enforcement. Any and all costs for the program should be fully offset by user fees.

Short-term rental regulations should include:

- a principal residence requirement for hosts;
- the City require up-front, mandatory proof of principal residence;
- a city-run licensing and registration program that is fully funded by the program;
- strong enforcement language to ensure compliance by both hosts and the rental companies;
- the prohibition of secondary suites (like basement apartments and laneway housing) from the short-term rental market;
- the City require short-term platforms (like Airbnb) to only list valid city-permitted properties on their sites (can’t display 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”.

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

Your truly,
Linda McCarthy, Vice-President