

[REDACTED]

From: Marylou Coyle [REDACTED]
Sent: July 30, 2024 10:36 AM
To: Legislative Services email
Subject: Fwd: Proposed changes to short-term rental bylaw

Sent from my brilliant iPhone

Begin forwarded message:

From: BRENT FURDYK [REDACTED]
Date: July 30, 2024 at 10:30:10 AM PDT
To: Marylou Coyle [REDACTED]
Subject: Fwd: Proposed changes to short-term rental bylaw

From: "BRENT FURDYK" [REDACTED]
To: "Marylou Coyle" [REDACTED]
Sent: Monday, July 29, 2024 6:51:46 PM
Subject: Proposed changes to short-term rental bylaw

1. Provincial legislation permits the part-time rental of one's primary residence on an occasional basis. However, we have been informed by the City of Victoria's STR bylaw office that the City has imposed its own interpretation of that legislation, interpreting "occasional" to just four bookings per year.

Our question is why? Why just four? What harm could possibly come to the city if we rent out our home five or six times, or 10, or whatever is appropriate during those occasions when we're away? We won't be there anyhow, so why should it be sitting empty when it could be generating revenue?

Who is this is meant to benefit? It certainly doesn't benefit homeowners, nor people visiting the city who are unable to find lodging when hotels are booked up.

More importantly, restricting the rental of the home we already live in to four bookings does NOTHING to address the city's shortage of housing. Unlike a former short-term rental that will hopefully be converted to a long-term rental, our home will remain our home, and will not be added to the pool of available housing.

From what we can see, the only beneficiaries are Victoria's hotels and your own bylaw inspectors, who can fill their days by enforcing an arbitrary rule that makes no sense and benefits nobody. With all the myriad problems facing Victoria, we find it stunning that his is how the City chooses to expend its taxpayer-funded resources.

2. Speaking of this four-booking-per-year limit, we can find no mention of it in any bylaw. That's because it doesn't actually exist. Upon investigating, we were informed that this alleged rule isn't actually a bylaw, but more of a suggestion. Even though it's not officially a bylaw, however, it's being enforced as if it is: "This definition has been upheld and enforced consistently since the inception of the Short-Term Rental Regulation Bylaw."

So, unless we are misunderstanding this, the City of Victoria has been actively enforcing a nonexistent bylaw, and presumably even issuing fines relating to it. How can the City justify punishing people for breaking a law that doesn't actually exist yet, and cannot be found within any municipal legislation? We find this to be nothing short of bizarre, and more than a little Orwellian.

3. The process of receiving an STR business licence is arduous, inefficient and unnecessarily lengthy. We applied for a business license at the beginning of April. We were finally granted said license on July 22 — nearly four months after applying. We had intended to rent my home during a trip in July that had been arranged months in advance, but were unable to do so because it took so extraordinarily long to obtain a business licence. We have come to believe, for various reasons, that this delay was punitive.

In our continued dealings with that office, it has become abundantly clear that the goal isn't to assist or serve the citizens of Victoria, but to put up bureaucratic roadblocks and endless unnecessary red tape to circumvent and thwart our efforts to play by the ever-shifting rules.

4. We would obviously like to try again when we'll be out of town in January, and have been told we will need to apply for another business licence next year. This is not a simple renewal, we were told, but will require starting the entire excruciating process all over again from scratch. Previous business licences I've held in other municipalities were renewed annually, so why are we expected to begin the whole thing over again? Do other businesses (restaurants, hotels, etc) have to do that as well, or is this specific to STR business licences.

Given how long it took to obtain our 2024 STR business licence, we would have to apply for a 2025 STR business licence NOW if we expect to have it in hand by January. However, there is no opportunity yet to apply for a 2025 licence, even though it takes nearly four months to receive one. So, once again, we will be prevented from renting out our home during our planned absence — which we've come to suspect is the City's hidden agenda, to make the process of renting out one's principal residence on a short-term basis to be so complicated and difficult, and the reward so limited, that most people won't bother to go through all the hassle.

