

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:20 AM  
**To:** Legislative Services email  
**Cc:** Lisa Helps (Mayor)  
**Subject:** Airbnb / Home Sharing

City of Victoria,

Airbnb and home sharing is a detriment to the hotel industry in Victoria.

As a former personal information Harbour Towers Hotel & Suites, I know first-hand the impact that these unregulated businesses have had on our city.

Throughout 2016 — a year of booming numbers in Victoria's tourism industry — hotels saw a decline in occupancy rates (2-3% year over year), despite increases in visitor numbers. Airbnb is the platform that swallowed this growth.

Not only did private businesses suffer (including Harbour Towers, whose owners ultimately saw more return in a conversion to an apartment building amidst these record-breaking numbers), but the city and province suffers. Evading GST, PST and accommodation taxes, these unregulated home sharing businesses get an unfair advantage against traditional accommodation services, and governments miss opportunities to generate spend-based revenue.

I urge the city to immediately take action to regulate and tax home sharing businesses, before their share of the accommodation market becomes detrimental to the tourism industry.

Sincerely,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 4:46 PM  
**To:** Legislative Services email  
**Subject:** Airbnb

To whom it may concern,

I am a 74 year old widow and have some spare room in my house. My husband passed away year 2000 and we had just been given the down payment from our son to invest in a home. We moved in 21 Aug 2000 and my husband past away  
personal information I was left with a mortgage and bills. I have had foreign students and worked as a Insurance broker, still in that field. I have no pension other than a small CPP and OAS.

I would hopefully be able to retire in a few years with a supplemental income from my Airbnb.

Airbnb provides a great service and I have had wonderful guests that have been been able to stay here for \$74/night this season and a bit more in the summer, compared to the hotel rates \$125 - \$500/night.

Respectfully

personal information

Sent from my iPad

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 3:13 PM  
**To:** Legislative Services email  
**Subject:** AirBnB Feed back from a single parent

Hi, I received an email in regards to feedback about AirBnb. I am a long term employed single parent who owns my own home. Yet I have struggled severely for years to keep mine and my sons head above water, We have lived on the personal information and have done our best to grasp at straws to not have to go there. To the point of personal information

My personal information and with all he has learned through this super awesome group he has set his personal information, now keep in mind we cannot afford food, his body has trained itself to not need lunches, he eats breakfast and dinner only. Yes his school has contacted me to say hey personal information

Only this year we have discovered AirBnB and just as I am thinking holy crap finally here's a ticket out of poverty, if I can just get my head above water this year I can then put the income towards the personal information he will need. But then just as quickly as I see a way out the rug appears to be getting pulled out and I feel as though someone want to stand on my head to ensure I sink.

So I am not sure it will help but that's my feedback on AirBnB. Obviously I would like it to stay, I do understand putting restrictions on people who have multiples and don't reside in them but for families grasping to stay afloat and finally feeling a weight being lifted making them suffer seem cruel.

Thank you for your consideration,

personal information



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## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 8:53 PM  
**To:** Legislative Services email  
**Subject:** Airbnb

Any crack down on full unit STRs should come with a BAN on building new hotels. We need more affordable housing built, more micro-aps/"adult dorms".

Lets decentralize the profits and keep them in this city with "co-op hotel"/airbnb friendly buildings. I've heard a lot of personal stories and there are some very good reasons people have turned to STR.

Because of my own building's fearmongering about safety re people staying WITH me renting out the spare room when we are not using it... I've been trying to find a roommate instead but no one wants to pay the price of a room at one of these expensive downtown condos!! I might be forced to move.

I know you can't change condo by-laws, but you can certainly set a tone... as you have already differentiating between whole unit STR and renting out a room in primary residences. But to meet demands of tourists and house them all I would suggest you strongly encourage Strata to relax on STR, just deal with repeat offenders-case by case, and they can sign up with Airbnb's new service which give everyone access to guest lists, and whole-building insurance, since they are worried about such things! [or any similar service who wants to offer that peace of mind]



## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 1:07 PM  
**To:** Legislative Services email  
**Cc:** personal information  
**Subject:** Arbnb

Hello,

I am a longtime user of Arbnb worldwide and also know of friends who run Arbnbs. My rich experience using a Arbnb was much richer because I was able to integrate into the community, experienced local shops and businesses. But mostly I now can afford to travel and stay at these places because I am not paying for corporate accommodations.

This is list of many positives that Arbnbs bring to our community and I hope that my voice is heard in saying that if you apply restrictions to current Arbnbs you will suffocate the culture and local business Arbnb brings along with it.

1. Vistors around the world coming in local communities.
2. Investing in LOCAL communities rather than the corporate rich centre
3. Bringing in cultural diversity to local communities
4. Retired people being able to afford their homes because I can create income
5. For those people who have illegal suites that the city does not allow renters, this is a way for homeowners to afford their homes
6. Investing in LOCAL interactions rather than just the reguar tourist traps
7. It's LOCAL communities that are profiting rather than corporations
8. LOCALS are recommending their local businesses to go to rather that corporate businesses
9. This brings in more diversity, cultural experience and will attract more vistors to our beautiful city
10. A

Kind Regards,

H

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 12:21 PM  
**To:** Legislative Services email  
**Subject:** Argument in Favor of Condoshare @ Airbnb

I understand that some changes are being made for AirBnB in Victoria. As the host of a Condoshare (I live there and rent my spare room) I must say that Airbnb has massively improved my mental health and financial stability. It has permitted me to develop my career, improved my Social and <sup>personal information</sup> by freeing up time, and introduced me to contacts around the world.

The homeshare I believe is the original ideal of airbnb and restricting homeshares is short sighted. I understand how the system is being abused by large entities, please go after them. Not the individual who deserves the liberty to host travelers and make friends.

Sincerely  
personal information

Sent from my Huawei Mobile

## Rob Gordon

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**From:** Bonnie Hardy <strollers@shaw.ca>  
**Sent:** Wednesday, Nov 1, 2017 12:04 PM  
**To:** Legislative Services email  
**Subject:** City of Victoria Airbnb

TO City of Victoria, 1 Centennial Square, Victoria BC

In 1997 after **personal information** Government Street with

3 bed and breakfast rooms. I Registered the Name: **A Downtown Strollers** with the city and was one of the First to Advertise on the web with Internet Vacations. Home Computers were just becoming popular and folks from around the world began flooding to Bed and Breakfasts in Victoria BC. Because of our location (3 blocks south of the Empress Hotel) we referred guests to many other Bed and Breakfasts until they too joined the web. Victoria, BC Canada became the Canadian version of British Bed and Breakfast stays. Most B&B couples were 40 to 70 years of age.

In December of 2005, Tragedy struck when my first **personal information** .) We had tried to petition a ban on the MU2 in Canada.)

The following years After **personal information** I no longer advertised my B&B, but I kept my license because over the years my 3 Alberta guests had become Friends and they continued to book with A Downtown Strollers whenever travelling to Victoria.

Last Year, the deck off my kitchen had rotted, & had to be replaced. Having no income other than my **personal information** I registered with Airbnb to earn the \$4,500 cost to replace that deck. My **first personal information** guests arrived Easter week April 17<sup>th</sup> and the last guests departed August 27<sup>th</sup>. I had earned sufficient funds to have my deck rebuilt.

If not for Airbnb I would have a Locked door off my 2<sup>nd</sup> story kitchen with no deck.

While doing Bed and Breakfast my Annual Website fee was \$1,200. Airbnb does the Advertising and deducts a portion for their advertising expenses per client. Without Airbnb's assistance I would still have a second story door going nowhere.

In past years Victoria Hotels have complained about Bed and Breakfasts. But I feel Victoria has that Old World Charm **Because of Bed and Breakfasts!** In **personal information**

~ Home Stays were prevalent in Britain, France and Spain then. If Victoria hotels are not competitive in Booking Guests allow them to transition to apartment Blocks.

I believe there is room for all ranges of accommodation ~ airbnb is a blessing allowing the younger generation to travel to Victoria too.

Sincerely Bonnie Hardy Business Licence #9636

## Rob Gordon

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**From:** Alex Dagg <alex.dagg@airbnb.com>  
**Sent:** Thursday, Nov 2, 2017 1:38 PM  
**To:** Chris Coates; Lindsay Milburn; Shannon Jamison; Jonathan Tinney; Legislative Services email  
**Cc:** Patricia  
**Subject:** Committee of the Whole Report - Response from Airbnb

Good afternoon,

We are writing in response to the proposed short-term rental regulatory framework that Victoria City Council received on September 21, 2017.

Airbnb is pleased to see that Victoria is moving toward regulating home sharing and that the framework will legalize short-term rentals in all residential areas. We have reviewed the regulatory framework to change the *Zoning Regulation Bylaw* and we look forward to ongoing participation in this policy process and to continuing to share data and information about our community with city staff and council.

Airbnb is proud to represent a diverse community of hosts and guests who collectively make up our home sharing community. Airbnb connects people to unique travel experiences, in more than 65,000 cities and 191 countries.

Keeping our community safe, both online and offline, is one of the most important things we do. There have been more than 200 million guest arrivals in Airbnb listings to date, and negative incidents are extremely rare.

Even so, we're constantly working to improve our platform, our policies, and our protections, because even one incident is one too many. In fact, our Trust and Safety department has offices spanning the globe in San Francisco, Portland, Dublin, and Singapore. Our team is made up of engineers, 24/7 response agents, data scientists, product managers, designers, law-enforcement liaisons, crisis managers, and victim-advocacy specialists, in addition to policy, privacy, cybersecurity, insurance, and fraud experts—all working together to keep our community safe.

Hosting on Airbnb in Victoria helps everyday people afford to stay in their homes. As of September 1, 2017, the typical Victoria host shared space in their home for 56 nights per year and earned an annual income of \$9,400 on the platform, or about \$780/month. In the past 12 months, there have been 78,500 guest arrivals to Victoria on our platform, with an average length of stay of 3 days. The top five origin cities for Airbnb guests visiting Victoria are the neighbouring cities of Vancouver, Seattle, Calgary, and Victoria and Toronto.

Airbnb is transforming travel by allowing people to experience cities like a local, visit family members who may live in Victoria, and support neighbourhood businesses that would never see tourists otherwise. The Airbnb host community also supplements the available hotel stock during peak travel seasons and generate additional tourism revenue. This is particularly important in Victoria, since [tourists face a tight market for hotel rooms](#) (Times Colonist, January 2017). Paul Nurse, the chief executive of Tourism Victoria, noted earlier this year that the hotel occupancy rate was affected by reduced hotel room supply and the room rate was affected by inflation, contributing to a record year for tourism to Victoria ([Times Colonist, February 2017](#)).

At this time, we are somewhat discouraged by the Victoria council's indicated approach. There is a perceived inequity in that the new business license for primary-residence STR hosts is two times that of a traditional

business license in Victoria (\$200 versus \$100). With respect to business licenses, we support a simple, online process with a modest fee, that is commensurate with the typically casual nature of home sharing.

We are also concerned about the effects of excluding secondary suites from the framework. Families are diverse and change over time, as do their needs for the extra space in their homes, including secondary suites. We have hosts who use secondary suites to rent to university students only during semester months. We also have hosts who keep basement suites for the use of aging parents and adult children when they visit. As currently proposed, the bylaw would unfairly restrict the rights of Victoria residents based on a mistaken assumption these units would go into the permanent long-term rental market.

A positive component of this proposal is the ability of both renters and owners to home share. It is important that renters are able to participate in home sharing, so that they too have the ability to earn meaningful, supplemental income needed to pay the bills and afford to keep living in Victoria. However, the bylaw currently places additional burdens on renters to obtain a letter of permission, and unnecessarily inserts the city between tenants and landlords. In an intensely competitive rental market, the current draft will only chill the ability of renters to home share and place them at a further disadvantage compared to Victoria residents who own their homes.

We ask the City of Victoria to continue working collaboratively with platforms like Airbnb to design a more appropriate and straightforward regulatory system. We want to work with you to ensure the rules are fair and easy to comply with for all Victoria residents.

Sincerely,

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Alex Dagg  
Public Policy  
Canada

[\(416\) 573-8193](tel:4165738193)

[#WeAccept](https://twitter.com/WeAccept)

## Rob Gordon

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**From:** City Life Suites <stay.citylifesuites@gmail.com>  
**Sent:** Thursday, Nov 2, 2017 4:05 PM  
**To:** Legislative Services email  
**Subject:** Direct Opposition to Proposed Changes / Short Term Rentals Victoria

To whom it may concern,

**We are writing this letter today to express our direct opposition to the proposed changes for short term rentals in Victoria. We strongly urge council not to proceed with the proposed new business regulations.**

Our background is as follows; we own a small local family owned short term rental agency in Victoria. We purchased this 11 year old existing business in February 2015, and relocated to Victoria from southern Saskatchewan. This agency is our only source of income. We work tirelessly to maintain a reputable agency and with the proposed new business regulations regarding short term rentals in Victoria, if passed, will have detrimental effects for our business.

We are a hands on agency and currently manage 15 properties in downtown Victoria. All of our properties are located in transient zoned buildings, all of our owners are required to purchase City of Victoria business licences annually, and we abide by the rental bylaws of our strata lots. According to documents presented on the City's website, we have legal non-conforming status with all of our properties. However, even though we have done everything required, we are extremely concerned that if council proceeds with the proposed rate fee increase of \$2500.00, our owners will sell, and we will be left with no business at all. You may think this is an exaggeration, but believe me, it is not. We feel councillors have put our business future in jeopardy. As small business owners, we work very hard to maintain a good reputation, a strong customer base, and a trustworthy environment. Mayor and councillors, you are putting our future at risk. In addition, we collect MRDT, PST & GST on all short term rental reservations and remit quarterly.

We wonder why council did not consider enforcing the non-compliant short term operators who a.) were operating in non-transient zoned areas of the city and b.) were operating without a licence? This approach would have been an acceptable starting point to cleanse the short term rental market, instead of "bringing down the hammer" on all short term rentals, lumping us into one large group even though we operate very differently.

We also wonder how the city enforced short term rental owners / operators to purchase business licences. After many conversations at the "open house" October 30th, we determined most were operating without business licenses. What enforcement was used to implement operators to purchase business licences? It does not seem like a very difficult task. All listings are available to the public on vacation rental platforms, contacting hosts is easy. Why was this not implemented before extreme action was taken? Or does council want to eliminate short term rentals completely?

Lastly, the city claims to be making these changes to short term rentals because of the concern for availability of housing for residents of Victoria. Would it not make more sense to enforce the short term rentals in **non** transient zoned areas of Victoria, introducing large sectors of availability for residential housing. In addition, enforce those owners who are currently operating short term rentals in transient zoned buildings/areas, to acquire a 2017 business licence by the end of this year. If owners do not comply at that time, they may then face a penalty. Council's proposal is penalizing all short term vacation rentals owners, even those who comply to all requirements (licence, transient zoned, strata bylaws). Lack of affordable housing is a very complex problem in most cities across the country. In our opinion, council's approach on proposing the new regulations will not solve this problem.

We hope mayor and councillors hear our appeal. Do not proceed with the proposed new business regulations. Do not implement the \$2500.00 licensing fee.

Sincerely,  
Rod Carroll and Melissa Frank



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City Life Suites Ltd.  
Self-Catering Vacation Rentals in Downtown Victoria BC

[Trip Advisor/FlipKey's Top Vacation Rental Victoria, BC 2011, 2012, 2013, 2014, 2015](#)  
<http://www.citylifesuites.com>

<http://www.citylifesuites.co.uk/>  
E-mail [stay@citylifesuites.com](mailto:stay@citylifesuites.com)  
Phone 250-360-0774 Pacific Time  
[Follow Us On FaceBook](#)



## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 7:00 PM  
**To:** Legislative Services email; Lisa Helps (Mayor); Community Planning email inquiries; Victoria Mayor and Council; Business Licence; Public Hearings; Ben Isitt (Councillor)  
**Subject:** feedback regarding their proposed regulations on short-term rentals.  
**Attachments:** Marcia Freeman letter to city.docx

I am writing with feedback for the city's proposed regulations on short term rentals. Here are some of the points I would like to make:

Short term rentals are an affordable option for visitors to stay in the city of Victoria. I have had over 100 guests stay at my STR this year for an average stay of 3 nights, these people prefer to stay in a place they can call their own whilst they stay in the city. Some who needed to stay longer even checked out of hotels as they prefer being in a unit since it is more friendly and is more like being at home.

These people spend their money in the communities and visit the tourist attractions.

I bought my condo as an investment for what I call will be my old age home. I do not have a pension and the condo is too small for me to currently live in. I have experienced long term renters who have been much more of a problem, they have wrecked brand new carpets and painted walls and even broken an oven which wasn't very old. It had to be replaced. Because of this I switched to STR and visitors treat the place with respect and abide by the house rules they are given.

