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April 2, 2024

Toronto City Council & Planning and Housing Committee c/o Nancy Martins  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2  
via email at [phc@toronto.ca](mailto:phc@toronto.ca)

RE: PH 11.9 Short-Term Rental By-law Implementation Update

To whom it may concern, City of Toronto:

The Corporate Housing Providers Association (CHPA) and our members extend our heartfelt gratitude for your inclusive and thoughtful approach to discussing the Short-Term Rental By-law Implementation. CHPA, founded in 1996, is the globe's largest international trade association dedicated to the corporate housing industry and represents professional providers of temporary housing services as an established industry. We applaud the report of the Executive Director, Municipal Licensing and Standards.

As noted in the Executive Director's report on page 38, the "staff recommend that City Council request additional direction from the Province to clarify the criteria the Landlord and Tenant Board would employ to determine whether a medium-term rental tenancy is subject to the RTA." CHPA is happy to participate in this discussion to help provincial and city officials better understand the industry and the vital services our members provide to Toronto, and the greater province. We support the committee and City Council's goal of a balanced, fair and vibrant housing market in Toronto and hope to serve as a resource in continued dialogue and partnership.

In addition to the Executive Director's report, CHPA appreciates the work and reporting of David Wachsmuth and the team at McGill University. While CHPA is aligned with several items in the report, it is important to note we were not consulted in collecting information to create the report. As the leading association for the corporate housing industry globally, we can provide clarity on defining the industry, market size estimation, demand stability, platform misrepresentation and challenges other regulating bodies have overcome. These are important aspects to consider when identifying and defining this particular industry, and we believe this report misses important nuances of the "medium-term" market. Short-term rentals (STR) gained significant growth with the launch of online marketplaces such as Airbnb, but corporate housing is a well-defined, mature industry serving a wide variety of people seeking flexible accommodations.

As cities grapple with the rapid growth of the STR industry, discussions surrounding regulations and restrictions have become increasingly prevalent. While it's crucial to address concerns related to housing affordability, neighborhood disruption and regulatory compliance, it's equally important to recognize the valuable role of flexible accommodations in our communities. To achieve this balance, CHPA advocates for a collaborative dialogue between subject matter experts, regulating bodies and the communities they serve.

For nearly a decade, CHPA has contributed critical data and insights, definitions, economic impact reports and balanced language to help cities and regulating bodies make more informed decisions that embrace

innovation while fostering community growth. CHPA hopes to serve as a consultative partner to the City of Toronto to forge a path forward that embraces the positive contributions of the STR industry while addressing the challenges in a thoughtful and inclusive manner.

Thank you for the opportunity to engage in this important dialogue to support the City of Toronto.

Regards,



Nick Estrada, CAE, CMP  
Chief Executive Officer