5. When we applied for the licence, we were surprised to learn that an inspection was required. This delayed the process by a full month. We had assumed the purpose of the

inspection was to demonstrate that we actually live in our own home, but subsequently learned there was a far different agenda at play. During that "inspection," the bylaw inspector asked us a series of questions about when we planned to rent our principal residence, for what duration of time, etc. We responded by stating the truth: we weren't really sure, it would depend on our upcoming travel plans, which were up in the air, other than that one specific trip in early July. Our plan was and is to simply put our home up for rent during those occasions when we are away — nothing more, nothing less.

Later, we learned that the responses to this seemingly informal questionnaire constituted our "business plan," something the inspector neglected (purposely, I assume) to inform us. I found this to be sneaky and underhanded, intended to trip people up by locking them into a "business plan" in order to further delay the process and possibly even deny issuing a business licence because the supposed "business plan" doesn't adhere to the four-bookings-per-year limit — despite that limit's absence from any written bylaw.

We subsequently learned that one reason our licence took so long to grant was because the STR bylaw office was considering denying us due to concerns that our alleged "business plan" didn't align with the four-bookings-per-year bylaw. We said and did nothing to indicate anything that would lead to that assumption, and remain shocked that the inspector's interpretation of the very clear statements we made could be so off the mark. We would advise anyone who undergoes one of these inspections to record the conversation in order to prevent inspectors from making incorrect and untrue interpretations of what was stated.

Besides, to deny a short-term rental business licence based on an ill-conceived and unfounded suspicion that someone may not follow the rules is, frankly, unacceptable, the equivalent of arresting someone because you believe, with no evidence to back it up, that they might eventually commit a crime. Fine us if we break the law — but don't deny us a business licence because some bureaucrat incorrectly thinks we will.

And by the way, renting out one's principal residence four times per year is hardly a "business," and the notion that a "business plan" be required for such a picayune effort is ludicrous. In our opinion, the intention is clearly to dissuade anyone wishing to rent out their home on a short-term basis from doing so, as four bookings per year doesn't justify the amount of effort required to make one's home ready for rental.

6. I would also like council to acknowledge our very unique situation, in that our principal residence is situated within a strata hotel, the Victoria Regent.

Background: Our strata rents space to Victoria Regent Hotel Ltd., which owns none of the physical property or assets of the building. The entity is merely our tenant. Utilizing the lobby and other areas (all of which remain the property of our strata), the company operates in the same manner as a hotel, renting out suites on a nightly basis. The "hotel," however, owns none of the suites it rents; each of those suites is the property of an individual owner. Approximately half of the owners live in their units (resident owners), while the rest (non-resident owners) place them in the hotel's rental pool, so they can be rented out on a short-term basis, 365 days per year. From my understanding, this scheme fits the provincial government's definition of a strata hotel.

Another resident owner in our building who raised this issue with the STR bylaw office was instructed to speak with a representative of the strata hotel about being included under that licence type. That, however, is simply not an option in this situation. Any owners who wish to place their units in the rental pool must do so for the entire year, which effectively prohibits a resident owner from using their principal residence as a short-term rental under the auspice of the hotel's licence. If we were to do that, then our home would no longer be our principal residence, but would simply add one more short-term rental to the Victoria hotel market and leave us seeking a new principal residence. This would certainly be in contravention with the purported goal of creating a greater supply of long-term housing in the city.

The provincial government has provided an exemption for strata hotels (<https://news.gov.bc.ca/releases/2024HOUS0045-000437>). That exemption clearly states that strata hotels meeting the criteria to qualify for the exemption (as we assume the Victoria Regent has in order to keep operating as it is currently) are "exempt from the principal-residence requirement." In addition, it also states that the "exemption for strata hotels and motels is expected to apply to **all units** on the property, so there is **consistent treatment of all of the units for the entire property.**"

Therefore, in order to maintain that "consistent treatment of all the units," our unit receives that same exemption, as do all units in the building — both those being utilized as "hotel" suites, in addition to those that are the principal residences of owners. In our thorough assessment of the [news release](#), dated [March 27, 2024](#), we do not see any grey areas in this.