I have a business license which cost \$115.00 Jan 2017, to increase the cost of a new license to a rate of \$2500.00 would be absurd. STR's are small businesses (1 small unit) and we should not be penalized or have to pay a license fee at an



increase of 2200% . We bought units which were allowed transient rentals and we should not be punished.

STRs are worldwide and nowadays people expect to be able to stay at them whenever and wherever they go. People visiting Victoria will expect to be able to choose to stay at an STR or a hotel or hostel, people like choices and do not want to be told they can't choose what they would like to do.

I would like to travel in my own country more often, I would like to visit Vancouver more often but the affordability of staying in a hotel in Vancouver makes it unaffordable.... it is cheaper to go to the USA for a weekend than it is to go to Vancouver, that is sad as I want to support my country not the USA. If STR's were more available I would be able to go to Vancouver more frequently rather than maybe once a year.

With the new buildings that are going up in the city that are for rentals only <https://victoria.citifed.ca/rentals/>

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Victoria, BC New-Build Rental Listings | Citified Victoria ...

victoria.citifed.ca

Citified Victoria's rentals list is the only comprehensive database of new-build rental apartments and townhomes throughout metropolitan Victoria, Canada.

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These will provide a total of 644 units in the downtown core alone. There is no lack of places to rent in the city for long term renters.

If STR's are prevented or made hard to conduct legally then people will not invest in the numerous buildings currently being constructed in the city. This will cause job loss and will eventually lead to recession. Victoria is a booming city lets keep it that way.

The STR industry has created many jobs – this has also brought money to the city of Victoria and people have more money to spend here in the communities.

I ask the city to gather Data, do a study over the next 2 years to gather your facts. Read the stories from people who use STRs to stay in.

Please do not rush into making decisions about this industry when it is so apparent that the city does not have facts and when they have the facts they will then see what a benefit they are to our great city!

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 5:53 PM  
**To:** Legislative Services email  
**Subject:** Input on Home Sharing Legislation

Dear Sir/Madam -

My husband and I have been Airbnb hosts in the Langford area for the past four years.

It has been both an incredibly interesting and a financially helpful experience.

We have met and hosted people from many parts of the world - visiting as tourists - and we have also hosted guests who are visiting family in the area (e.g. at holiday times).

Royal Roads students often stay here during their residency periods.

Our suite is a part of our home - on the ground level and is self-contained. It was professionally renovated and is bright and clean and well-equipped.

While it is all of these things, I suspect it would be too small for anyone to rent long term.

We are also reluctant to rent long term as we want to have the flexibility to use our suite for our own visiting family and friends.

Having an Airbnb suite allows us to do that (as we simply block off the dates we need for ourselves).

The income (\$12-15,000 annually) allows us to cover most of the maintenance costs for our home.

We pay federal and provincial taxes on that income and would not object to paying for a business license, if the City of Langford required us to do so.

Home sharing has been a wonderful way to connect with people from other parts of our country and the world. We've had a chance to share a bit about our culture, and as well to learn about our guests' home countries. (Some times we have lots of contact - other times very minimal). It can make the world feel a little friendlier, frankly. And, the income allows us to stay in our own home, as we move into retirement.

Thank you for taking the time to read these comments.

personal information

Victoria, BC

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:31 AM  
**To:** Legislative Services email  
**Subject:** Letter regarding Short Term Rentals  
**Attachments:** City\_of\_Victoria\_letter\_in\_pdf.pdf

Good morning,

I am responding to the call for letters regarding our opinion regarding the City of Victoria's upcoming meeting Nov 18th regarding Short Term Rentals. Please find our letter attached. Thank you.

Paige

personal information

November 1, 2017

Legislative Services Department  
c/o City of Victoria

To whom it may concern:

We have been looking to purchase a condo in Victoria for the last 3 months. We are aware of the challenges Victoria faces surrounding Short Term Rental's and have been to the City recently to clarify what our position would be when we find the right unit to purchase. We currently live full time in Kelowna, BC and our city too has struggles with STR's, high rents, and low vacancy rates. In fact many larger cities have their own set of circumstances with the common problem of lack of affordable long term housing.

Our goal, as we near full retirement, is to be able to subsidize our mortgage with short term rentals when we are not staying in Victoria. Our numbers show that we would be renting it out approximately 60-70% of the time with the balance as personal use with the rentals declining over the years as we prepare for full retirement. Your goal of providing long term rentals would not be met with us as we would not rent our condo out at all if STR's were not allowed.

To make STR's onerous or prohibited is unfair on various levels.

- The proposed \$2,500 /year business license fee is extreme. For us it would trigger a situation where we wouldn't rent it at all.
- To disallow them altogether would again trigger a "no rent" policy for us
- To allow them only in single family homes would take away the opportunity for us as investors to purchase in Victoria and be able to enjoy our property when we choose.
- To charge STR's property tax at a 100% Commercial Rate is unfair. We agree that STR's should contribute to the City's coffers on the marketing done to attract tourism dollars. However there needs to be a sliding scale of some sort so that those that use them personally, as many do, are not lumped in with those that rent them out full time.

Not having STR's also will take away visitor dollars as many folks won't be able to afford to visit as the hotel rates in downtown Victoria are extremely high. In our exploring of Victoria as a potential investment recently, we stayed at both a hotel and an Airbnb. The Airbnb was half the hotel cost and absolutely comparable. Both experiences were excellent.

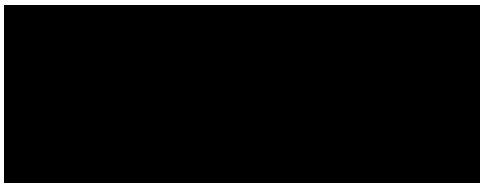
We live in a democratic society where everyone has opportunity. Home sharing or STR's is important to us to allow us to purchase a second home in Victoria, to

provide affordable and alternate accommodation to visitors who are budget conscious, and to help bring in more visitors to Victoria.

To disallow STR's to investors who have worked hard and invested carefully all their lives in order to retire and enjoy life as they see fit seems very backward indeed. We own rental properties in Kelowna and have seen many different types of tenants over the years. On many occasions, we have subsidized our tenants when we felt they were in difficult situations and needed a hand up thereby giving back to our community. We don't believe that we should have to subsidize people just for the sake of it. If the rent is too high or there are too few rentals available in the downtown core, then folks will have to look elsewhere, just like we did.

Many cities have had issues surrounding STR's and many have come up with great solutions. We ask that the City of Victoria hear what a growing number of people are saying and find a solution that works for everyone, not just the few.

Sincerely,



## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 12:18 PM  
**To:** MAH.Minister@gov.bc.ca; SDPR.Minister@gov.bc.ca; TAC.Minister@gov.bc.ca; FIN.Minister@gov.bc.ca; Premier@gov.bc.ca; MCF.Minister@gov.bc.ca  
**Cc:** AG.Minister@gov.bc.ca; MCF.Minister@gov.bc.ca; CC.Minister@gov.bc.ca; Victoria Mayor and Council; EDUC.Minister@gov.bc.ca; CITZ.Minister@gov.bc.ca; carole.james.mla@leg.bc.ca; Marianne Alto (Councillor); Legislative Services email  
**Subject:** Fixed leases and good landlording

Dear Premier Horgan and Ministers:

I have included you in this communication because I believe that while some have a direct relationship to the issue at hand, there are likely unrealized connection to your portfolios arising from a more nuanced appreciation of the matter exemplified in the landlord-tenant communication that is forwarded below.

Kindly do me the courtesy of reading through as I hope it may inform a broader understanding of the interdependencies among issues currently seen and addressed as separate matters. And, I hope you will support my request for an alternative means to achieve the stated goal of ending fixed term lease abuses in a way that does not worsen certain situations.

Disclaimer: I am the landlord in this communication. I have redacted all identifying information of my tenant to respect privacy. Kindly respect that as well.

My personal situation is that I am a “small owner” who must hang onto property for my fast approaching old age. It will be my pension if and when I can pay down mortgages sufficiently. At the moment, though revenue is taxed as if in hand, in fact revenue goes to operations and the mortgage and my partner (past retirement age) and I struggle to earn money to pay tax so as to retain the property for the future. I use 2 short term rentals to offset rising costs so that long term tenants do not experience an annual rent increase (none in 2-5 years for two seniors on fixed incomes and three young families-a total of 13 people, babes to octogenarians).

Re fixed term leases: we use these religiously and do not raise rents annually or above the government set rate in a given year.

The fixed term lease provides an incentive to tenants who might otherwise make life uncomfortable for their in-building and next door neighbours (as has happened). In such as case, uncomfortable co-existence carries on forever, or an unpleasant and protracted eviction process must be pursued.

A fixed lease scenario permits mutual agreement three months before lease end (in our practice) and a new lease at the same rent or, when we must, as the government set rate for the year. By its very nature, it provides a natural coming together of landlord and tenant with opportunity to learn if anything needs attention, something many tenants are reluctant to do independently.

**Government does not have to end fixed leasing to achieve the goal of fair treatment of tenants.**

Our practice protects both tenants and landlords. A simple and effective alternative to ending fixed term leases would be to:

**Establish in law that if the current tenant is offered a new consecutive lease, any increase in rent must be identical to that government sets for month-to-month leases.**

Please focus on the outcome (a stop to abuses of the fixed lease) and implement the alternative approach described above.

I would be pleased to answer any questions that may arise or to discuss these matters if that would be helpful. Thanks for your attention to a constituent landlord who voted for your government. Please don't let me down.

Sincerely,

personal information

Begin forwarded message:

**From:** <redacted>

**Subject:** Re: Short term rentals

**Date:** November 3, 2017 at 8:17:23 AM PDT

**To:** personal information

Thanks John, I value all of your comments indeed.

<redacted>

On Nov 3, 2017 8:10 AM, personal information wrote:

Hi <redacted>

Quick note to acknowledge you[r] message to Council. Thx.

Pls. do know that when rents increase, we always do so using the amount government sets for month to month rentals. Our use of the fixed lease has been consistent because some tenants need that incentive to respect the tenant community they are part of. It is the only mechanism a landlord has other than an eviction process that is so hurtful to all. Unfortunately, the fixed term lease is going to disappear and then if a tenant causes difficulty for you or others, there will be little we can do about it.

It is true that it's a problem for us in that we fall behind every year, but we also truly value our little community and do everything we can to keep you and others with us.

Thanks again for supporting the STR concept. Easily 65% of our STR tenants have been Islanders and people on medical treatment at RJH, or families (from 7-8 countries) placing kids at school, university or for language study, profs and others on short term academic or work projects. Hotels cannot meet their needs without hardship. The remainder are people who, like us, specifically go to places where living like a local is an alternative to a hotel in a tourist zone. They shop locally supporting neighbourhood small businesses and would be lost to Victoria without STR.

I am arguing that Council actually study the issue and learn about the economic benefits and social well being that STR contributes—all while allowing us to support our long term tenants and provide accommodation for family that, previously, we could not welcome for gatherings (we don't have the necessary guest space).



Public policy should be made on a foundation of knowledge, not the kind of stuff the hotel industry has been saying, so we really appreciate your support.

Kind regards,  
personal information

On <redacted> wrote:

Honourable Mayor and Council Members:

With respect to the ongoing challenge of housing and rental shortages in Victoria, I am writing on behalf of both my landlords and myself.

I am a Senior with fixed pension income. I live in the Oaklands community as a long term renter, in a suite with a fixed term Rental Agreement. While I wouldn't say my rent is cheap, it is doable, but only if it doesn't increase.

To date, my landlords have not raised my rent in three years, because income from their short term rentals has been such, that it wasn't deemed necessary.

On the other hand, I am an ideal, responsible tenant who is quiet, timely with rent, aware of increasing costs, so I keep utilities at a conservative use, and maintain my suite as if it were my own home, giving added value back to my landlords.

So I speak for both - for my landlords, that they may continue to maintain their short term rentals. And for myself, I am appealing to City government to do away with fixed term rental contracts.

I live in constant concern, knowing that when my current rental Agreement is up, my rent could be raised to any amount my landlord desires, which could exceed the current allowable percentage increase on regular Rental Agreements. If mine were raised more than the allowable amount, I would need to move out of Victoria, to seek affordable housing elsewhere. This would cause unlimited stress, not only due to

personal information

my doctor, community

events involvement and much more.

With respect to all parties, it is my earnest hope that mutually beneficial solutions can be reached for the peace of mind of all who are affected.

Thank you.

<redacted>

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 9:50 AM  
**To:** Legislative Services email  
**Subject:** Hello to the City of Victoria,.pdf  
**Attachments:** Hello to the City of Victoria,.pdf

All the best, personal information  
Cell:

# Hello to the City of Victoria,

I understand you have made the decision to change zoning and the rules on Short Term Rentals in the City of Victoria.

As a business owner and resident I am uncertain of the true reasons for this. I do understand that you are having a housing issue but have other solutions been looked at as well? This issue of the housing appears to be more complex than just the Short Term Rentals.

The Short Term Rental market appears to bring upwards of over \$50 million dollars of tourism to the City of Victoria each year. The hotels are sometimes fully booked, or have an occupancy rate of over 90%. Tourists are looking for other means due to this. As well tourists often are looking for accommodations where they may have some additional room, a kitchen to cook or have the option to eat out. Additionally some tourists are not able to afford the costs for booking with hotels and are looking for more affordable accommodations. I wonder if the Short Term Rental market was taken completely away from the City of Victoria what the impact would be on tourism and then the after affects of where they spend their monies. Are you able to show to me a longitudinal study outlining the affects of this? Have you analyzed the data on this?

Many cities, one in particular, Toronto, welcomes the Short Term Rental market to its community.

With respect to being a home owner, we should be able to make our own choices on how we want to make use of our properties. With the Short Term Rental Market zoning being changed the City of Victoria is not allowing individuals to make their own choices on their properties.

Should instead you leave the zoning and do as you have institute the business license fees and possibly other items to ensure that all parties are maintaining their properties?

I hope the City of Victoria takes into consideration all the outlying factors with the Short Term Rental market.

Sincerely,

[REDACTED]

A concerned citizen

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 5:40 PM  
**To:** Legislative Services email  
**Subject:** Home sharing.

I work out of town and I live alone and pay taxes and am proud of my city Victoria. I do Airbnb home sharing to help with the bills and only do that when I am away a few days a month. Before I moved to Victoria, I used to come to here lots and at so many occasions I could find accommodation as the whole city was full especially summer time. Then I decided to have my own and contribute to the city I love. Unfortunately, some people are not happy with the situation and want to regulate this situation. Not only speaking for myself. Life is hard in this town especially in winter time when business is down. All home owners are trying to do is help pay the bills which are high because of the same regulations that are in place. People are having a hard time making a living. Airbnb is a way to help low income people with houses supplement life with a little bit of cash for bills and groceries while living in the city they love and call home. The people proposing the regulations are in no need for a bit of. Change to help pay for food as they are well established. And most have special interests trying to leave all the rental market to hotels and they get paid by those managers for personal gain.

I have one question, give a list of 20 problems that Airbnb rentals and home sharing have done to the city besides being in more tourist and families who can't afford hotels to live in the city?

Almost none, because they are under the care of the home owner. Maybe the regulations should focus more on the homeless and the drug addicts who are using services like ambulance all the time when overdose happens and costing us taxpayers money which we pay and contribute to the city while the people you are turning a blind eye on are the problem and sucking the hell out of the economy day and night by having fire fighters and nurses busy and yet they are not contributing anything to the society!

There are over 30 new buildings being constructed in Victoria, no specific statistical data but I heard only 5% will be for rentals. So if you want to regulate something to make more housing for people in the city, maybe look at those new big buildings coming up as it is gonna be hard to go and tell someone who owns and pay tax what to do with his or her house, not even you would like that!

Don't destroy creativity if it's helping people and the economy because one day so and yet you do nothing about the homeless and drug addiction people sucking the system day and night!

Be productive for once and do the right thing. Old Canadians who have paid for the retirement and benefits all their lives can barely get an ambulance on time because they are busy with addicts who are just sucking the system.

That's a broken world you need to fix.

Don't start fixing house sharing that's not broken!!

And I hope you do the right thing.

personal information

Sent from my iPhone

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:23 AM  
**To:** Legislative Services email  
**Subject:** Home Sharing

Hello,

I am a part-time Victoria resident and part-time AirBnB host. My suite is in a building (The Palladian) currently designated transient for short-term stays, and I am hoping it stays that way.

Since I live in 2 different cities (and pay taxes in both) I think my situation is perhaps unique, but it is quite important to me that I recover my mortgage expenses for the 50% of the time when I'm not in my suite.

