

Hildebrandt, Tina

From:

s. 22(1) Personal and Confidential

Sent:

Thursday, October 26, 2017 7:56 PM

To:

Public Hearing; s. 22(1) Personal and Confidential

Subject:

Regulating short term rentals in Vancouver

I am unfortunately unable to attend the hearing tonight. I would like to submit my comments for the Mayor and Council's consideration.

I do support the application to regulate short term rentals. I thank the Mayor, Council and City staff for the work and focus to address this issue.

As a manager of an all suite hotel in Vancouver which is locally owned with long term staff, I am familiar with the guest experience as well as the operational aspects of full suite short term rentals. The difference is, we have rules and safeguards in place for the customer and support for building and suite issues that may arise. Our hotel operates with the "live local" tagline. Our guests feel that our hotel is **their** home away from home and are not living in someone else's home.

People choose our hotel based on the level of cleanliness, the ability to have privacy, support in the event of an emergency or maintenance, consistency in the experience and offering, guaranteed quality of amenities, flexibility in cancellation / changes, housekeeping service and extras such as transportation arrangements and restaurant/tour planning.

I would applaud short term rental hosts who take their role seriously and provide their guests with a level of comfort, cleanliness, noise control, maintenance and local insights.

There is room for both but there needs to be an appreciation of the small business aspect of running a STR.

I would like to make the following comments and suggestions:

- That the accommodations meet safety standards to protect the guests and the owners
- Their insurance must be appropriate for the use of the space
- They must have emergency and maintenance plans and liability protection in place for their customers to ensure guest safety
- They cannot be managed corporately. The license can only be issued and operated by the owner
- Owners of STR need to be accountable and for non-compliance there should be very high fines
- We need to close a loophole which would enable an owner to rent a unit on an annual lease and then authorize the fictitious tenant to rent the unit as a STR
- Consider a restriction or cap on the number of nights per month or year that the unit can be rented. Is there a number of nights per year that you have to reside in a unit for it to be deemed principle residence?

What I heard from speakers on Tuesday night is that many owners of single family dwellings in areas where hotels are not plentiful, like Kits, Grandview Woodlands, Hastings Sunrise and UBC, said they have basement and secondary suites which they like to rent out short term because they use them part of the year for adult children and family visits so having an annual renter is not favourable. Others said they wanted the higher income to offset their mortgage.

Perhaps it makes sense to consider a two-tier approach to licensing.

1/ Primary residence

2/ Secondary suite. These would generally be in single family dwellings where the use of space for STR is quite separate from the owner's residence. This should be taxed at a higher rate on that portion of space so their operating costs are more in line with commercial accommodations.

For example, this could involve a reporting process for the number of nights and percentage of the year the suite is used for STR. That portion of the year could have a higher property tax rate applied.

I would also suggest to council that they consider the bigger picture of small business development in Vancouver and look at revising the home based business license requirements, as this would open up opportunities for people to operate more non-invasive businesses from their homes.

Currently the first 2 points in licensing requirements are as follows:

1. A portion of the residence is to be used for a craft or occupation for administration purposes only.
2. No clients are permitted to attend the premises at any time.

We should make amendments to requirements 1 and 2 where the business could operate on a broader scale to allow actual services on site during specified hours (according to bylaws) and open up the scope of the type of business. In this realm of business, the owner is present while business is being conducted (such as consulting or training) which would lend itself to less opportunity for disruption to neighbours and property.

This change may move people away from wishing to rent beds in their home and promote small business with more benefits to our community.

Lastly, I wish to thank you for the effort and consideration in moving these regulations forward while prioritizing the livability and community in Vancouver

Jacqui McMullen

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Dear Mayor Robertson and Council,

We, UNITE HERE! Local 40, are supportive of the proposed regulations, including the primary resident requirement for secondary suites. We do however, feel the proposal lacks the regulatory teeth needed to be effective and urge the city to adopt a system of platform accountability as part of your enforcement strategy.

Our union represents thousands of hotel and airport workers that live and work in Vancouver. We are a member of the Fairbnb Coalition, a diverse group of stakeholders that are concerned about the negative impact short-term rentals are having on housing.

Our members consistently identify affordable rental housing as one of their major concerns, thus our focus on short-term rentals is first and foremost centered on housing affordability. Numerous studies have shown that short-term rentals like Airbnb are one of the forces responsible for removing units from the housing market. Secondary suites are home to thousands of our members. UNITE HERE is therefore supportive of staff's current proposal limiting short-term rental accommodations strictly to primary residences, including for secondary suites.

We are not opposed to home-sharing in principle. If someone occasionally wants to rent out a spare bedroom in their primary residence, or rent their apartment out for a couple of weeks while away on vacation, we believe they should be able to do that. Instead we see companies like Airbnb using the home-sharing label as a way to establish a decentralized network of "ghost hotels" in urban centers across North America, circumventing municipal zoning, avoiding regulation, and converting much needed housing units into income properties.

While arguments calling for more relaxed regulations come mostly from Airbnb hosts and company representatives, our union is only one of a diverse group of stakeholders including tenants, landlords, housing advocates, strata owners and their representatives, and others, all calling for the tightest possible regulation of short-term rentals.

Furthermore, while we support many of the provisions within the proposed regulations, we have some concerns about staff's proposed enforcement strategy.

Numerous other cities including Seattle and Amsterdam have attempted to regulate hosts, but the number of short-term rentals in those cities have continued to rise.

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Staff have also discussed the possibility of working with Airbnb and other platforms as partners in the city's enforcement strategy, but how will staff ensure that the platforms cooperate?

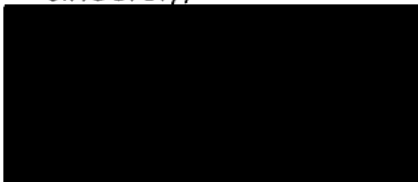
In San Francisco, after having realized little success with regulations targeting only hosts, the city enacted new regulations licencing the actual platforms themselves. Short-term rental companies are required to list only licenced hosts or face fines of \$1000 per day for each illegal booking transaction.

The city of Toronto's proposed short term rental regulations also include a licence for platforms and fines in cases of non-compliance.

Will Vancouver learn from the successes and failures of other cities?

Vancouver should join Toronto to include platform accountability in its regulations. The severity of the housing crisis in this city, the effect it has on working people, on youth, on tenants, and countless others, demands bold and immediate action.

Sincerely,



Robert Demand
President
UNITE HERE! Local 40