It's our understanding that a legal opinion is forthcoming regarding whether the city accepts that our unit must receive this exemption.

If it is the City of Victoria's determination that we are NOT eligible for this exemption, then it would follow that neither are the units being rented out by the entity known as the Victoria Regent Hotel Ltd. The language is explicit: nowhere is it stated that some units within a strata hotel are exempt and others are not.

If, however, the city has a different interpretation of this very clear statement, we would appreciate an explanation of how that conclusion was reached, the reasoning behind that decision, and how it fits within the provincial guidelines; it's one thing to "interpret" the province's STR regulations (as is the case with the nonsensical four-bookings limit) but denying our principal-residence exemption completely flies in the face of the province's legislation. Because this exemption applies to ALL units within the building, there is no legal reason of which we are aware why the rental of our unit — which still remains our personal residence — be limited to four bookings per year.

If the City determines that is not the case, then we will obviously abide by that decision; however, we would also expect that the business licence for Victoria Regent Hotel Ltd. be immediately revoked and fines issued, for providing short-term rentals in breach of both provincial and municipal regulations — if our unit does not receive the principal

residence exemption, then neither do the other units, which would mean that the Victoria Regent Hotel Ltd. has been operating illegally since [May 1, 2024](#).

The City of Victoria must recognize the highly unique status afforded to units within our building, and that all units within the building, including ours, are fully exempt from the principal residence requirement, and any associated restrictions.

Yours truly,

Dr. Marylou Coyle & Brent Furdyk

[REDACTED]

From: Brenda Dean [REDACTED]
Sent: July 29, 2024 8:51 PM
To: Legislative Services email
Subject: Bylaw amendment bylaw amendment no 24-060

Dear legislative Services

I am in full support of your proposed bylaw No 24-060- help clarify and strengthen local bylaws to come in line with provincial legislation.

Many thanks
Brenda Dean
1508-751 Fairfield Road
Victoria
Sent from my iPad

From: Brian Jacobsen [REDACTED]
Sent: July 29, 2024 12:27 PM
To: Legislative Services email
Subject: Aug 1 Council Meeting: Amend Bylaw NO. 24-060, Section 3 (e), to 180 Days

Legislative Services,

I am writing to request your support for the amendment to the current bylaw changes proposed in [Bylaw No. 24-060](#). The currently proposed changes in section 3 (e), speak to the Short Term Rental definition for principal residence operators, outlining a use of 4x calendar year, which are slated for “reading” on Thursday Aug 1, 2024.

The currently proposed changes state - Section 3 (e): “*The entire Principal Residence may be used for a Short-Term Rental while the operator is temporarily away provided that it is so used no more than four times in a calendar year.*”

A more straightforward definition for a Principal residence would be that which the provincial government outlines in the STRAA, which is defined as: [“the residence an individual lives in for a longer period during a calendar year than any other place.”](#) This could also be interpreted as 180 days per / calendar year.

This provincial government definition would be a clearer way to define a principal residence STR operator for several reasons.

1. The City of Victoria’s primary objective should be obtaining the **maximum utility** of every home in the City. In today’s day, individuals find themselves in unique housing situations, whereby they are away from their home for extended and sporadic periods of time. Limiting their ability to utilize their home’s as a STR to 4x per year, means we will have homes in our City sitting empty, providing no utility to the city, nor the owners of said properties. Here is non exhaustive list of examples of the sorts of living situations I am referring to, and in all of these scenarios a long term rental would not be feasible:
 - Working professions with intensive travel schedules, who’s work means they will find them away from their principal residence for a week or more in any given month.
 - Snowbirds who spend several winter months living in warmer climates for health and personal reasons.
 - Seafarers and other specialized workers, who spend months away from their home at various times throughout the year.
2. By allowing principal residence operators the ability to rent their home on short term rental platforms for a maximum period of 180 days in a calendar year, the City would be writing bylaws that are beneficial to its tourism needs and demands. Since the introduction of the STRAA, the city has lost hundreds of legal short term rental accommodations, and the impact on hotel pricing cannot be understated. The homes of principal residence owners could help provide much needed relief for our tourism accommodation sector, at a nightly lodging rate that is more palatable for their average British Columbian. Again, these are not homes that could or would ever be long term rental stock, so these