I also understand the concerns of both hoteliers and people trying to find long-term rentals in Victoria. As an AirBnB host, I would be willing to pay some sort of "hospitality" charge so that I am not just merely profiting unfairly. I would expect the fee to be reasonable.

AirBnB is not likely to go away. I have heard of many owners in buildings that are clearly designated "non-rental" listing their places on the site in defiance of their strata regulations and even AirBnB rules. I am also aware of owners who do not reside in Victoria and have no intention of doing so simply "scooping" up properties to run solely as AirBnB businesses. I am quite comfortable with cracking down on both of these kinds of owners.

Thanks,  
personal information  
Victoria/Calgary

**Rob Gordon**

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:09 AM  
**To:** Legislative Services email  
**Subject:** Home Sharing

As a retiree on a reduced, and fixed income, my wife and I wish to remain in our family home, but also want to enjoy travel. Home sharing allows us to do both. Rather than let our home sit “empty”, or pay someone to “house sit”, we find home sharing to be an excellent solution to maintain our quality of life and enjoy our retirement years.

This is our primary residence. We did not purchase this residence to generate income, but rather to live in for 90% of the year. We do not live in the downtown core, but in a residential neighbourhood. We offer accommodation that is not available in hotels.

It makes no sense to restrict home sharing for people like us.

Thank you.

**Rob Gordon**

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**From:** Laurie Ingalls <info@ultimatebnb.com>  
**Sent:** Thursday, Nov 2, 2017 10:29 PM  
**To:** Legislative Services email  
**Cc:** hello@airbnbmail.com  
**Subject:** Home Sharing and Short Term Rental

Dear Sir/Madam,

As you consider the issues surrounding the question of home-sharing and short-term rentals in the City of Victoria we would like to add our voice to the discussion.

Full Disclosure: In the past, the City of Victoria has recognized us on more than one occasion with their prestigious annual hospitality award as retail tenants in the Victoria Conference Centre. Presently we operate a 5-Star, fully licensed B & B in Greater Victoria that is located in our principal residence. So while we are not currently within the jurisdiction of the City of Victoria per se, we offer a credible point of view. In this writing we would like to present a number of important points not often discussed in the press coverage of this issue.

Our short-term rental accommodation, like so many others in Greater Victoria, offers a unique, highly valued guest experience. We have been told on more than one occasion our guests would not have visited Victoria had these options been unavailable. We offer a high-end vacation experience that includes quiet privacy with five-star amenities; a fully stocked and equipped chef's kitchen, hot-tub, private garden and access to our seasonal productive vegetable garden. Many of our guests have special dietary needs. The ability to cater to those needs is paramount in their decision to visit Greater Victoria over other options they may have.

These accommodations are not 'affordable housing'! They were never meant to be so. The high quality short-term rental offered by us and so many colleagues are often mistakenly represented as such. The point so often missed is that many of us in the home-sharing/short-term rental segment offer a product not currently on offer at local Inns and Hotels. There simply is no conflict. We offer a markedly different product and overall vacation experience. We are attracting an affluent and active clientele that contributes significantly to the local economy. But they don't want the 'executive' hotel accommodation while on holidays. That is something they experience while working. Our client seeks the quiet and privacy of a suburban residence. They seek some interaction with the 'locals'. The European wants a connection with Canada and with Canadians. More importantly, after having enjoyed a unique social experience getting to know 'real Canadians', these travelers are spreading the word amongst friends and colleagues back home.

Home-Sharing and Short-Term Rentals offer a unique and widely sought after vacation experience. If the decision is made to remove this option here in Victoria, travelers will



simply go elsewhere. The notion that this sector negatively impacts the affordable housing market is simply false. We, and many other property owners we have spoken with agree that our rental properties would be empty and sold if the short-term rental option is removed. Many of the folks who offer short-term rental are quiet, dedicated ambassadors for this area. The 5-Star rating system is a valuable industry standard that fosters very high standards. Hosts and owners strive to attain, preserve, and protect their coveted ranking with the end result that everyone in this area benefits from our burgeoning tourist industry.

Many participants in the short-term rental sector are retired or semi-retired and supplement their pensions and income by home-sharing. The side-benefits are enormous. They create purpose, physical activity, creative thought, entrepreneurial spirit and dedication that keeps them in their homes and off the health-care system. Later on that same secondary accommodation can house care-givers, keeping folks out of our expensive health-care institutions helping to relieve pressures on our already struggling health-care system..

These are but a few examples of the ways in which home-sharing and the short-term rental movement make palpable and marked contributions, not just to the region but to our social fabric. The narrow focus on just 'affordable housing' that so often monopolizes this conversation can often miss "the forest for the trees".

At the same time we (and others that we know) understand and concur with the notion of creating a level playing field. We're all for reasonable and responsible regulations and fair taxation. Let's start the conversation, take some time to get this right and create a win-win for all sides.

Thank-you for your time. We appreciate the opportunity to add to the discussion.

Warm regards,

Laurie Ingalls/Faye Wardrop

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UltimateBnB...could it be your 'ultimate getaway'?

**Rob Gordon**

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:52 AM  
**To:** Legislative Services email  
**Subject:** Home Sharing Feedback

City of Victoria,

Thank you for taking feedback regarding this important issue. My family has a legal suite in our home that we rent out for short and long term stays. While every situation is different, we believe there are many benefits for our family and area by having this unit.

As a stay at home mom, I manage the unit, including correspondence, finances, cleaning, and maintenance. It gives me a way to financially contribute to our family and show our children my skills and work ethic in a 'job'. Greater Victoria is an expensive place to live and our suite provides valuable income. And as with many, we have friends and family who live far away. By having a space that is not occupied full time, it means we have somewhere for our family to stay.

We host guests from around the world for stays of 3 days to 6 months and interact with them frequently, offering travel help and tips on the area and local businesses to enjoy. We live at the Vic West/Esquimalt border and bring tourists to an area outside of downtown and encourage them to visit businesses that tourists would normally miss. Our service is something that families appreciate and may not find in traditional accommodations that they can afford.

Lastly, having guests from many different places is wonderful for our children. They get to meet people from all walks of life and learn about different cultures. We develop relationships with our guests and have invitations to many places around the world. This is also a relationship that many travellers are looking for, that they cannot get in traditional accommodations. It also teaches our children to be conscientious and respectful to others in their everyday lives. It also means they need to be conscious of their noise level, which we really appreciate ☺.

There are so many benefits for our family to have the flexibility of short term rentals and we feel that we do it in a responsible and respectful way. Our suite is legal and safe, there is ample parking available on our street and we are bringing travelers to other parts of the area.

Thank you for considering our feedback as you develop legislation regarding home sharing and short term rentals.

Sincerely,  
personal information

Sent from my iPhone

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 1:09 PM  
**To:** Legislative Services email  
**Subject:** Home sharing legislation

To Whom It May Concern,

I have a house in James Bay which has been extensively renovated into a luxury furnished suite. I use it part time when I'm downtown, and the remainder of the time it is rented short term via online sites. It is fully booked through the summer months with European families who are not interested in a hotel, but prefer a home environment with kitchen and laundry. In the past, I have rented suites and homes long term. I can tell you that should you legislate against me using my property for short term rentals, I would NEVER return to renting it as a residence to locals because of the terrible experiences with property abuse and damage. The RTA in BC is ridiculously in favour of the renter and Victoria is riddled with spoiled, entitled, disrespectful tenants who are not held responsible for their behaviour and actions. If you were to tour my furnished property you would quickly understand that disallowing it on short term rentals would only hurt the local tourism economy and would in no way aid in low income housing.

Low income housing doesn't belong in the downtown core of capital city which has an economy largely based on tourism. The demand for such housing is a reflection of the failure of the greater Victoria municipalities to amalgamate and provide effect rapid transit to lower cost neighbouring communities. This short-sightedness is really starting to cost Victoria dearly, as our reputation as a clean, safe city is in decline.

Sincerely,  
personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Saturday, Nov 4, 2017 2:54 PM  
**To:** Legislative Services email  
**Subject:** home sharing through Airbnb

Good morning,

My husband and I live in Langford. A few years ago we opened our house to home sharing through Airbnb and it has been a rewarding experience for us. First of all its allowed us to meet people from all over the world and to show them the charms of our beautiful little city of Victoria. Its has also allowed us to make our house available to others when we are out of town.

The main benefit to our **visitors** is the comfort of staying in a real home that is fully furnished and private, well supplied with cooking facilities and a large array of appliances, reading material, linens, toys for children, and a quiet neighbourhood where they feel safe and comfortable.

The main benefit of Airbnb to our **community** is that that most of the people who visit our house would not be able to come at all if this kind of accommodation wasn't available. They are mostly families, often with children or senior parents, and they need multiple bedrooms to accommodate everyone - staying in a hotel would be prohibitively expensive. Also many visitors are here to cheer on a family member in a sports event, or to attend a family wedding - again something they might not be able to do if they had no option other than a hotel.

Except for the loss of business that might occur to the hotel/motel industry, Airbnb supplies many other benefits to the tourism industry These are people who are eating out in restaurants, taking tours, visiting gardens, whale watching, visiting the museums and IMAX, and discovering all the wonderful natural parks in the area. Many of our visitors have rebooked again for next year, and will bring new friends and family to show them the wonders of Victoria.

We report all our Airbnb earnings and pay taxes on the income. We also hire a local woman to help manage the business end, which keeps her employed through the slow summer months. So besides paying more taxes we are also assisting local employment.

I would urge the city authorities not to cater to the narrow concerns of the hotel/motel industry in making home sharing too regulated or difficult, but to take a larger view and see the expanded benefits to our whole community to the potential that Airbnb and other organizations provide.

Regards,

personal information

Victoria

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 12:33 PM  
**To:** Legislative Services email  
**Subject:** Home Sharing

Good day:

I would like to express my desire to continue to be able to utilize the 2 bedroom in our house for home sharing. My wife and I are retired and we used the Airbnb program to be able to offer our empty rooms on a short term basis to out of town guests. It was our experience that the people staying with us were only in Victoria because of the affordability of our home. If they had to rent hotel rooms at a far greater cost they would not have visited. When in Victoria however, they did spend money at restaurants, buses, bars and events. Some came for courses and some just needed a place to put their head down as they passed through.

My wife and I our retired, we made enough in revenue to cover our yearly strata cost, that is all. We enjoyed the company and I think represented our community in a positive light. By our reviews we did our job and more...

Our own experience visiting Vancouver, in order to take my wife personal information , made clear as to why people were staying with us. We stayed at a medium hotel on West Broad St and had to pay \$250.00 plus tax for a regular hotel room, and that was with the medical discount. The regular rate was \$350.00 per night plus tax making it a \$400.00 stay. we now understand why people liked our home, and it gives them more to spend in the community.

Please don't take away our ability to be ambassadors for the community.

Thank you,

personal information

Victoria BC

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 3:12 PM  
**To:** Legislative Services email  
**Subject:** Proposed short-term rental regulation

Dear Council,

Thank you for the opportunity to hear from the public before finalizing the proposed regulations. I am writing as a long-term resident of Victoria and a person directly affected by the proposed regulations.

I have been providing short-stays (minimum 4 days) in my home for a number of years now. I have been doing it through Airbnb as I find it a flexible, affordable and helpful service which I also use as a guest when I travel. I report all of my Airbnb income on my annual tax declaration and pay the associated provincial and federal taxes.

If the proposed regulations go ahead as written I will have to stop providing short-term stays. My guests and I share my house but they have their own kitchen and living space. This places me outside of the proposed rules.

I started doing this shortly after I lost my husband and found myself living in our family home on my own. This meant living in a space that was too big for just me and too expensive for just one income. I considered selling but this is our family home and when my

personal information lost their father, they needed and deserved to have the stability of knowing we still had our family home and all of the memories it represents.

I made the modest changes that were required to create a physical division between two autonomous living spaces. I chose to do short-term rentals rather than having a long-term renter for two reasons:

The first and most important was because I wanted to be able to control my calendar for when the space would be available to rent.

This allows me to block off periods in the calendar personal information and out-of-town family and friends come to visit so that I can accomodate them. (My living space is just one bedroom.)

The second reason is because I liked the idea of meeting different people and sharing my space with families who were seeking a home-away-from-home travel experience. I have not been disappointed, and neither have my guests.

People who come stay for between 4 and 10 days, on average. They are either older couples who come to Victoria usually to attend their son or daughter's university graduation, or alternatively, to settle them into university. One family recently came to celebrate their father's 100th birthday. He lives here in a care home and family from various places around the world all came to celebrate. I have also had several young families with a new baby who saved up to be able to have a little holiday away from their home up-island or from the States. They wanted a place that would tolerate a baby crying at night (I do) and where they could also bring their family dog. These are just a few examples. Everyone who comes falls in love with Victoria and loves being here in a neighbourhood rather than downtown. They shop for their groceries and supplies at the nearby neighbourhood mall and eat at neighbourhood restaurants. In the summer months, they love the Moss Street market for its organic products and local crafts.

I understand and support Council's desire to increase rental stock for people looking for long-term rental accomodation. I agree with the proposed approach to bring accountability to the downtown condominium developers and owners who do not see their place as their home, but rather a way to make money through hotel-type renting. However, impact of

the proposed regulations goes beyond this target group to include people like me, a homeowner, long-term resident and person who accommodates people in my own home. If I have to stop doing short-term rentals, I will. I don't know what that will do to help Council achieve their objective of increasing rental stock, as I will not rent out the space on a permanent long-term basis. As I noted above, I chose to do short-term rentals because it allows me to block off my calendar to be able to accommodate family and friends in my home. And I believe that shutting off options such as mine to people who travel to Victoria actually works against the interests of Council's efforts to build strong neighbourhoods and to encourage sustainable tourism.

I hope you will consider this perspective in your deliberations.

Sincerely,

personal information

Victoria, BC

personal information

2 Nov. 2017



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 10:04 AM  
**To:** Legislative Services email  
**Subject:** My personal STR story

Hello, This isn't the first time I've shared my STR situation, in fact I even shared it on my Application for Business Licence. However, I am sharing it here, again. Our STR is not a 100% commercial endeavour. It is, at most, used as STR 60% of the time and that percentage is and will continue to decrease dramatically as our personal use will increase in the coming year(s).

I am one of the lucky few who will be grandfathered for STR as I am at The Janion. I purchased my unit, years ago, with the aim to be using it as often as possible, personally, because I love the City of Victoria and want to be there as much as I can. I took a partner, in order to purchase, and she and her husband also aim to use it personally, as often as possible. She's from Victoria, has lots of family there

personal information

You are not taking people like us into account when you set your fees or ask BC Assessment to deem us Commercial Use. We aren't, at least not 100% of the time. We just rent our 300 square foot studio through AirBnB and HomeAway, when we aren't using it ourselves. If we didn't rent through AirBnB, we wouldn't suffer dramatically, financially, but the City of Victoria would. They'd lose out on the spending power and habits of all of the guests we host.

The solution can not be a one-size-fits-all, punitive approach, using inflated fees from law-abiding owners to finance the policing of others. The CRA does not view us as 100% Commercial. They view every night unoccupied, as well as the nights our partners and I actually are guests ourselves, as personal use. Which is completely fair. You are not being fair. You are not seeing, nor listening, to us and others like us. You've got blinders on.

We have purchased a Business Licence to the end of this year. We will await the CoV's final call on BL Fees and see if it's worth us taking one for 2018. I/we will fight to the bitter end any attempt to deem us Commercial, at least at a 100% level. Whatever happens, I can 100% guarantee you that punishing us for earning the right to purchase at The Janion and to use it personally, as well as provide temporary short-term accommodation to guests and visitors, will NOT result in our unit being offered up for long-term rental. It just won't. The City of Victoria will lose out and, so will we but not as much as the City and its coffers will.

You have heard these individual-owner stories from others, I know. You've had your Open House - though very few staffers or Council members chose to attend and truly listen - and you've had many similar views expressed. So, again, here I am reiterating, please reconsider. Do not treat everyone the same way. Look at the many different situations and, come up with a solution that is fair and in keeping with other levels of government and their views of STRs, from a tax/business standpoint.

Regards,

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 3:47 PM  
**To:** Legislative Services email  
**Subject:** New Business Regulations

Dear To Whom It May Concern:

We are writing this letter today to express our direct opposition to the proposed changes for short term rentals in Victoria. We strongly urge council not to proceed with the proposed new business regulations. We own one apartment, in a transient zoned building. We have a current 2017 City of Victoria business license, and have had a city business license since we started renting our apartment. We follow all bylaws of our strata lot pertaining to short term rentals. According to documents presented on the City's website, we have legal non-conforming status. Yet, even though we have followed all the municipal rules and regulations, the proposed fee of \$2500.00 per year is a punishing increase of 2500%. How does council think this is appropriate? It appears council believes fully compliant short-term rental owners should bear the entire cost of monitoring and enforcement of the new bylaw.

