

**From:** [Hasnain Hasan](#)  
**To:** [Licensing and Standards Committee](#)  
**Subject:** Re: Short Term Rental Housing  
**Date:** Thursday, November 9, 2017 6:29:45 PM

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Dear Julie Levertu,

I am not sure if you could help me, but if you could, I would be grateful to you.

I work for Toronto Furnished Living as a Manager, and we are extremely concerned about the regulations expected to come into effect to regulate the short term rental market.

Our business is to provide short term rental apartments to a wide variety of clients ranging from newly arrived immigrants to English language students to business executives. Our business is a good alternative to someone looking to find an alternative to a hotel and save money on accommodation. Many times, our clients initially reserve our apartment for a week or more and then extend their stay for a month. From what we are sensing, the City will restrict the short term stay that is less than 28 days. This will have a **severe negative impact** on our business. Not only our business, but our stakeholders connected to our business (suppliers, regular clients, employees) will be affected as well. Indirectly, this proposal will also affect tourism and will cause hardship to many newly arrived immigrants, or out of service workers who prefer to stay in an apartment as opposed to a hotel on a week to week basis.

We have been in business since 2005. We are one of the oldest short term rental companies in Toronto. We have always paid our due share in terms of taxes, and operated our business as per the current rules and regulations. We find it extremely unfair that after establishing our business for more than 10 years we are now faced with a great uncertainty for the future of our business due to a heavy lobby mainly from the hotel industry. Our business model is different and we do not compete with hotels.

As a business, we already face slow and busy season. During winter months, the demand of our business slows down substantially, so we rely on renting our apartments for a shorter duration to cover our expenses.

Please advise as to what my options are to discuss my point of view with the City. I look forward to your response.

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**From:** [Hasnain Hasan](#)  
**To:** [Licensing and Standards Committee](#)  
**Subject:** Re: Short Term Rental  
**Date:** Monday, November 13, 2017 4:23:00 PM

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Dear Members of the Licensing and the Standard Committee,

In regards to the short term rental business, below are some additional points that are extremely important for the city to review before making any decision that could have an impact on the short term rental market.

1. Many short term rental companies like ours do not rely on Airbnb and other short term rental websites. They get businesses mainly through the word of mouth publicity, marketing their services to foreign travel agents, multi national companies, English language schools etc.
2. Regulating the short term rental market will have a little to no impact on the housing affordability crisis. The short term rental companies face a very low season from November to February. During this season, their vacancy rate is unusually high, as immigrants, international language students etc mainly come to Toronto from March to October. Even many Canadian companies that rely heavily on temporary foreign workers do not recruit them in the winter months. Due to poor demand, many short term rental companies who rent apartments from the landlords end their leases in the winter months.
3. Since any stay that is longer than 30 days is tax exempted, the city of Toronto will get less revenue in taxes if it prohibits the short term stay for less than 30 nights. Fewer tax collection means less money for the city to spend on otherwise very important areas such as:
  - i. infrastructure- Almost all roads in Scarborough and other areas in the city need urgent repairs.
  - ii. transit- Street cars, and trains malfunction on a regular basis increasing the commute time of workers
  - iii. health care- The wait time to see a specialist or even a family physician on the weekends or in the evenings continues to show no signs of improvement

Our city is cash strapped, and must avoid taking any steps that could affect the people of Toronto in terms of the services they expect to receive.

Below are the benefits of the short term rental market for the City:

1. Newly arrived immigrants, and out of town workers need an alternative to a hotel while they look for a permanent accommodation. Since these people come to Toronto to start a new life, they already have many financial decisions to make. When these people book an apartment for a week or two, not only do they get the option of deciding whether they should extend their stay depending on whether they like the neighbourhood and the apartment, they also do not have to end up spending the first and the last month rent. Many of our clients due to financial hardships initially stay with us for a week, and then end up staying on a month to month basis until they have saved enough money to move in to a place for a long term stay that meet their needs. Our city relies heavily on newly arrived immigrants and out of town workers since a vast majority of baby boomers are expected to retire within the next ten years causing an undue pressure on the city's limited resources. The influx of new immigrants, and people from out of town can help counter this undue pressure on city's resources.
2. When owners list an apartment or their home for short term rental, they earn an extra money to supplement their income to cover some living expenses of their children and other family members. Our household debt is one of the highest in the world, and an extra income will not only help families reduce their debt, they will also provide a much needed short term accommodation service.

Our recommendations to regulate the short term market:

1. Since critics like Airbnb and many hotel lobbies often claim that properties listed on Airbnb and other vacation websites often turn private residences in buildings into 'ghost hotels', the city should consider introducing fees for each unit to be converted into a short term rental housing to limit the transformation.
2. Hosts MUST reside locally if they intent to rent out their properties. They or their representative should meet the guests at the time of check in. Our research has indicated that the neighbours' peace is mainly compromised when the guests sense that

the owners or his or her representatives will not be meeting them during their stay.

3. The city should impose a fee on owners or companies for each property they list on the short term website. Many owners buy a property for investment purpose and end up renting it out unfurnished on a long term basis. These owners do not have any interest on listing these properties on these websites mainly because of their time constraints.

Last but not the least, even before AIRBNB came into existence, our company was providing the short term rental services to anyone looking for an alternative to a hotel to save money on accommodation, we find it extremely unfair that today our business is at stake mainly because groups like Fairbnb and other hotel lobbies want the City to develop rulings that actually benefit them by presenting facts that are not only misleading but actually harmful for city's growth in the long term.

Thank You

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