changes would **NOT** impact the province or cities efforts to address their vacancy rates, but **WOULD** provide relief for tourists visiting the City of Victoria; thus, providing the maximum utility of these properties.

3. The application of “4 times per year” is an ineffective way to distinguish the use of an owner's property as a short term rental. For example 4x / year could mean 4 separate rental occurrences of 29 days each, or 4 separate rental occurrences of 1 day each. Both examples would satisfy the definition, the former meaning a total of 116 rental days in a calendar year, and the latter meaning a total number of 4 rented days in a calendar year.
4. A departure from the province’s definition of a principal residence operator, may also mean that the City of Victoria would **NOT** benefit from the province’s enhanced reporting and enforcement which they intend to offer municipalities who align with the act. Creating a bylaw that is not aligned with the province’s definition would likely mean that the enforcement of the bylaw would lie solely on the Victoria bylaw staff, which would be a significant burden of cost and valuable resources.
5. The definition of 180 days, aligns with existing definitions for residency requirements, as well as insurance riders required for those principal residence owners who wish to rent their home as STR while they are away.
6. Finally, it should be noted that short term rental platforms such as Airbnb have the ability to add a nightly cap on listings, whereby they can enforce a predetermined maximum on any applicable listings. This is something that they are currently offering other municipalities, and it is my understanding it would be something they could also offer the City of Victoria. The Property Rights Association of BC could facilitate a meeting between Airbnb and the Victoria Bylaw team to discuss this option at more length.

In summary, aligning with the province’s definition of short term rentals as [“the residence an individual lives in for a longer period during a calendar year than any other place.”](#) (or 180 days), would be a clear win for a) the City of Victoria, b) Principal residence owners, c) Tourists of Victoria.

Should you have any questions, or would like to discuss the matter further, please feel free to reach me via email at [REDACTED] to arrange some time.

Kind Regards,

Brian J

Sent from [Outlook](#)

[REDACTED]

From: Ian Marsh [REDACTED]
Sent: July 29, 2024 1:02 PM
To: Legislative Services email
Subject: Proposed amendments to the zoning regulation bylaws and the short term rental regulation bylaws

Dear Mayor and Council Members,

We, the undersigned, believe in the intent of the provincial legislation to maximise the availability of housing units in BC. We therefore are in full support of the proposed bylaw amendments currently before Council. The STR group are loud and well organized and funded but at the end of the day it represents a small minority. Many are not even residents of BC, let alone of Victoria. They clearly do not advocate for the broader community. Even with the adoption of these amendments, the STR group will continue to own their housing unit (or sometimes multiple units) and will continue to be allowed to profit from renting these units though with some limitations.

Please vote in favour of the proposed amendments. Thank you.

Ian and Mary Marsh
904-708 Burdett Ave
Victoria, BC.
[REDACTED]

[REDACTED]

From: matt moore [REDACTED]
Sent: July 29, 2024 8:42 PM
To: Legislative Services email
Subject: Against strata hotels

I live in the Astoria at 751 Fairfield rd and I'm strongly against strata hotels. We need to ensure rent is as low as possible and allowing people/corporations to run dedicated STR rental businesses will continue to exacerbate the rental crisis.

Please don't allow str to exist in Victoria as it unfairly impacts the people that rent in the city and allows people and corporations to profit unfairly.