As part of a more measured implementation plan, to be fair to the many current law abiding Short Term Rental owners, will Council please consider a gradual increase in license fees? Even doubling fees to \$200 in year one (2018) would be a large increase. If it is fair to "grandfather" compliant short-term rental owners (legal non-conforming), it is similarly fair to avoid a huge licensing fee increase.

The City's documents suggest third party monitoring, temporary staff and added enforcement will cost approximately \$500,000.00. At \$2500 each, the first 200 license renewals, will cover that cost. The proposed licensing fee of \$2500.00 looks like a cash grab on the backs of Short Term Rental owners. It was stated that over 1500 short term rental listings appear in Victoria. If half of those are required to pay the proposed licensing fee, that would result in \$1,875,000.00 revenue for the City. In addition, we collect MRDT, PST & GST on all short-term rental reservations and remit quarterly.

Furthermore, why did council not consider enforcing the non-compliant short-term operators who a.) were operating in non-transient zoned areas of the city and b.) enforce short term rental owners operating without a license? This approach would have been an acceptable gradual start, instead of "bringing down the hammer" on all short-term rentals, lumping us into one large group even though we operate very differently.

Lastly, the city claims to be making these changes to short term rentals because of the concern for availability of housing for residents of Victoria. Would it not make more sense to enforce the short term rentals in non-transient zoned areas of Victoria, introducing large sectors of availability for residential housing! In addition, enforce those owners who are currently operating short- term rentals in transient zoned buildings/areas, to acquire a 2017 business license by the end of this year. If owners do not comply at that time, they may then face a penalty. Council's proposal is penalizing all short-term vacation rentals owners, even those who comply to all requirements (license, transient zoned, strata bylaws). Lack of affordable housing is a very complex problem in most cities across the country. In our opinion, council's approach on proposing the new regulations will not solve this problem.

Thank you for your time.

Sincerely,  
personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 4:35 PM  
**To:** Legislative Services email; Victoria Mayor and Council  
**Subject:** Proposed change to short term rental zoning for downtown Victoria

To the Mayor and the City Council

I would like to urge the City Council to postpone and re-evaluate the proposed re-zoning of the downtown core for STVR's.

I have read many of the submissions given by both sides as well as the report submitted to Council by the City officials to try and understand what motivated the City Council to move so swiftly on this issue?

Our immediate family consists of personal information . Between us, we own 4 condos in downtown Victoria, purchasing our first one in 2007. In the last 10 years, 3 of our family members have lived in these condos for between 3 and 7 years. We have also used them as STVR's and for longer term rentals. Currently, 2 are registered as STVRs and 2 have longer term tenants. My partner and I have (and still serve) on the strata councils of two separate buildings. I believe that my perspective has been gained through my experience as a **landlord, strata council member and tenant** in the downtown area of Victoria. I do not have the narrow perspective of just one stakeholder group.

My experience has been the following:

- **STVR tenants are quieter, more respectful of my properties and the strata rules than long term tenants and there is far less wear and tear on the property.**
- The "issues" of noise, damage, "increased security risks", etc. put forward by concerned persons are largely a prejudice and not borne out by experience. **90% of the complaints received on our strata councils were about long term tenants.**
- **The STVR tenants spend far more \$/day in our city than the "residents".** This might be obvious, but worth mentioning it for the benefit of Council who is serving the interests of **ALL** the stakeholders in Victoria. ie. that includes restaurants, retail outlets and other tourist businesses, not just "concerned citizens" and possibly hotels.
- when discussing the concerns of owners, tenants and other strata council members wrt STVRs, most of them are based more on feelings, prejudice and popular myths rather than facts and figures.

**Furthermore, our family travels to many parts of the world** and we very seldom use hotels; our primary accommodation is booking private, self contained accommodation through AirBnB. If a region has no private accommodation, we skip it and go somewhere else. We do not want to rent a room in someone else's house. We believe that many baby boomers and young professionals who are traveling feel this way. Feedback from our guests is that once they have stayed in self contained, private accommodation with a kitchen, they will never stay in hotels again. If Victoria stops offering this type of accommodation, tourists will choose another destination ..... they will not book hotels or rent a room in a house instead. There are always plenty of other destinations to choose from. If Victoria stops catering to this huge, fast growing sector of the tourist market, the whole city will lose out on tourist dollars. We canvassed a lot of our friends and guests, who said the same thing. **I believe we represent the fastest growing segment of the tourist market which is why AirBnB has blossomed and why the AirBnB market in downtown Victoria has grown so rapidly in recent years.**

I will not re-iterate the many points from both sides. However, I would like to make some observations on the process and the way the City has approached this issue. I was under the impression that the Council was there to serve the interests of ALL stakeholders in the City, not just specific groups. My observations are:

1. that the quality and scope of the pro-STVR group had a much wider perspective on the issues, were well supported by documented evidence and tried to address the needs of a wider group of stakeholders (see David Langlois, Michael & Karyn Allard, AirBnB and David Chard as examples).
2. The report to Council by the City officials appeared to address a very narrow view of the issues and based on some discussions and "experiences" of a number of other municipalities. The main focus seemed to be on whether STVRs were reducing inventory available to long term renters and driving up prices and whether they are competition to hotels. I saw virtually no hard statistics, surveys, etc. to support the findings of the report. There appeared to be no evidence that hotels were suffering negatively as STVRs appeal to a different type of tourist including "snowbirds". There was no attempt to look at creative options being considered by other cities, eg. Seattle. There was no analysis of the wider implications to other stakeholders like tourism, restaurants, retail, etc.
3. The submissions by the anti-STVR group <sup>personal information</sup> petitioners on the streets, community groups, etc.) were not supported by data, statistics, etc. In fact, they were often based on prejudice and/or perpetuating falsehoods based on rumour.

**In summary**, it appears to me that the City is reacting in a knee jerk, regressive fashion to a narrow group of vocal stakeholders creating negative publicity by using inflammatory language and accusations to guilt the City Council into feeling badly about the less advantaged. AirBnB, Uber, etc. are part of our new reality; we need to be creative in addressing these new realities, not reactive.

I am very disappointed that the Council would consider only the needs of a vocal minority group when the quiet, hard working majority, eg. local businesses, investors and taxpayers will be negatively impacted by such changes, not to mention loss of revenue to the City. With respect, this is Economics 101. For example, why not be creative and use some of the revenue generated by tourists to build affordable housing for the disadvantaged which would benefit everyone and the city as a whole?

**I believe the new regulations will not achieve their objectives because a lot of the newer buildings in downtown Victoria that have STVRs will still not be affordable for the low wage earners, even with the change in regulations. The net effect could be less \$ for the City (less tourists and low to no tourist growth due to a perception of Victoria being tourist unfriendly) and everyone is worse off. If STVR zoning is restricted to say 5 blocks of the inner harbour, the City will not lose tourists and there are still plenty of areas for long term renters to live in.**

Sincerely

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 8:30 PM  
**To:** Victoria Mayor and Council; Marianne Alto (Councillor); Chris Coleman (Councillor); Ben Isitt (Councillor); Jeremy Loveday (Councillor); Margaret Lucas (Councillor); Pam Madoff (Councillor); thornton-joe@victoria.ca; Geoff Young (Councillor); Legislative Services email; Community Planning email inquiries; Lisa Helps (Mayor); Business Licence  
**Subject:** Proposed Changes to Short Term Rentals

To whom it may concern,

We are writing this letter today to express our direct opposition to the proposed changes for short term rentals in Victoria. We strongly urge council not to proceed with the proposed new business regulations. We own one apartment, in a transient zoned building. We have a current 2017 city of victoria business license, and have had a city business licence since we started renting our apartment. We follow all bylaws of our strata lot pertaining to short term rentals. According to documents presented on the City's website, we have legal non-conforming status. Yet, even though we have followed all the municipal rules and regulations, the proposed fee of \$2500.00 per year is a punishing increase of 2500%. How does council think this is appropriate? It appears council believes fully compliant short term rental owners should bear the entire cost of monitoring and enforcement of the new bylaw.

As part of a more measured implementation plan, to be fair to the many current law abiding Short Term Rental owners, will Council please consider a gradual increase in license fees? Even doubling fees to \$200 in year one (2018) would be a large increase. If it is fair to "grandfather" compliant short term rental owners (legal non-conforming), it is similarly fair to avoid a huge licensing fee increase.

The City's documents suggest third party monitoring, temporary staff and added enforcement will cost approximately \$500,000.00. At \$2500 each, the first 200 license renewals, that will cover that cost. The proposed licensing fee of \$2500.00 looks like a cash grab on the backs of Short Term Rental owners. It was stated that over 1500 short term rental listings appear in Victoria. If half of those are required to pay the proposed licensing fee, that would result in \$1,875,000.00 revenue for the City. Is it the money council is after? In addition, we collect MRDT, PST & GST on all short term rental reservations and remit quarterly.

Furthermore, why did council not consider enforcing the non-compliant short term operators who a.) were operating in non-transient zoned areas of the city and b.) enforce short term rental owners operating without a licence? This approach would have been a acceptable gradual start, instead of "bringing down the hammer" on all short term rentals, lumping us into one large group even though we operate very differently.

Lastly, the city claims to be making these changes to short term rentals because of the concern for availability of housing for residents of Victoria. Would it not make more sense to enforce the short term rentals in non transient zoned areas of Victoria, introducing large sectors of availability for residential housing. In addition, enforce those owners who are currently operating short term rentals in transient zoned buildings/areas, to acquire a 2017 business licence by the end of this year. If owners do not comply at that time, they may then face a penalty. Council's proposal is penalizing all short term vacation rentals owners, even those who comply to all requirements (licence, transient zoned, strata bylaws). Lack of affordable housing is a very complex problem in most cities across the country. In our opinion, council's approach on proposing the new regulations will not solve this problem.

Yours very truly,  
personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:30 PM  
**To:** Legislative Services email  
**Subject:** Proposed regulation on short term rental

Hello,

Thanks for working on making clear rules regarding the short term rental in Victoria.

I think it's really important for renters, home owners, and visitors if the rules are as clear and simple as possible as you have noted in the report.

I would also like to mention that there is also a possibility of being a STR AND provide long term rental. People are moving to Victoria for various reasons and various time. Some might provide STR during the summer months for tourists and switch to long term (6 to 9 months) rental to people who are just looking for a temporary accommodation before moving back home, or buying a home etc... When those STR will be charged with a \$2500 business licence fee they might not be willing to provide mid term (3/6/9 months) rental as they will need to recover the cost of their business licence.

Just my thoughts.

Again, I want to thank you for the diligent work your are doing and taking good practices into consideration when proposing new policy.

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:41 AM  
**To:** Legislative Services email  
**Subject:** Proposed regulations for short-term rentals in Victoria

It's absurd to shut down all short-term rentals in Victoria when we are seeing an upswing in tourism. Many people who want to visit this city cannot afford hotels or else want cooking facilities while they stay here. The citizens who offer STR accommodation to visitors provide an important alternative for visitors and people who are here for work, study, or medical reasons. I understand that the city wants to increase affordable long-term rentals in the city, however it's unlikely that this move will do much to achieve that goal. Most people who own short-term rentals cannot afford to offer rents less than market prices. And why should people who have invested in downtown Victoria take a financial loss to solve a societal problem? It's unfair to target a small group of owners who are simply trying to create a way to supplement their pension income or make their mortgage payments. The proposed license fee of \$2500 is cruel and punitive. I suggest the city look at ways to go after owners of multiple units and tax them or shut them down while allowing people who have invested in one additional STR to continue. Take a look at what Seattle has done. It's a much more nuanced approach that doesn't create hardship for individuals.

personal information

Victoria BC



**Rob Gordon**

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:31 AM  
**To:** Legislative Services email  
**Subject:** Proposed Regulations on Short Term Rentals

Good day,

I would like to provide my input supporting the ability for homeowners to list their units as short term rentals.

It makes the city more attractive to tourists due to the shortage and extreme pricing of hotels here, which contributes immensely to the local tourism economy. It also allows young or middle class people the chance at owning a home here in the Victoria area, given the very high real estate prices.

The hotels which generate hundreds of thousands or millions in revenue are upset because they are losing their monopoly as visitors have more options for experiencing this great city. However, individual homeowners should not have the opportunity to pay down their mortgages just so hotel owners can become wealthier while less tourists can afford to come here.

Modern travelers are increasingly using the sharing economy / short-term rentals. It would be a shame to take our city off of the list of potential destinations for these people.

At the same time, if the proposed legislation moves forward and legitimate hosts pay the appropriate fees and complete the appropriate paperwork, the city absolutely must shut down the hosts who are not in compliance.

Thank you for your consideration,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 10:52 AM  
**To:** Legislative Services email  
**Subject:** proposed regulations on short-term rentals

Hello,

I am writing as a 10 year resident of the city of Victoria (previously Saanich). Renting my home (apartment) on Airbnb while I am away has allowed me to live debt free and spend at local shops while I am home.

The ability to rent my home has not changed my travel plans or travel spending habits, however because I have additional money coming in while I am away I do not have to spend as much time saving when I am not on vacation, allowing me to visit local restaurants, festivals and other events that I would not otherwise be able to. In addition since I started renting my home while away I have paid zero dollars in credit card interest. These factors combine to keep more of my dollars in the local economy.

If I were to purchase a house in the future (which I plan to do) the ability to rent out my living area while I was away would help pay down any mortgage and would be one of the largest factors in my choice to buy in a particular municipality.

As an economist I am appalled at the proposed regulations. The city limiting peoples' ability to make use of an underutilised asset is not the way of the future. Limiting this type of use will increase the demand for land that is already extremely high in this city. The exorbitant hotel rates in the summer months highlight this demand that the new regulations will only compound.

By all means restrict people from running a business. But a much better model to restrict this kind of use would be the one adapted by some other cities where the number of days a property can be rented is restricted to x days per month or per year.

Lastly, please do tax us! I have no issue with having to charge guests the same hotel tax rates that hotel guests have to pay. The obvious solution would be to have those taxes applied by airbnb and remitted to the city. Thus, there would be little administration cost to the city and everyone would be on a "level playing field".

Allowing airbnb rentals will keep more money in the community and less in the head offices of marriot, best western and the like.

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 8:08 PM  
**To:** Legislative Services email  
**Subject:** Proposed regulations on short-term rentals

Hello,

I am writing to express my concern that the regulations on short-term rentals will be amended to prohibit them in the city of Victoria. I am clearly not in favour of such an amendment.

I am a single mother who gleans about 50% of my income from rent. When I am not renting my suite, it is an ideal place for my out-of-town family and friends to stay. I come from a personal information and my house is small, so my rental space is very important to my family. Should I change my suite to a longer-term rental, I would greatly decrease my income, and have nowhere for my family to stay.

In addition to renting through airbnb, I am often booked by the Belfry Theatre to house their artists. The Belfry is an active, vibrant community resource and without the reasonable rents that I, and others, offer to them, they will not be able to afford the quality of artists that Victoria has come to know and admire. In addition, personal information and have come to rely upon the many connections I make through housing Belfry artists. My career is literally dependent upon the colleagues I meet through my rental situation.

In summary, should I *not* be able to rent short-term:

- I would lose up to 50% of my income
- I would have nowhere for my friends and family to stay when they visit Victoria
- I could no longer support the Belfry Theatre
- I would no long make significant career connections through the artists who stay in my suite.

I understand that housing is in short supply in Victoria, but I am also aware of the many housing development projects currently active in this city. Punishing hardworking people is not the answer.

I ask that you protect working people, professional theatre and keep short-term rentals in Victoria.

Many thanks,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:08 AM  
**To:** Legislative Services email  
**Subject:** Proposed short term rental restrictions

Hello,

I am writing as a 10 year resident of the city of Victoria (previously Saanich). Renting my home on Airbnb while I am away has allowed me to pay down debt faster and have more money to spend at local shops.

The ability to rent my home has allowed me to pay down my mortgage faster than I otherwise would be able to. Which in turn allows me to spend less money on interest and more money in the local economy.

As an accountant I am appalled at the proposed regulations. The city limiting peoples' ability to make use of an underutilized asset is not the way of the future. Limiting this type of use will increase the demand for land that is already extremely high in this city. The exorbitant hotel rates in the summer months highlight this demand that the new regulations will only compound.

By all means restrict people from running a business. But a much better model to restrict this kind of use would be the one adapted by some other cities where the number of days a property can be rented is restricted to x days per month or per year.

Lastly, please do tax us! I have no issue with having to charge guests the same hotel tax rates that hotel guests have to pay. The obvious solution would be to have those taxes applied by airbnb and remitted to the city. Thus, there would be little administration cost to the city and everyone would be on a "level playing field".

