

June 19, 2017

**SUBMISSION TO THE EXECUTIVE COMMITTEE OF THE CITY OF TORONTO
ON PROPOSED REGULATIONS FOR SHORT-TERM RENTALS
ITEM EX26.3**

This submission is made on behalf of the Advocacy Centre for Tenants Ontario – a community legal aid clinic with a provincial mandate to advance and protect the interests of low-income tenants.

We are writing in support of the recommendations contained in the Staff Report of June 7, 2016 proposing by-law amendments and public consultation on regulation of short-term rentals. We have two concerns that we ask you to address before this process begins.

As we pointed in our submission to you last October, Toronto is bearing the brunt of Ontario's affordable housing crisis and we will never meet our housing needs if we permit the erosion of the existing supply of rental units. We believe that the staff recommendations, with some changes, form a realistic approach to controlling that erosion.

First, we do not support a zoning framework that permits short-term rentals in lawful secondary suites. These units have been a major source of new rental housing and have generally been affordable to a broad range of tenant households. City and provincial policies have been specially crafted to support their creation. That effort should not be undermined by permitting them to be taken off the long-term rental housing to be used as transient accommodation.

Secondly, while we strongly support the limiting of short-term rentals to the principal residences of owners and tenants, we do not believe that the provisions for demonstrating that these units are principal residences are adequate. We recommend that clear requirements be set out that provide third-party verification, ideally from a government source, to ensure that this important limitation on transient use is respected. We believe that the experience in other jurisdictions shows that strong oversight is necessary.

Thank you for considering our views on this important issue and we look forward to participating in further discussions of these matters at the proposed public meetings.

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