Regards
Mathew Moore

[REDACTED]

[REDACTED]

From: ROBERT NEWTON [REDACTED]
Sent: July 29, 2024 2:06 PM
To: Legislative Services email
Subject: Short Term Rentals

To whom it may concern:

I understand that there is a consideration of the rules surrounding the leasing of short term rentals coming before the Mayor and Council this week. This is a much needed action in light of the legislation passed by the Provincial Government last year. We definitely need to define the terms surrounding legal short term rentals as well as what a hotel is or is not. I thought that the Provincial Government made clear who could qualify as a hotel business, but some, including the condominium building I reside at, are making every effort to ignore the new legislation or to find ways of skirting it.

It is surprising that a small cadre of owners can over rule the majority and attempt to classify what was clearly built as a residential condominium building as a hotel. When I bought my unit here, I had looked at a unit in a strata hotel and decided that was not the type of building I would feel comfortable living in. Most of the owners feel as I do and I am sure the local hotels on our street do also.

Please go ahead with the new definitions and applicable zoning regulations so that the former short term rentals can either be rented long term or sold to young families starting out or to seniors looking to retire in relative peace and comfort in a location close to the amenities we need.

Thank you for your consideration,

Robert Newton
405-708 Burdett Avenue
Victoria, BC
V8W 0A8
[REDACTED]

From: Thomas Cowan [REDACTED]
Sent: July 29, 2024 10:37 AM
To: Marianne Alto (Mayor); Victoria Mayor and Council; Marg Gardiner (Councillor); Susan Kim (Councillor); Chris Coleman (Councillor); Krista Loughton (Councillor); Jeremy Caradonna (Councillor); Matt Dell (Councillor); Stephen Hammond (Councillor); Dave Thompson (Councillor); Legislative Services email
Subject: Aug 1 Council Meeting: Amend Bylaw NO. 24-060, Section 3 (e), to 180 Days
Follow Up Flag: Follow up
Flag Status: Flagged

To whom it concerns!

I am writing to request your support for the amendment to the current bylaw changes proposed in [Bylaw No. 24-060](#). The currently proposed changes in section 3 (e), speak to the Short Term Rental definition for principal residence operators, outlining a use of 4x calendar year, which are slated for “reading” on Thursday Aug 1, 2024.

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This provincial government definition would be a clearer way to define a principal residence STR operator for several reasons.

1. The City of Victoria’s primary objective should be obtaining the **maximum utility** of every home in the City. In today’s day, individuals find themselves in unique housing situations, whereby they are away from their home for extended and sporadic periods of time. Limiting their ability to utilize their home’s as a STR to 4x per year, means we will have homes in our City sitting empty, providing no utility to the city, nor the owners of said properties. Here is non exhaustive list of examples of the sorts of living situations I am referring to, and in all of these scenarios a long term rental would not be feasible:
 2.
 - Working professions with intensive travel schedules, who’s work means they will find them away from their principal residence for a week or more in any given month. Snowbirds who spend several winter months living in warmer climates for health and personal reasons. Seafarers and other specialized workers, who spend months away from their home at various times throughout the year.
 -
2. By allowing principal residence operators the ability to rent their home on short term rental platforms for a maximum period of 180 days in a calendar year, the City would be writing bylaws that are beneficial to its tourism needs and demands. Since the introduction of the STRAA, the city has lost hundreds of legal short term rental accommodations, and the impact on hotel pricing cannot be understated. The homes of principal residence owners could help provide much needed relief for our tourism accommodation sector, at a nightly lodging rate that is more palatable for their average British Columbian. Again, these are not homes that could or would ever be long term rental stock, so these changes would **NOT** impact the province or cities efforts to address their vacancy rates, but **WOULD** provide relief for tourists visiting the City of Victoria; thus, providing the maximum utility of these properties.

Renting out my home while away at work IS MY WAY OF HAVING AFFORDABLE HOUSING and isn't that the purpose of the STRAA ?