Allowing airbnb rentals will keep more money in the community and less in the head offices of marriot, best western and the like.

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:51 PM  
**To:** Legislative Services email  
**Subject:** Regulating AirBnb

I like the general direction of your new by-laws, seeking to allow short-term rentals, but am concerned by a number of factors:

- The length of 'short-term' has different meanings to different people. I just took a parental leave from work and our family went travelling for 4 months. This would not qualify under your definition of less than 30 days, but certainly is regarded as short term to us as long-term home owners. We would not have been able to afford to travel if not for the income from renting our home. And our home would not have been in the 'normal' rental pool for only 4 months while we were gone.
- I am concerned that applying for a business license may come with overly-burdensome documentation (as cities tend to require). The city will shoot themselves in the foot through this approach, by reducing our cities hospitality for tourists.
- The costs associated with applying for your business licenses don't make sense. If a couple want to AirBnb their home for one weekend of the year, it won't be worth paying a \$200 business license fee. And a \$2500 fee for non-primary residences seems very high. Sounds like an under-handed cash grab, especially as this is already taxable income.

I think AirBnbs should be allowed with very little regulation. Homeowners do not need the local municipality to micro-manage their residential dealings. Certainly there are growing pains as the market gets used to new forms of accommodation for travellers, but the market will settle itself out over time and should be allowed to do so. If more rental housing is needed in the city, this should be purposefully built.

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 11:00 AM  
**To:** Legislative Services email  
**Subject:** proposes legislation on short-term rentals

To Whom it May Concern,

I am writing to you in regard to recent proposed legislation on the subject of short-term rentals in the city of Victoria.

To give you a little background, my husband and I live in Mill Bay and are property owners in two condo buildings in the downtown area. We bought our first one about personal information with the idea of having a place to stay on our frequent trips into the city. We had always hoped to lend it out to family and friends when we weren't using it but became aware of the short term rental market through other owners in our building. We became aware that we were in a Transient Zone meaning we were legally allowed to use our property this way. We purchased our second personal information as we happened upon the perfect little unit and thought it a good investment and again, legally allowed to rent short term. We divide our time between the 2 units.

In light of recent developments on the subject of short-term rentals we felt we should add our comments to the debate.

While we understand there are challenges with management of the recent growth of the home-sharing industry, this trend towards shared economies continues to grow throughout the world and on many fronts, Uber and bike/car sharing are the first ones that come to mind. The internet has offered far-reaching changes to the global community and economy and this trend is just the latest offering.

We are in agreement with the city that there needs to be regulations put in place to address concerns that have arisen. We believe that trying to effectively close the door on this new and exciting trend seems short-sighted. After recently traveling extensively in Southeast Asia and Europe, I am impressed how cities around the world have embraced and managed this new way of doing things. While we are ardent defenders of the quaint, small town feel of Victoria, we recognize that to compete in the tourist market which is definitely a huge revenue source for the city, we have to keep up with these changes. People are traveling differently now, looking for a "local" experience that you can't get from a stay at a hotel.

We are very proud of the way we manage our 2 rental units. We take great pains to screen our guests, recognizing the potential impact to our neighbours. We have always operated within the rules of our strata and the city bylaws. The proposed changes would unfairly cause financial hardship to us and others like us who, in good faith entered into this investment. Being "grandfathered" in for the period of our ownership of these properties doesn't address the drop in resale value due to these new restrictions that would be put on new owners. I don't propose to fully understand the reasons behind the proposed changes but they seem to be "throwing the baby out with the bathwater" so to speak. We believe the vast majority of short-term rental owners are responsible, like-minded individuals who pay attention to the rights of their neighbour and work within the law.

I would respectfully suggest the following as a possible solution:

1. If the low vacancy rate in Victoria is the main issue behind these zoning/bylaw changes, invest the City of Victoria resources to effectively police those individuals who are operating outside the rules set out by the city. This seems a logical place to start and would undoubtedly free up many units into the long term rental market. This would also help address the concerns of property owners in areas that are not zoned appropriately.

2. If the fact that Airbnbs are not currently legally required to have business licences or pay appropriate taxes, come up with a system that is fair and equitable, given the fact that they are essentially operating as businesses. This

would allow for better monitoring as well as adding to the tax revenue for the city. This would also address concerns of the hotel lobby in the city that are likely feeling the inequities at play.

3. Establish a set of guidelines for operation of a short-term rental property, taking into consideration the rights of all interest groups: other owners, strata councils, hotels, the City of Victoria, etc.

Sincerely,  
personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 2:36 PM  
**To:** Shannon Jamison; Thom Pebernat; Marianne Alto (Councillor); Legislative Services email  
**Cc:** Checked In Victoria; personal  
**Subject:** personal information 599 Pandora business license

Dear Mayor and Council, City of Victoria,

I ask you to please consider other methods for funding the campaign to regulate STR's other than by fining the legal operators who have done their due diligence by purchasing and operating in a legal way. Shutting down legal STR's in Victoria will not solve its housing crisis.

About half of the 300 legal STR units are owned by people like me, for use as vacation and later as retirement homes. I pay property tax, utilities, mortgage, insurance, management and cleaning fees, all of which go to companies and individuals in Victoria. There is little left over. If I am forced out, then perhaps my unit will have to be sold, leaving fewer potential 'affordable housing' options. Out of those housing options, are any of the high-end condos that can rent between \$1500-\$2500 really considered to be 'affordable housing'? According to CFAX, with the 3500 rental units coming on board in the next 18 months the vacancy rate will go to 4 – 5 %.

"Charging the business license fee of \$2500 will 'level the playing field.' With whom? Are the STR's making too much money? Does the city feel it needs more income to pay for tourism?

Before, the city of Victoria had great foresight when they included STR's in transient accommodations because it is a great way to travel for business people, film crews, families visiting relatives in the hospitals, families visiting elderly parents and families that cannot afford \$450/night with no kitchen.

STR's serve a valuable place in the market – cutting them out only helps the hotel chains that send their money out of Victoria. How about some fair competition? The people who own STR's include locals and others that have invested their hard earned dollars into a legal operation and now the city is trying to take that away from them. I am not rich, and not big corporation. I want to be able to live in Victoria when I retire, and this is the best way I can manage it. Please let people like me continue to contribute to Victoria until I am able to live there full time.

Yours truly

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 10:58 AM  
**To:** Legislative Services email  
**Subject:** Re: Airb&b / short-term rentals

Dear Sir / Madam,

No one should argue that Airbnb is a great creation. It might have some impact on hotel industry and long-term rental market, but before we rush to interfere, we should give it a good thought.

If people like Airbnb better than hotels, we can bet it is not mainly because hotels are subject to GST/hotel room tax while Airbnb are not. Many articles and researches have already provided detailed analysis on this subject. Simply to put, Airbnb can provide the things which hotels cannot. It has much less to do with the taxes.

As to the impact on long-term rental market, first, a lot of Airbnb are the places which previously were not on the long-term rental market anyway. In most cases, if some landlords like the short-term rental than the long-term, it is not because the short-term may or may not generate more revenues. In fact, many other factors play more important roles in this choice making. Most Airbnb hosts can confirm that with you. In addition, we have to rely on the market force to work. If too many Airbnb on the market and become over-supply, many short-terms will go back to the long –terms; the long-term rental shortage will also attract more supplies (new developments and new landlords go into the rental market).

There is not much benefit economically to force Airbnb hosts to register and pay licence fees. It just creates “paper works” for every party involved. If this eventually leads to get Airbnb hosts pay GST / hotel room tax, I'm afraid it won't work without rewriting tax codes by the feds and the province. In order for a business to be subject to GST, its annual sales have to reach \$30,000. I double how many Airbnb hosts are able to collect \$30,000 annually. For the hotel room tax to work, likely a major change to the tax act is also required.

We should not waste our time to fight against Airbnb this great creation when we have so many other important things to deal with.

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:39 AM  
**To:** Legislative Services email  
**Subject:** RE: The City of Victoria is currently accepting feedback regarding their proposed regulations on short-term rentals.

I have a small (approx 425 sq ft) semi one-bedroom suite in my house (bedroom is partly open to living room area and there is no closet in bedroom). Due to the size of the suite, it is not suitable for couples or families. I have tried to rent out the suite for longer terms, ie. one-year, but had very poor responses (mainly due to size of suite). The suite, however, is perfect for a student or for short-term rental.

Due to the cost of purchasing a home in Victoria, I need income from my house and I rent out my suite with AirBnB in the summertime only and then rent to a University student full-time during the school-term of 9 months.

Based on proposed regulations in Vancouver, even though I own my house and live in it full-time, I would not be allowed to do the above rental arrangements. I would like the City of Victoria to consider my situation when proposing their regulations. I would like to see regulations in place where there is no owner living in the actual property on a full-time basis.

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 3:02 PM  
**To:** Legislative Services email  
**Subject:** Re: Why STR are good for the community

During the beginning on the internet being used as a business tool

personal information

During this process I became interested in knowledge management and cultures that are both innovative and deliver excellent services. I came to understand that "Intellectual Capital" was more important than money and physical assets to be successful in today's economy. Intellectual Capital is defined as Human Capital; Systems Capital and Relationship Capital which all flows into continuous innovation.

Recently I have met many of the STR owners and I have been impressed with their intelligence, effectiveness and efficiency. They are coming together in a collaborative manner and have the capacity to do something very special for the community. Unlike large companies there is a powerful synergy that is available for a group of interdependent groups.

I am confused why the council would want to have this group focused on competing against the city council rather than focused on common objectives that will allow Victoria to be excellent which in turn will attract both companies and tourists. I am totally confused why Tourism Victoria would be worried about "over tourism" while advertising they want to double the number of visitors to our city. Where will these people stay? What will they tell friends and family? How will businesses be able to employ citizens that need both a job and affordable housing?

Victoria citizens are interdependent not independent and "win-win" solutions that grow the city the right way involve innovative people who are vested in the community. People who own a unit downtown but live elsewhere in the Victoria area are now stakeholders who do more than visit downtown.

Bottom line is that STR's are a powerful use of intellectual capital in the total community. An engaged community is a powerful community that can compete in the next 20 years. An alienated community (and that represents a lot of people who do STR's that have attended meetings of the council and read stories) leaves us unable to leverage our assets of good weather etc. Will a person staying in Seattle come over to Victoria if there are a very limited number of STR's. Of course they won't and Seattle with their innovative win-win solution makes the proposed solution of Victoria city council look like an uninformative and unimaginative approach.

Please get out of the box and move forward with an understanding of the new economy.

Thank you

personal information

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## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:41 AM  
**To:** Legislative Services email  
**Subject:** short term rentals

I am writing about the proposed \$2500 license fee to operate a short term business. I purchased a unit in the Janion at 360sqft! This is certainly not large enough for a person to live in full time. This was purchased with the correct zoning in place knowing it would never rent out to a full time tenant and come close to covering it's costs. Once you add the mortgage, the strata the insurance and all the bills it just doesn't make sense! If the \$2500 license comes into affect this will drop the value of this very purpose built building that the municipality allowed! To allow such a building (without parking) and then to take away it's use, or not take it away but rather charge such astronomical fees, it makes the units not valuable to anyone, I won't be able to use it, or sell it but will have this debt of a few hundred thousand dollars that will almost instantly be cut in half. This is a mistake of city hall! Victoria allowed the building, and now you are working to take away it's use. As you know the units rent out for 99/nt and are vacant often. You can do the math, mortgage is 1000-1500 depending on the unit, then you have strata fees 200-300, then hydro, cable/internet and a parking pass of about 250/mnth to use outside parking, you add the licence and all of the sudden, we have several units for sale! Guess what, NO buyers! The equation just doesn't work. When you look at a permanent renter, they don't exist either, my unit at 360 sq ft is actually on the larget side, many are just under 300sqft and even at 360sqft, there is NO WAY someone could live in that space on a full time basis, especially without parking. The city allowed this building! To take away the ability to cover itself or come close to is a massive mistake on the city's part. To have the individual owners pay for that is unacceptable.

Kindly acknowledge receipt.

Regards,

personal information  
Janiion Owner

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 6:22 PM  
**To:** Legislative Services email  
**Subject:** Short Term Rentals

We believe short term rentals is important to us as it provides a service to people who can't afford hotels, women who don't want to be in a hotel downtown and allows for more intimate exchange for foreigners and visitors to Victoria. Our space sits empty when the grandchildren are not visiting and helps with income supplement for homeowners who own their own home, especially those without pensions. We have stayed in Air BB short term rental around the world and prefer it to hotel stays - we get to meet locals and experience their home and lifestyles. Also few hotels have cooking facilities and having the option to cook or eat food in a short term rental is much healthier.

personal information

Sent from my iPhone

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 2:29 AM  
**To:** Legislative Services email; Victoria Mayor and Council; bmackenzie@timescolonist.com  
**Cc:** personal information  
**Subject:** Regulations on vacation rentals in Victoria

Please add my comments to the official record;

In regards to the new regulations brought forward by Council on September 21st, I feel that as a taxpayer that is dependant on the revenue from my Airbnb rental to pay my mortgage and my city taxes, I and hundreds others are being unfairly targeted by this legislation. I feel that the lobbying from big-name developers and hotel owners have been able to influence city council to bring these regulations forward that specifically target their competition. I feel this legislation is also a political move by certain politicians to give the "appearance" they are doing something to "address" the issue of rental availability. When really this is mostly just an effort to take a cut and make a cash grab from the vacation rental industry that is helping to fuel the popularity of Victoria as a tourist destination, and appease the big-name Mainland developers that help fund local election campaigns.

This legislation will hurt tourism in Victoria because there will no longer be an alternative for the thousands of would-be guests who can't afford the extremely-high pricing from the local downtown hotels, but want to visit Victoria and enjoy a small taste of luxury and spend the money they save instead at local restaurants and businesses, and tourism related activities.

I, like hundreds of other tax-paying residents here purchased my home in a location that was zoned transient and vacation rental-allowed specifically so that I would be able to afford to own a home in this amazing, beautiful city.

Unfortunately Victoria isn't able to supply me with the job in the field I work in here, so I like many others I must commute to the Mainland to earn an income to live and pay my mortgage and taxes.

This is very costly for me to commute back and forth, but it is worth it to be able to enjoy the lifestyle that attracted me to this amazing city I call home. The only thing that makes the costs associated with having to work outside this city affordable, is that I can let tourists come and enjoy my beautiful home in the time I'm away working. The money I collect helps to pay my mortgage and employs a local woman to manage and clean my apartment while guests are here and I'm away working.

These tourists have come from all over the world and leave with 5-star experiences of Victoria.

My home in one year so far has attracted over 50 guests from all over the world that have come here to this city as tourists and have spent their money at the local shops, pubs, stores and so forth.

Because I have a work schedule that only allows me to spend my weekends here, there is no chance I can have a tenant in place of my current, flexible home-sharing situation that Airbnb affords.

With these new regulations I will be forced to leave my prime location condo empty and vacant while I work. I will now face a struggle in the future to pay my mortgage expenses here, while also paying for temporary accommodation on the Mainland while I work there. Just so that the city politicians can say they're taking "steps" to make more housing available to local renters, while they are actually forcing me to leave my condo vacant, and there will no longer be 50+ guests from around the world bringing thousands of dollars to spend in the local economy.

As a new and permanent resident to this great and amazing city, I will be forever voting for councillors and mayoral candidates that did not support this misguided and unfair legislation. I have voted in every single-election I have been

eligible to do so in my life, including all civic elections. I will be hence forth rallying all of the 158 other strata owners in my building alone to remember NOT to vote for any politician who supported and helped pass these biased and unfair regulations. Not to mention to do what I can to help influence the thousands of other Victoria property owners affected by these impending laws.

With all due respect and sincerity,

personal information

Victoria, BC

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:34 AM  
**To:** Legislative Services email  
**Subject:** short - term rentals proposed changes.

the proposed changes and high fee would be very negative for everyone involved in a recreational property in victoria . the owner could not use his property as intended for recreational purposes from time to time if forced to minimum 30 day rental term , or forced to pay high fees so that the property could still be available for his use and stay in the rental market, so he would probably be forced to withdraw the unit from any rental .

this would have the following effects :

1. the owner is denied quiet enjoyment of his property for the purpose that he bought it .
2. the total number of places available for rent in victoria would be reduced ..... which is very opposite to the city's stated reason for the changes. currently, the unit is available for both short term or long term rental (more than 30 days), depending on the rental market, and is also available to the owner for his quiet enjoyment from time to time. the proposed changes and high fees would make that impractical.

3. the changes would cause economic harm to everyone involved, including :

recreational property owners are denied quiet enjoyment of their property and income from the property when not using it.

tourists who use short term rentals .... may be discouraged from visiting, or be forced to stay in less desirable accommodation.

management personnel who manage recreational property for owners get no management income from the property.

cleaning and other service staff get no income from the property.

city then gets no license fees at all from the property. province and federal government gets reduced income taxes from owner.

regards,

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:31 AM  
**To:** Legislative Services email  
**Subject:** short term rental

Dear council, first off I want to say you are all doing a horrible job. I know your citizens of Victoria but you are all out of tune. If you were a Symphony it would be a disgrace to those musicians that play together and practice together. I will not swear not call out names nor be disrespectful but I will say that Council you should all be embarrassed with how bad of a job you are doing.

Now the main and only focus besides above is about short term rentals. So here goes.

Council we have a huge housing crisis and in order to move forward we need to understand that this issue is just not Victoria it is EVERYWHERE world wide so in order to solve or fix this problem you need to think outside the box and think in REAL terms. Meaning Victoria is very expensive but on the world stage it is cheap. So how do we control it or even do we just let it roll out because we have a lot of people moving to the lower Island. We have tech companies moving to Victoria with big dollars that are increasing the rent rates and value rates something you Never talk about you just praise the fact they are coming to fort street. You never talk about why the rates are getting so high. For example Retirees from around the world with large sums of money are buying above price because they can also tech workers coming with large sums of money are buying up because it is still cheap. Now something that you rarely ever talk about the amount of students that come every year to Victoria that have mommy and daddy paying for rent, thousand of students are taking up houses full houses, condos, apartments at above asking price or even just the price but which is already high because the parents are paying. Force Uvic Royal Roads and Camousun to free up thousands Not hundreds but Thousand of rooms just by them building for students. Also be aware in terms of build out. Oak bay Gordon Head Saanich All need to have a cap of 5000 square feet of a house. Whistler did it we can do it. Anybody building a 5000 and above square feet house is Not going to rent out a room or a back cottage or a suite. They are private high members and they should not have to But the sheer size takes away from those that would build and rent out something. Another thing you never talk about it the fact that Victoria is just plain expensive and a sleepy town. So let people know it is expensive and going to get a lot more expense so if you need to move away too get ahead that is what needs to done. A lot of us have done that. Stop blaming and look at what your not fixing and you will see the lack of foresight is within you as a council. You approved the Hudson rentals so you should know that a one bedroom with parking with bills is \$2000.00 per month. Who can afford this but a tech or a retired or a professional. The high rate of rent has everything to do with A) Victoria is cheap on the world market B) Tech companies are moving here C) Retirees that have money are coming here D) Every year we have thousands of students that mommy and daddy are paying for rent this is the truly biggest one you have no idea how big this is E) houses being built bigger than 5000 square feet every room counts and these people don't rent out they don't need to but then don't give them the allowance to build a fortress either. Now one other big factor and a very big factor is the Hospitality Industry in Victoria. The amount of workers for this industry is HUGE. So tell the CEO of the tourism and Hospitality to start pushing companies for Full Time or tell him or her to go and hide for lack of courage. The majority of this workforce is working part time in the busiest time let alone the four months of quite time. So if your average worker in this industry is working two jobs just to barely meet a full time job how do you think they fit in the A) rental pool or B) the buying pool. Thats Right the main industry of Victoria the workers have NO chance. Don't blame anyone other than the industry itself. No benefits No nothing for the majority of workers in the money making scheme of the largest industry the Hospitality industry. Face that and talk about that. Truly I dare you to be truthful and say "Hey Victoria the Hospitality part time workers truly do NOT have a chance.

Start being bold you started it with the expensive rainbow paint job you did the tearing up the streets for bike paths that junkies use to ride their scooters. Those are bold moves council and you need to do the same for housing like hey All money making Schools you Now have to supply four thousand beds by tomorrow at a rate that will make them stay there and not enter the open market. That is what truly needs to be done. The project you Allowed at Yates and Johnson two towers by Chard is a joke. This proves how out of touch you are. So you approved one tower to have restrictions. mmmm making under \$100,000.00 per year first time owner. Are you crazy that number should have been under \$60,000.00 and the craziest part is after only TWO years they can sell it to anybody no restrictions. So the so called restriction building is only for two years. What a joke. You should have passed it only with a full restrictions of always making a certain amount. You failed at that and you passed it. What a joke. Please start taking care of Current tax payers start listening and realize that **TWO** of our biggest assets are killing the housing market in terms of affordability 1) the Hospitality industry getting away with large amounts of part time and low wages and 2) All of the University and Colleges are getting away with not helping out. I truly hope you think outside of the box and with the response you are getting you select two groups of twenty people and learn from them Why and How. Please get outside of your minds and into the communities minds. As a family man a Victoria downtown Business man and someone that is from a town that I can't afford to live (Sidney) and a tax paying citizen also someone that went to Camosun and works in the Hospitality Industry, someone that has four bikes and hates the bike lanes I am reaching out to you and saying the bigger picture does not look good but it is the new world and things get corrected when the Big things get fixed. Please take action towards listening because you all have a lot to learn. Yours truly  
personal information

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Monday, Nov 6, 2017 6:11 AM  
**To:** Legislative Services email  
**Subject:** Short term rental discussion

Thank you for the opportunity to provide comment. A greater time frame for responding would have been appreciated.

Our reasons for providing accommodation:

We enjoy meeting people of all ages and backgrounds

As retirees, the extra income has been instrumental in allowing us to maintain and upgrade this aging house

This home has been in the family and continuously occupied by family members personal information  
The suite which we rent out was built with the house in the personal information  
Has always been occupied by family members or students  
Proximity to UVic and Camosun means students have sought out the space, often by word of mouth  
Our primary occupants during the year are students renting anywhere from 6 weeks for course work or research time up to 8 months covering a full academic year  
We have offered our suite free of charge on several occasions to accommodate refugee arrivals  
We do not rent out the full house

Bottom line: we strongly submit that we are contributing to the pool of available affordable housing in a city that has a shrinking supply.

Thank you  
personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 2:53 PM  
**To:** Legislative Services email  
**Subject:** Short Term Rental Feedback

To whom it may concern,

I wanted to write in as a local small business owner and Victoria resident to share my option about the proposed regulations on short term rentals.

As someone who has lived in Victoria for the last 10 years, I very much SUPPORT the bylaw amendment that would shut down future short term rentals. The current rental market in Victoria is viewed by myself, many of my friends, family and community members as elitist, and a deterrent to making this city healthy, vibrant and inclusive. I've seen many leave this city on the premise that they could not find a long term rental to allow them to stay in Victoria, despite their love of this city.

This bylaw would be a step in the right direction towards providing housing for the many Victoria residents who are in need.

Kind regards,  
personal information

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personal information

## Rob Gordon

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**From:** David Langlois <david@agentdavid.com>  
**Sent:** Friday, Nov 3, 2017 7:49 AM  
**To:** Lisa Helps (Mayor); Marianne Alto (Councillor); Chris Coleman (Councillor); Ben Isitt (Councillor); Jeremy Loveday (Councillor); Margaret Lucas (Councillor); Pam Madoff (Councillor); Charlayne Thornton-Joe (Councillor); Geoff Young (Councillor); Legislative Services email  
**Cc:** greatervictoriastr@gmail.com  
**Subject:** Short Term Rental Regulation  
**Attachments:** GVSTRA-Positions.pdf

Dear Mayor, Councillors and Staff,

The Greater Victoria Short Term Rental Alliance, GVSTRA, represents a significant group of short term rental owners in the City of Victoria. Please find attached our response to the proposed regulatory framework concerning short term rentals. We will be seeking direct meetings with Mayor and Council on this issue in the coming weeks as the city appears to be moving exceptionally quickly to implement what we consider to be a flawed regulatory regime, with little to no public consultation, or regard for property owners rights. We look forward to discussing this matter in a positive and constructive manner.

Best Regards,

David Langlois  
GVSTRA Committee  
personal information

### **GVSTRA Positions Regarding Proposed STR Regulatory Structure:**

The Greater Victoria Short Term Rental Alliance is a group of concerned and engaged citizens who either own or operate short term rentals, (STRs), in the city of Victoria. GVSTRA has been formed in response to what we perceive to be an unwarranted attack on the legal business of providing STRs in the city of Victoria. The GVSTRA is committed to seeking solutions for the STR industry in the city of Victoria. The GVSTRA would like to work with the city to create meaningful solutions but recognizes that legal action towards the city may be the only option available should the city not wish to recognize the rights held by STR owners and operators. The GVSTRA is committed to political action in support of owners and operators of STRs.

<b>Proposed Regulatory Item</b>	<b>GVSTRA Position</b>
<b>Application form</b>	
1. Two items proving principal residence	1. No position
2. If a renter a letter from the owner...	2. No position
3. If in a strata, a letter from the strata council permitting STR use	3. Strong objection. The city has no jurisdiction with respect to strata bylaws. Strata corporations have no standing in the issuance of business licences. Does this rule apply equitably to all strata properties in the city?
<b>Supplementary Material</b>	No Objections
<b>Fees</b>	
1. Home share \$200	1. Objection. This business licence fee is out of step with those of other accommodation providers
2. Commercial \$2500	2. Strong Objection. There can be no justification for a 2000% licence fee increase.
<b>Operating Requirements</b>	
1. Display licence number	1. No Objection.
2. Adhere to city bylaws	2. No Objection.
<b>Communication and Engagement</b>	
1. No formal engagement process	1. Strongly object. Communication and engagement with ALL stakeholders group should be a priority in any regulatory development process, particularly with the stakeholder group most affected. Stakeholders include those who are or are interested in operating STR, not only those deemed by the City to be eligible under current bylaws.
<b>Enforcement Strategy</b>	
1. \$512,000 third party enforcement	1. Strong objection. Enforcement of existing zoning bylaws regarding STRs outside of now legal non-conforming zones is straightforward and such an extravagant course of action is unwarranted and unjustified.

## **Application Form**

The requirement that owners of strata units must seek a letter of permission from their respective strata councils to operate an already legal short term rental is strongly objected to. The city has no basis in law in which to compel an owner of private property to seek third party approval for what the owner holds to be a legal and legitimate use. As the City points out in it's FAQ's:

"My strata bylaws state that short term rentals are not permitted in the building.  
Can I still have a short term rental?"

No. You must comply with your strata bylaws regardless of the City regulations.  
The City is not responsible for nor able to enforce strata bylaws."

"The city is not responsible for nor able to enforce strata bylaws." Compliance to strata bylaws is a matter solely between an owner and their respective strata corporation. It is the position of the GVSTRA that this requirement exists solely to create a potential friction point between STR owners and their respective stratas, in furtherance of their goals to eliminate STRs from the city of Victoria.

## **Fees**

The current fee for a transient accommodation unit is between \$100 and \$120. Doubling the fee to \$200 for a home stay licence is on the face of it unreasonable. Raising an entire unit licence fee by 2000%-2500% is wholly indefensible.

"Staff recommend the proposed fee structure to:

- recover the costs of reviewing and issuing licence applications and renewals
- 'level the playing field' between STR operators and traditional accommodation providers, especially as changes to provincial sales tax legislation are expected to take time
- ensure that commercial operators pay a fee commensurate with revenue generated, (especially important in Victoria, which is unique amongst municipalities for transient accommodation considerations in zoning bylaws)
- discourage casual operators who are unwilling to pay to operate"

The city of Victoria's justification for the increase makes it plain that the city is proposing a tax on STRs that it has no right to levy. The city has no standing to "level the playing field" between one accommodation provider and another on the basis of provincial taxation policy and presumes a bias in favour of the traditional accommodation providers without a basis in evidence. Further a fee linked to revenue generated by a rental property must be considered a tax and not a fee.

To put this into perspective, a single unit at, for example, the Janion, of approximately 300 square feet would be charged a business licence fee of \$2500.00. At the same time the business licence fee for the entire Empress Hotel in 2017 was \$2480.00. The city has forecasted an average business licence cost of \$162 for 2017 for nearly 9000 licences. An STR licence would be more than 15 times the average.

It is clear from this proposed "fee" structure that the intent of the city is to not only "discourage casual operators who are unwilling to pay", but to discourage all operators with the threat of exorbitant, and in the view of the GVSTRA, illegal fees.

## **Communications and Engagement**

Council and staff did not undertake any engagement with affected stakeholder group prior to proposing their regulatory framework. It is the hope of GVSTRA that feedback received concerning the proposed regulations be considered seriously and that amendments to the proposed framework be incorporated based upon received feedback. The fact that council chose to change the zoning of over 140 zones within the city in the span of less than three weeks with only one public hearing indicates that its practices in open and transparent governance are not consistent with its commitment to the public.

## **Enforcement strategy**

According to city documents, the entire budget for bylaw & licencing services is approximately \$1,300,000.00. The city is proposing to increase this budget by \$512,000.00, or almost 40% to enforce land use and business licence bylaws with respect to STRs. Further, it is understood that the revenues to be gained from this surveillance of taxpayers will be less than the expenditure. The GVSTRA believes this to be outrageous fiscal policy.

The city has taken no steps to identify the actual number and composition of the STR inventory in Victoria. The city does not know how many single units exist that are employed as STRs. The city does not know how many STRs are homeshares. The city does not know how many STRs are used both by owners and rental occupants, making them available only on a part time basis. The city does not know how many STR units are operated on a full-time basis. The city does not know how many STR units are within the legal, now legal non-conforming, transient zones. The city does not know how many STR units are outside of the transient zones. The city has not evaluated the economic and social benefit of STR units. The city has conducted little to no due diligence in identifying where and what, or even whether, there is a problem in the operation of STRs.

The GVSTRA holds that implementing an enforcement strategy that has not yet identified or quantified the nature of the problem to which it will be applied is irresponsible. Proposing such an unfocused enforcement regime with a budget equivalent to almost 40% of the current bylaw & licencing services budget, and proposing it be done by an outside third party is fiscally irresponsible.

## **Achieving Stated Policy Objectives of Availability and Affordability**

There is no clarity provided on the relationship between STR units inside or outside the transient zone in relation to the stated goal of increasing availability of housing, particularly affordable housing, in Victoria. The position is not based on evidence, a fundamental requirement in sound public policy.

Considerations are biased against taxpayers who seek to retain property assets in favour of those who seek rental accommodation without regard for the well being of owners hard pressed to maintain housing stock in light of ever-increasing costs and the realities of the marketplace.

It is a reality of the accommodation market that a segment of the population requires accommodation for short term periods (locum placements, term projects, medical treatment, school term start/finish, family events, etc.). The City is silent on how the legitimate needs of citizens and visitors will be met without hardship under the proposed regime. Similarly, the City has not presented analysis of data related to need for STR in the arts, academic, business and taxpaying constituent sphere. Indeed, the City has failed to identify the character and scope of STR from either the consumer or purveyor perspective.



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 2:05 PM  
**To:** Legislative Services email  
**Subject:** Short term Rental

Dear Council

I would like to have my voice heard in regards to the short term rental regulations.

This residence is my home to which I come to several times a year to enjoy. Until which time I am able to retire and settle there permanently.

I was able to renovate and beautified my century home and bring back to life this old lady, all because of short term rentals. Had we not taken the time to properly restore this residence, it most certainly would have been turned into a duplex, for which the land has been zoned.

I would like to be able to short term rent this home for several reasons; I want to maintain the property and house to excellent standards. I use my short term income to do this. I supply a home to families at a reasonable rate (some families can not afford Victoria hotel rates for an entire family) and then these families can enjoy Victoria. This in turn will also supply Victoria with tourism income. I also use a cleaning and yard maintenance company, so I use local businesses regularly.

There are many reasons to allow short term rental, with only one reason not to and that is to have more long term rentals.

I believe that only a small percentage of these homes will return to long term rentals, some will remain empty, as mine will. Some will be sold off to investors and/or builders who, in turn, will sell to investors.

Committing my house to a long term rental market negates the reasoning for renting my home short term, which is so I can spend time in Victoria myself.

Help us supply affordable rentals to your tourism industry and keep Victoria, Canadian and not an investment supply for wealthy foreign investors.

Thank you for your time!

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 2:37 PM  
**To:** Legislative Services email  
**Subject:** short term rentals.

this is to let you know that I disapprove of council' s plans to prohibit short term rentals in suites in houses and garden suites which are owner-occupied.

this will not improve the long term rental market as these owners will not be amenable to renting out to long long term. many of the owners need these suites to accommodate their own family members or friends and do not wish to be involved in a landlord-tenant relationship.

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 10:34 AM  
**To:** Legislative Services email  
**Subject:** Short Term Rentals

To whom it may concern,

My wife and I recently purchased a pre-completion condo in downtown Victoria. After purchasing our first home with the minimum down payment and seeing how the value of our property increased, we began to worry how our daughter (turning 1 year old in a couple weeks), would be able to get into the market in 20+ years. My wife and I used some equity to purchase this condo, that will be completing in the fall of 2018, for our daughter to one day move into.