- 2.
3. The application of "4 times per year" is an ineffective way to distinguish the use of an owner's property as a short term rental. For example 4x / year could mean 4 separate rental occurrences of 29 days each, or 4 separate rental occurrences of 1 day each. Both examples would satisfy the definition, the former meaning a total of 116 rental days in a calendar year, and the latter meaning a total number of 4 rented days in a calendar year.
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In summary, aligning with the province's definition of short term rentals as ["the residence an individual lives in for a longer period during a calendar year than any other place."](#) (or 180 days), would be a clear win for a) the City of Victoria, b) Principal residence owners, c) Tourists of Victoria. The 180 days also aligns with Toronto and other cities around the world.

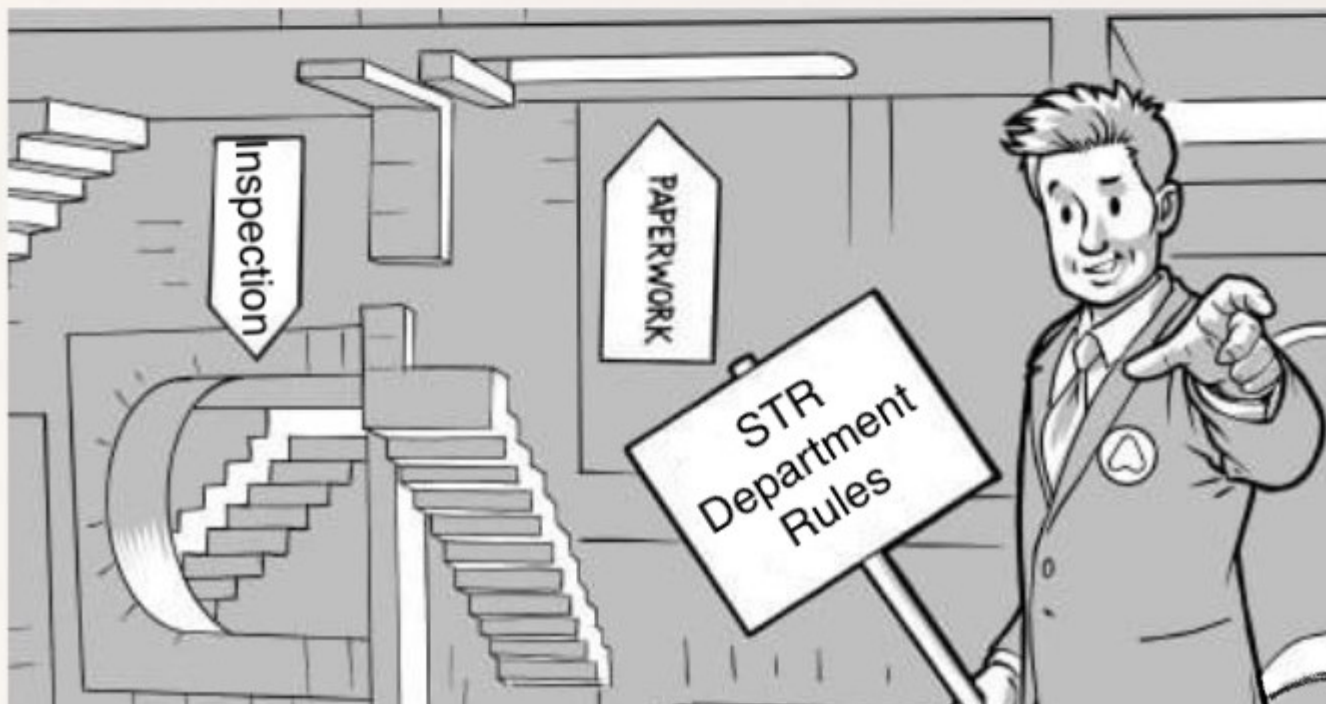
Should you have any questions, or would like to discuss the matter further, please feel free to reach me at [REDACTED]