We purchased this after an immense amount of due diligence, and confirmation of city zoning and bylaws/uses of the building when it completes. From there we came up with a business plan, based off approved uses and the city's zoning to rent the unit short term - completely legally. We are both shocked at the city's decision to change zoning and no one can answer our questions about how this impacts buildings that are under construction but not yet complete. Our business plan was to use the transient zoning to run a short term vacation rental, that would be completely by the letter of the law with business licenses etc. If this zoning is not grandfathered to us, we will be devastatingly impacted. How the city can make such a change without considering those of us in this situation and still providing no answers is quite dumbfounding.

If those reading this could put themselves in our shoes, they would see how great of an impact this would have. The change in value is immense, and this was a long term plan from local Victoria citizens. We aren't wealthy citizens who have hoards of these types of rentals, but we came up with this plan to purchase just one and followed the city rules and zoning and are potentially being burnt by sweeping and abrupt changes and will in the end have a substantial financial impact on my family and I. I am lifelong Victorian, that I would hope my city has some concern for.

If I could draw a hypothetical comparison, I couldn't imagine a family coming up with a business plan to start a business (ex. restaurant, bakery) and after purchasing the property and once they begin to construct their kitchen, already having paid a substantial amount of money, being told by the city that the zoning no longer allows their intended use.

Please consider those of us that are in this situation and are worried about the long term ramifications on my family and I.

Thanks for reading,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 10:16 AM  
**To:** Legislative Services email; Lisa Helps (Mayor); Victoria Mayor and Council; Community Planning email inquiries; Business Licence; Public Hearings; Ben Isitt (Councillor)  
**Subject:** Short Term rentals

Hello

I am emailing you all to let you know that I am concerned about councils position on short term rentals. I have been a Realtor in the city for 11 years now and I have seen our market change a few times over those years. Right now we are in a rental crunch and the housing market has done a major up swing which, does add stress on our lower income citizens. I do understand that finding a solution for housing is very important and something that does have to be delt with. I do not however believe going after investors who have bought a property in the transit zoning area along with following the bylaws set by the strata. These people have followed the rules. I do believe that the Greater Victoria area needs to address illegal vacation rentals. Opening up of a basement suite in Saanich would help with student rentals or a whole house to house a local family. These are the issues that need to be addressed not attack investors whom played by your rules and pay the taxes.

I might also add that your solution is short sighted, we have a lot of rentals being built at the moment and this rental crunch is going to end and we are going to be left with vacant properties. Our city needs to come up with a healthy long term plan and not a knee jerk reaction.

I am also someone who loves to travel and my husband and I prefer to stay in a vacation rental condo or home as it lets us travel with family and friends as the cost goes down allowing everyone to afford the trip. The average hotel in Victoria cost over \$150 a night and when you have a large family the cost of getting 3 or more rooms is very expensive. Having vacation rentals does provide a healthy balance of choice for travellers. Our city relays and tourists spending money in and around Victoria, if we take affordable options away from travellers we will see less dollars being spent.

Vacation rentals provide an option for travellers , allow snowbirds to afford living in more then one place, gives options to people who have been displaced by home issues such as major water damage in condos, interim living between purchasing homes, short term living while moving to Victoria, a home to a someone who is getting divorced ... Short term rentals have a place in our city and my family has used them for all these reasons above. My cousins can't afford to stay in Victoria at a hotel with their kids, they book a condo with a kitchen for \$90 a night. My Grandmother was displaced from her condo for 4 months and she stayed in a condo in Humboldt valley giving her a place to land that made her feel at home where a hotel would not have worked, my

personal information

my mom needed a place furnished for 3 months before she could get her own place. Our city needs to look at the bigger picture and find a healthy balance.

personal information

Owner of personal information

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Saturday, Nov 4, 2017 5:09 PM  
**To:** Legislative Services email  
**Subject:** Short term rentals

Dear Victoria City Council

We are writing to convey our concerns with the proposed Short Term Rental business licence and property tax changes.

We are new property owners in Victoria, and purchased such property with the intention of exploring the short term rental market. This investment property is intended on supplementing our retirement income, as well as supplemental income as we support our growing family. We have always found Victoria to be a welcoming and enjoyable city as a couple, and now as a family. We enjoy spending holiday time exploring the city, and wanted to share that experience with others through our Short Term Rental. We have often used Short Term Rental properties for our accommodations, as we find them more suitable, flexible and affordable for our family. We sincerely hope that City Council hears the concerns of Short Term Rental owners, and does not increase business licence and property tax rates, which would in the end impact the not only the owner, but the consumer.

We look forward to continue to enjoy time in Victoria.

personal information

## Rob Gordon

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**From:**  
**Sent:** Friday, Nov 3, 2017 9:34 AM  
**To:** Legislative Services email; Lisa Helps (Mayor); Victoria Mayor and Council; Community Planning email inquiries; Business Licence; Public Hearings; Ben Isitt (Councillor)  
**Subject:** Short term rentals in Victoria BC  
**Attachments:** bottom.letterhead

Hi there

I am emailing you all to let you know that I am deeply concerned about councils position on short term rentals. We purchased downtown at the Era 728 Yates, in the transient zoning purposely for this as a legal short term rental. We wanted a legal suite that wasn't suitable for someone to live in, but would return a decent rate of return as an investment to supplement either of us not having a pension. The suite is 480 sq ft bachelor and not liveable for anyone but a transient person. Also I wanted to mention that a lot of our seniors in town are snowbirds which depend on this income to supplement their livelihood while they are down south or whatever the case. We have a tonne of these people in Victoria as I am sure you know! Go after the illegal short term rentals. We are fine with having a typical \$100 business license to operate this in Victoria. We pay taxes on this income, and it gives tourists another option to come visit our beautiful city at an affordable rate. The hotels are constantly booked solid throughout Victoria especially in the high season. Fair competition is a healthy thing for business and I hope you don't overlook the other side of the coin as we all love this city and want to find a solution.

All the best!

Sincerely

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 11:34 AM  
**To:** Legislative Services email  
**Subject:** Short Term Rentals

Greetings all,

Our heritage condo renovation was completed & sold in early 2000 when city policy was to encourage development of short term rentals to support the tourism industry. Strata bylaws state short term rentals are permitted - part of the live/work units they were sold as. Many owners bought into this concept & utilize their property as occasional short term rentals others long term rentals & although long term rentals generate far more damage & costly problems for the strata owners both have coexisted. Likely our building does not conform to the use provisions of the Local Government Act & this proposed change of policy has generated a new hostile attitude towards us. How else can a business license that can be \$100 but in our case of \$2,500 be viewed? Most of us are single unit owners, not on par with accommodation business lobby groups. The report touts a simple approach to regulating STR's and simple approaches to complex issues appeal to simple minds. This report's recommendations around the broad-based approach to the housing crunch unfairly targets families seeking extra income to address housing affordability. Adding additional government levied costs only drives the final housing costs up in communities as the extra costs are passed onto end users. \$2,500 is an unreasonable licensing fee & is unfair to a large group of people who have engaged in the beginning of a shared community. The pull of going back to housing as it used to be is attractive but the reality of affordable housing means people have to find new ways to make ends meet. A more reasoned, measured solution to the licensing costs of STR is what the community of people living in Victoria need & the recommendations of the report to Council fall well short.

Regards,

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 4:28 PM  
**To:** Victoria Mayor and Council; Legislative Services email  
**Subject:** Short Term Vacation Rentals - comments re your proposed changes

To the attention of Mayor Helps and the City Council,

I am writing to ask you to seriously reconsider the draconian changes you have recently proposed to make life harder for those of us working very diligently to provide wonderful short-term rental accommodation for guests to Victoria from Canada and around the world.

My husband and I, both in our sixties, took the calculated risk earlier this year to drain our home equity to allow us to get an expensive, small, short-term vacation rental unit in Chinatown, which will one day hopefully help us in a decade or so, as we have no pension plans. Since opening, we have poured hundreds of hours of our time and hard work (& 1000s of dollars) into ensuring our guests have a wonderful stay here in Victoria. Being honest, ethical people, we purposely chose an area that the City's website assured us allowed short-term vacation rentals as a permitted use, ensured that the building itself allowed them in the bylaws, and immediately purchased a business license before opening. Our very personal attention to our guests, our top notch furnishings, and the prime tourist location where our unit is situated have led to us having all 5-star reviews since day 1. Our guests have spent many, many thousands of dollars on restaurants, sightseeing, festivals, shopping, etc., and have all told us they would love to come back again to Victoria as they had such a great time in our centrally-located rental unit, and that they would tell their friends both about Victoria and about our accommodation. This is, I'm sure, precisely what you as the current leaders of this city would like to have happen!

Would those guests have stayed in hotels if it hadn't been for us? Perhaps a few, but many people want a personalized 'home-away-from-home' experience rather than a standardized hotel chain experience. Those staying longer or travelling continually greatly appreciate a washer/dryer for their clothes, and a kitchen, and a personal connection with residents like us. And then there is the financial reality that stops many people from coming to visit expensive cities like Victoria—the hotels are just too expensive for many, allowing little money left in the budget for sightseeing or eating out. Without alternative options like ours, many prospective tourists here would go elsewhere (Parksville, San Juan Islands, etc). This summer when I had an acquaintance from personal information visiting and our rental unit was not available, as most of the affordable hotels were full and those with available rooms were charging \$350-\$450 a night (!), he & his brother went and stayed in Campbell River instead! The only night he got to stay in Victoria was when I found him a nice Airbnb unit that was good value. Both hotels and Airbnbs get filled in high season especially—there are enough guests wanting to stay in Victoria that there is enough business for both hotels and rental owners to meet the need. Closing our services down will have unforeseen consequences on many local businesses who rely on the guests staying with rental owners such as ourselves.

Most people I've spoken with who are knowledgeable about short-term vacation rental units are shocked and perplexed why you as City Council would decide that those of us providing these services legally should be the only group targetted in the City for an approximately **2,174% increase** in the cost of a business license!! We have one little 539 sq ft one-bedroom unit—do the hotels pay \$2,500 per room?! Apart from important issues of fairness, I think that such a move would simply push people (out of financial necessity) into running their units secretly without business licenses, advertising on less well-known sites, as they can't afford to do otherwise. If you keep the business license at a reasonable amount for all short-term vacation rental units, such

as even the \$200 (already a huge jump from \$115) you proposed for home-based rentals, the vast majority of us will pay it, post our business license numbers on our web ads, etc and will continue to do everything legally.

We are also perplexed why you think you should discriminate against those of us renting let's say a one-bedroom unit where allowed downtown, charging us \$2,500, when someone renting a one- or two-bedroom suite in their house should pay \$200?? \$200 is more than an adequate amount for either group to pay, and we are both providing the exact same service, so why the discrimination? And in practice, it is much safer for hosts to not have total strangers sleeping in the bedroom next to their children, but to have dedicated apartment space where both hosts and guests can feel safe.

I realize that the issue of affordable housing is of concern to you and to all city councils across the world. These proposals were probably made in the hopes of freeing up more units for long-term housing. Unfortunately however, as with most complex issues in life, what seems like simple solutions often do not work out in actuality as hoped. As a realtor myself, the hard reality is: prices are largely based on "location, location, location". Units in the heart of the touristy areas of downtown—where most Airbnbs are located—will NEVER be "affordable housing! Units that cost owners \$400,000 - \$700,000 will NEVER be rented out for \$1,000 a month or less to those needing affordable housing—when the monthly costs of mortgage, condo fees, property taxes and insurance are on average between \$2000 - \$3000 a month for owners! And if we sell them, only wealthy people will be able to buy them. So even if you were to close down every downtown Airbnb, you would probably have almost zero additional "affordable housing". You need to look at other more effective means of providing affordable housing, rather than unrealistically expecting that we are personally going to subsidize other people's housing for units that we have paid a great deal for. The hard reality is actually, that as in every major city of the world, those with low-income jobs need to realistically live in less desirable, less central areas. Many of us would love to live in Oak Bay or the Uplands, but know that our income does not allow it. This is likewise the situation for downtown, where countless people would like to live.

I have many more comments—including about how you passed major zoning changes with no real public consultation except for one non-advertized meeting--but as I think your deadline is in 5 minutes, I need to close.

Thank you for considering these comments and those from the 100s who attended Monday's Open house, and we trust that you will do the fair thing in revising your proposed changes to be more fair and reasonable.

Sincerely,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 11:38 AM  
**To:** Legislative Services email  
**Subject:** Short-term rentals

Hi there!

I was at the meeting on Monday at City Hall. It was impressive in that it was very well organized thank you for being on your collective game!

My husband & I own a suite in The Oriental (562 Yates St) and currently have an application in with your offices for a business license to continue operating our Airbnb business, which we started on July 1st, 2015. I understand that there is a very good chance that we will be allowed to continue pending a few additional pieces of information which we will be forwarding immediately.

We just want to table a couple of things about the proposed business license fees. While at first we balked at the proposed \$1500/year fee, upon further consideration we feel that a weightier fee might be good to weed out the operators who are not serious about their rental business. At the same time, if we are to pay more than the \$100/year business license that everyone else pays to operate in Victoria, we do want to ensure that this fee or at least a good portion of it finances public housing in some fashion (ie: creating more low income long term rentals, etc.).

We also want to add our voices to the alternate concept of a rental taxation rate rather than a hefty yearly fee that we can perhaps build into our fees as traditional hotels do. But again, we believe that ALL listings should be licensed and approved by the city. If we owners want to operate as businesses, then we should be prepared to legitimize.

Thank you!

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 5:16 PM  
**To:** Legislative Services email  
**Subject:** Short-term rentals

Dear Mayor & Council,

I am excited to call Victoria my new home away from home as I reside in Vancouver but now spend part of my time in your wonderful city. I like to plan out my future well in advance. My partner and I are keen to move to the island eventually and as part of this transition I was lucky enough to be one of the original purchasers of a Janion micro-loft back in 2013. This amazing project not only brought a beautiful building back to life, but also was strategically zoned for short-term rentals and was established many decades ago. This was critical for me, as I knew I would not be in Victoria full-time, but would offer me a vacation spot, as well as a place for my family to stay which would encourage them to come down island more often.

Instead of have it sit vacant most of the year, we could make it a viable situation by utilizing Airbnb while no one is there and help drive the booming tourism industry and pay our bills. Unfortunately the extremely aggressive attack on VRs is going to drive us to leave our suite vacant for 90% of the time as I am not willing to give up my planned vacation spot by renting it out long-term. Not only will I be losing money, the Victoria economy will be losing money directly as my staff that help me manage the property will also be out of work.

This plan seems to be an extreme measure designed to appease the big corporations who dominate the tourism accommodation sector in Victoria and I do not personally think it is in the best interest of residents or the city. I support regulation if done right and is able to strike logical balance, this proposed change unfortunately does not, it is effectively a ban.

Below is a letter from my Strata council which shares the sentiment from our Janion Community.

Thanks for your time,

personal information

Dear Mayor & Councillors,

We are writing to object to the recent downzoning of The Hotel Janion Building in Old Town,

Victoria and specifically, to proposed new regulations now being contemplated that will apply to Janion Owners who operate under the now grandfathered Transient Accommodation zoning.

In 2013, Janion owners purchased their units with the understanding that the 120 micro-loft units were zoned for residential AND vacation rental use. The design of the building itself was conceived specifically with Transient Accommodation use in mind and the average size of the units is below 300 square feet.

Since completion in December 2016, the building has been operating very successfully with a mix of full-time residents who rent or own their suites, part-time residents who operate their suites as VR accommodation when they are not in Victoria and a small number of suites that are operated as VR accommodation on a full-time basis.

Many Janion owners, including full-time residents, rely on income from vacation rental in order to pay their mortgages and meet other financial obligations. Owners purchased their Janion units in good faith, relying on zoning that had been in place since 1994. Buyers at the Janion were cognizant of the zoning and of neighbouring buildings with mixed condominium and transient uses such as the Victoria Regent and Delta Hotel and had no reason to suspect that the zoning was under threat of the downzoning that has taken place.

Provisions in the Local Government Act provide that the use is grandfathered, but it appears that the city is now going to use unreasonable annual licensing fees and bureaucracy to force an end to the VR use of our building. It is our understanding that each of our owners who wishes to obtain a business license will require a letter of approval from the Strata Council.

Please consider this letter as your official notification that the Strata Council approves of Transient Accommodation use of any of the Janion's 120 units and that no strata bylaws are being contemplated to forbid the use, which is widely supported in this building.

Transient Accommodation under Victoria's current Fees Bylaw is \$100.00 plus \$5.00 per room. We find that the proposed fee of \$2500.00 a year for a Business License is patently unfair, discriminatory and unreasonable and we ask that you reconsider taking a punitive approach.