[REDACTED]
Kind Regards,
Thomas Cowan

It's confusing to navigate
rules between the
and the municipalities

Let's keep it simple

180 days a year or just follow the BC



TO: Legislative Services, City of Victoria (legislativeservices@victoria.ca)
PUBLIC NOTICE RESPONSE TO CITY COUNCIL AUGUST 1, 2024
RE: Zoning Regulation Bylaw Amendments - #24-060
Zoning Bylaw 2018 Amendments- #24-060
Short-Term Rental Regulation Bylaw, Amendment Bylaw (No. 1) - #24-059

Dear Mayor and Council,
I strongly encourage you to approve the proposed STR Regulation Bylaw Amendments, the Zoning Regulation Amendments and the Zoning Bylaw 2018 Amendments that you have circulated for public response as they are written.

Thank you.

Bruce Spracklin
Name

Address

6004 - 751 Fairfield Rd
Victoria BC
V8W 4A4

TO: Legislative Services, City of Victoria

RE: PUBLIC NOTICE RESPONSE TO CITY COUNCIL

RE: Zoning Regulation Bylaw changes - #24-050
Short-Term Rental Regulation Bylaw changes - #24-059

Dear Mayor and Council

I am writing to inform you that **I support** the proposed changes to the City of Victory STR Regulation Bylaw and Zoning Bylaws presently before you to be presented to City Council on August 1.

I recognize that there is an acute housing shortage and that it is urgent that we better utilize available housing to support Victoria residents.

I strongly encourage you to approve the proposed to the STR Regulation Bylaw Amendments, the Zoning Regulation Amendments and the Zoning Bylaw 2018 Amendments that you have circulated for public response.

Thank you for your consideration.

Liza Bialy and Donald Moar
#702-707 Courtney Street
Victoria, BC
V8W 0A9

TO: Legislative Services, City of Victoria (legislativeservices@victoria.ca)

PUBLIC NOTICE RESPONSE TO CITY COUNCIL AUGUST 1, 2024

RE: Zoning Regulation Bylaw Amendments - #24-060

Zoning Bylaw 2018 Amendments- #24-060

Short-Term Rental Regulation Bylaw, Amendment Bylaw (No. 1) - #24-059

Dear Mayor and Council,

I strongly encourage you to approve the proposed STR Regulation Bylaw Amendments, the Zoning Regulation Amendments and the Zoning Bylaw 2018 Amendments that you have circulated for public response as they are written.

Thank you.

Linda Geddes

John Boyle

1805-751 Fairfield Road, Victoria BC, V8W 4A4

From: Victoria Mayor and Council
Sent: July 30, 2024 11:13 AM
To: Councillors
Cc: Legislative Services email
Subject: FW: Astoria building - long term rentals

Good Morning Council,

Please see email below.

Thank you,

Correspondence Coordinator
Communications and Engagement
City of Victoria
1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees Nation and Xwsepsum Nation.

From: Brenda Dean
Sent: Monday, July 29, 2024 9:50 PM
To: Victoria Mayor and Council <mayorandcouncil@victoria.ca>
Subject: Astoria building - long term rentals

To the mayor and Council

The Astoria building had approx 40 short term rentals prior to May 1, 2024

Our building hosted a social for the residents of our building this past month.

Having 167 strata lots, we had our usual 40 participants. What was wonderful to learn is that 9 of the couples or individuals that attended were new residents to the building. That number can really only be a great indicator that the provincial STR legislation is having a positive impact on opening up more long term rentals.

Having said that, unfortunately there are still many guests arriving here daily. It's frustrating and very unfair to owners that are in compliance with the new legislation.

Please vote to approve the proposed bylaw amendments. 24-059 and 24-060.

Should the Falls building be permitted to become a Strata Hotel, that would create complete chaos in all of the residential buildings that permitted STR (in the past).

In closing, when Strata owners originally agreed to allow STR's in pie building, NO ONE could have know the impact on our residential communities and obviously the removal of long term rental units from the rental market.

Thank you for your time
Regards
Brenda Dean
1508 -751 Fairfield Road
Victoria