The proceeds of licensing paid by owners operating legally should not be used to enforce against operators who have always been operating outside of zoning. One can only conclude that the exorbitant fee is another direct attack on our owners. We respectfully request that you reconsider.

Yours truly,  
Ken Hancock  
President EPS #3614  
Janion Strata Council

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personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 3:50 PM  
**To:** Legislative Services email  
**Subject:** Short Term Rentals

To whom it may concern,

I attended the Open House regarding proposed changes to the Short Term Rental Regulations. I would appreciate you adding this additional comment to your consultation process.

I understand the reasons for change in regulation, however the plan seems to focus on the individuals who run short term rentals on a high volume, multiple unit and high revenue basis. In such situations I can accept the need for expensive licensing. However, I feel there should be some flexibility for people who have secondary property and rent such out purely for cost recovery and primarily use the unit for their own enjoyment. We have been frequent visitors to this beautiful City and recently purchased our own unit. Our intent is to provide short term rentals on a minimal basis to recover our taxes, utilities and other associated costs. If I understand your proposal correctly, I will now be faced with a \$2500 license requirement. I feel that one cost for all owners, no matter what the size of the business, is unacceptable. Such will probably result in us not renting out the property, hence more accommodation availability issues for tourists. Already a challenging issue for the City.

As such, I would appreciate a licensing system that incorporates tiers or thresholds that are relative to rental durations or gross revenue levels.

Thank you for your consideration.

personal information

Sent from my iPad



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 3:36 PM  
**To:** Legislative Services email  
**Subject:** Short term rentals

As a single parent, this kind of Short term rental helps me save for property taxes.  
Implying that I need a business license is simply a money grab. Or maybe to fund the ridiculous bike lanes you putting in.  
I am against this proposal !

personal  
information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:58 AM  
**To:** Legislative Services email  
**Subject:** Short Term Rentals

Nov 1

City of Victoria

Re: Short Term Rentals

To Whom It May Concern,

Hosting guests from around the world in my home is important to my guests and to my livelihood.

My entire home rents to families, groups of people and business travellers.

It is very rewarding to provide a safe environment for families to gather, children, Mothers, fathers, grandparents, use my home as a place of uniting and sharing the family experience.

Sharing the neighbourhood is a wonderful way for guests to understand the environment that they would not experience staying at a local hotel. Its economical and allows people to be a part of the community for a short while.

The tourists staying spend money. Tourism is the life breath of our economy.

Hard to believe that there is a problem here.

I would very much like to hear what the downside of all this is, why are you opposed or even considering limiting this shared economy.

I will vigorously defend my right to provide accommodation to guest visiting our area.

personal information

**Rob Gordon**

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**From:** personal information  
**Sent:** Saturday, Nov 4, 2017 5:09 PM  
**To:** Legislative Services email  
**Subject:** Short term rentals

Dear Victoria City Council

We are writing to convey our concerns with the proposed Short Term Rental business licence and property tax changes.

We are new property owners in Victoria, and purchased such property with the intention of exploring the short term rental market. This investment property is intended on supplementing our retirement income, as well as supplemental income as we support our growing family. We have always found Victoria to be a welcoming and enjoyable city as a couple, and now as a family. We enjoy spending holiday time exploring the city, and wanted to share that experience with others through our Short Term Rental. We have often used Short Term Rental properties for our accommodations, as we find them more suitable, flexible and affordable for our family. We sincerely hope that City Council hears the concerns of Short Term Rental owners, and does not increase business licence and property tax rates, which would in the end impact the not only the owner, but the consumer.

We look forward to continue to enjoy time in Victoria.

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:59 AM  
**To:** Legislative Services email  
**Subject:** STR proposal to ban

It seem to me it's very ironic that the stated goals on why your doing this takes away the very same tool that we used to solve those issues, and finally start a family. You can imagine how that makes us feel the position it puts us in.

Have a good day

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 10:17 PM  
**To:** Legislative Services email  
**Subject:** STR Regulations

My name personal information My wife and I purchased a property last year as a investment since a single family home was way too expensive.

My wife is a stay at home mom and she manages the condo through the AIRBNB app. This job has been proven to be a perfect chance for my wife to still be available for the family, but still giving her an opportunity to "contribute" to society again after almost 8 years of personal information

We were at the council meeting when it was decided that STR ruling would be changed. However we thought that the way the proposed changes were set out in an unfair way. We both understand that there are illegal units being rented out through the vacation rental websites and we are all for stopping those outside of the Transient Zoned areas as we did pay a premium on our unit in the Falls to acquire a properly zoned condo.

Also, a potential \$2500 license is steep considering that number what drastically dip into the potential profits we hope for. Why is it that businesses such as car dealerships and stores like Best Buy that generate millions in revenue are only subject to \$100 licenses and the Empress Hotel having multiple outlets being charged close to the \$2500 in annual fees, but they have hundreds of rooms to generate revenue.

I can tell you that I remit GST to the federal government on my unit and am happy to do so as it is my duty as a citizen of Canada. I am also happy to have the resort taxes and other fees applicable to be remitted. But again I thought that those fees were to assist The city in promoting itself to tourism, and if that is the case should STR's be marketed as such to be fair?

We believe in regulating this sector and we also agree on shutting down illegal suites, but the comments of certain councillors and members of the public stating that we need more units back on the rental market are looking down the wrong street. We hope you can see that if units can no longer operate profitably, those units WILL end up on the rental market but not at an affordable \$1100 per month. Owners will likely have rents of \$1700+ as those suites are located in the more upscale building in town and will likely be rented out fully furnished.

Should restrictions be placed by way of heavy fees the City is likely to see many units being put up for sale and then having to deal with available suites but not for rental but on the MLS listing with people who now have to deal with stricter and tighter lending rules for mortgages. Again, empty suites as not many people will be able to qualify for the mortgages. The people looking for affordable housing in downtown Victoria will still be looking. This is also not even mentioning the people who rely on the STR business to pay their mortgages. Foreclosure might be a word too early to mention but could easily be on the horizon.

Sent from my iPhone

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 11:41 AM  
**To:** Legislative Services email  
**Subject:** STR

Dear Folks:

You have asked for feedback on the proposed report and regulations regarding Short Term Rentals in Victoria (STR). I am happy to give you my feedback.

First I want to state who I am and what my interest is in STRs. My wife and I own a condo personal information Yates Street. We are a retired couple who currently reside in Burnaby. We have been attempting to move to Victoria on a permanent basis but needed to wait out our youngest son getting on his feet. We used to visit Victoria often and we spent a lot of time looking at real estate. Over the years the prices continued to rise and so we decided to buy the condo on Yates.

We like to try to visit for a week every month and the rest of the time we advertise our property as a STR via HomeAway (VRBO) and TripAdvisor. The ability to rent out to tourists allows us the ability to visit Victoria and soon to find a new home for ourselves in the city.

We don't seem to fit your two standards of license, this is not a permanent home yet, nor are we commercial. The cost of the license is punishment not a permit to operate a part time STR. What other businesses pay \$2500 annually to operate a part time, or for that matter, a full time business?

When we purchase our condo it was clear that the city was encouraging STR development in this building and that was a consideration to purchase at that time (2008) and now the city seems to want to 'kick' us in the teeth. How is this fair and to what purpose? I will not rent on a long term basis as we need it for our own use and only rent STR to defray our expenses, hardly a money maker, it is similar to folks who look for homes with a suite for a revenue helper - to make it affordable.

The \$2500 fee will take about 50% of our annual 'profit' from our renting. You have become a partner. What value to do you bring to the table?

Please reconsider this. There needs to be a middle ground.

Sincerely,

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 4:28 PM  
**To:** Legislative Services email  
**Subject:** Vacation rentals

Hi ,

My wife and I recently purchased a small studio condo, at 599 Pandora Ave. We live in, and work from this studio. Our purpose for purchasing this condo is to have it as a primary residence, and rent it short term while we visit family from time to time. These family visits will be anywhere from two weeks, up to to months. The frequency of our family visits will likely increase as we step further away from working.

We will apply for appropriate licences, and of course, pay appropriate taxes, as we will have our condo managed by a reputable STR company, that has been in business for many years in Victoria. Our concern is that with the new proposed city bylaws, the building at 599 Pandora Ave, is not being grandfathered as legal non conforming, allowing STR's.

Prior to us purchasing this new condo, we had been living in a larger suite in 599 Pandora. The building was probably the leader in the STR industry in Victoria. At one time there were 22 suites(owned by the developers family) operating as STR's, along with several others. As a matter of fact, we learned to really embrace the industry, to the point persona

This industry has become part of our informat  
semi retirement income.

I guess the purpose of my letter is to show that we are an example of a proposed STR, that makes sense for everyone, and doesn't negatively affect housing in Victoria.

We look forward to applying for our licence, but will likely wait until one of our owners has acquired the legal nonconforming status for the building.

Thanks for listening, regards , personal information Sent from my iPad

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 3:21 PM  
**To:** Legislative Services email  
**Subject:** When tenants are short term

Missing from the short term rental discussion is the fact that hotels do not meet the needs of short term tenants. That is a matter of cost, location and space requirements. The City's focus on an artificial "transient zone" may suit hotel owners—but it does not factor in the needs of short term tenants or the landlords who serve them.

From experience, 60-65% of STR tenants in neighbourhoods need accommodation for very specific purposes in proximity to that purpose. They often bring caregivers, or pets, or family members who cannot be left behind. They need accommodation in neighbourhoods and have as much right to that as any other citizen.

Typical stays support pre and post medical treatment prep/recovery. For example:

- A mother and daughter from Campbell River stayed to gain control of nerves before an operation at nearby RJH. Doctors had advised against the long drive home so post surgery, they have a peaceful respite—the stay totalled 12 nights.
- A less invasive medical treatment brought an artist from the Comox Valley with her mother. Their two stays of 4 nights served a similar purpose for consultation and a second post-op check-up.
- An open fridge for medications and place to prepare meals is critical, as is space that can place the patient in a quiet room with a caregiver nearby but in a separate space is important.
  - This type of tenancy is not compatible with room sharing in someone's private living space where the lack of privacy and sense of imposition adds stress, often embarrassment.
  - Comparable space in a hotel runs upwards of several hundred dollars/night, a serious burden to most (all?) and adds insult to injury when imposed by the City.

Other needs for short term tenancy include the following true examples:

- personal information respectively used the same property for their stay in Victoria—initially under 30 days, extended to two months while here.
  - Each prof needed proximity to UVIC and sufficient desk/table space for separate but related work, and each required a bedroom.Their budget could not permit a hotel stay and shared living space was out of the question for these tenants.
- personal information . Short term tenancy in a neighbourhood whole unit means that they can approximate a family life—last time, a fiancée accompanied the dad whose stay in a "family space", picnics in the garden, private space for the couple and daughter, made meeting a new future step-mum successful. The little girl thinks of the house as "her time at dad's house" and we are holding her travel bag with toys and personal belongings in anticipation of next year's stay.
  - The City's proposal that this reunion take place in one or two bedrooms in some stranger's personal dwelling is ridiculous.
  - Knowing of children of divorced parents whose visits are painful stays in cramped hotel rooms—I that short term tenancy makes all the difference. The City proposal is heartless.
- personal information came expressly because they could find a short term tenancy that offered good separation of spaces that could accommodate such a larger group comfortably, conscious of weird jet lag and age related sleeping habits.
  - Shared personal space as required by the City cannot comfortably accommodate such a large, multigenerational group.
  - Comparable hotel space (easily 600-850/night for several rooms) would have meant not coming—I asked. Victoria would simply lose out.



- Families from Mexico, Korea, Japan, China and India, as well as Ontario, Northwest Territories and the Okanagan have accompanied children from age 6 to university age for language study or to settle into Victoria schools. Depending on the size and configuration of the family, they may choose a one bedroom with pull-out or a two-bedroom with pull-out and room for air mattresses. In all cases, they seek a kitchen for preparation of familiar foods, and often seek a specific configuration to support multi-generational needs. Stay are typically 5 - 14 days to settle children into a new experience in a new country, or a week or so where it is a BC family setting kids into residence or a rental.
  - Shared space in someone's "dwelling" simply cannot meet the needs of these short term tenants. If forced into hotels to place kids at university, Victoria would simply lose the business of a longer stay. Or, as in the case of Ontario STR tenants where the family stayed while the daughter studied at UVIC, they would not have come, or selected the course offered in a more welcoming Maritime university where a similar content was available—I asked.
  - Already hard-pressed by foreign student fees, travel costs, etc., hotel rooms are simply not an option. There are plenty of places to study English—Victoria would lose the business.

35-40% of STR tenants are "neighbourhood explorers" in Victoria for 3-60 days. These people do not want to stay near the Inner Harbour. They do not want the noise and bustle. They want to experience "local living". They tend to stay longer or come back often. They patronize very local shops, coffee spots, restaurants, community markets and fairs as part of feeling like a Victorian. They visit most of the usual tourist attractions, too, but choose not to stay in a tourist zone where every step reminds them they do not belong. They interact with their STR landlords as part of cultural exchange through food, sometimes music, always conversation. These people see STR owners as ambassadors and they chose destinations that enable the experience they want.

STR renters seek out personal information about the owner, looking for similarities in interests, in demographic (are they old/young like us? do they fit some other category that indicates acceptance of diversity? will we be safe and able to access the owners for local tips without sacrificing the privacy we need?). The usual websites are used by long and short term tenants now, so for some guests, it is a lease under the Residential Tenancy Act. For others, the reservation booking that comes with \$1 million in insurance per night.

On the flip side, STR tenants meet critical needs for Victoria taxpayers who find costs of maintaining property rising every year — an especially serious situation for those older Victorians who must count on the suite in their home or the still mortgaged second house bought as a hedge against old age. If your pension is not indexed—or if you are self-employed and bought a property for old age, STR is critical in getting to a lower mortgage so that you can have any personal income at all.

A long term suites can have features that make renting difficult (e.g. stairs). So, STR offsets mortgage and operational costs until the next long term tenant. That's just necessary to pay bills between long term tenants. And, some long term tenants benefit from STR units that offset costs such that rents do not increase every year.

Members of Council are spending tax dollars in order to harm taxpayers. And, they are breaking a bond of trust without understanding of the realities faced by both STR tenants and owners throughout the City.

Please reconsider and support your constituents who are small owners whose STR brings business to Victoria neighbourhoods while enabling young families to protect the greatest investment they will make and seniors to retain independence in their remaining years.

It should be quite possible to distinguish between the small owner and the corporate entity coupling up tens of condos, and it is high time neighbourhoods got fair treatment to benefit residents and tenants—long and short term.

Sincerely,  
personal information

Taxpayer  
Victoria, BC

## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 9:21 AM  
**To:** Legislative Services email  
**Subject:** Why home sharing is important

I understand the City of Victoria is gathering information on why home sharing on sites such as airbnb is important. With the cost of living (whether you are renting or owning a home) sky rocketing in Victoria beyond what many families can afford, I personally could not keep my housing without renting my second bed room. I am was a single parent and personal information which is far more affordable for her. It's important to both of us that I maintain a bedroom for her because she comes home for the summers and Christmas. Therefore having a roommate is not an option for me because I need to keep a room for my daughter. Being able to rent out my secondary room furnished helps me to pay my rent. I could not have a room for my daughter on my income without being able to share my home with people looking for short term accommodation.

Thank you.

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 9:28 AM  
**To:** Legislative Services email  
**Subject:** STRs

I live in Los Angeles, CA, and visit Victoria about five times a year.

personal information

When I'm not visiting my Victoria condo, I rent it short-term, mostly on Airbnb.

It is not suitable to rent long-term, as I visit frequently.

I get small groups of students, snowbirds from Saskatchewan, families with kids, all kinds of people for whom a formal hotel is not suitable. If STRs were banned, it would sit empty.

I have cleaners and managers who would suffer, as I pay them \$150 per turnover.

And deeming these rentals "commercial use" is crazy. It's not commercial use when I rent it for 31 days, but is when I rent for 29 days? In both cases it's my personal property and my home.

Don't rush into this STR business without hearing from all affected.

The hotel industry saw what Uber did to Taxis and are fighting tooth and nail to ban them, citing "affordable housing" as the argument. Well, let's build more!

I urge you to move SLOWLY and LISTEN.

personal  
information

## Rob Gordon

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**From:** personal information  
**Sent:** Thursday, Nov 2, 2017 11:00 PM  
**To:** Legislative Services email  
**Subject:** STVR

Dear Sir,

I am sure you have received many letters of concern regarding your proposed plans to legislate changes to the STVR existence so I will make it short.

I feel you totally misunderstand the situation of many downtown condo owners and are punishing us unjustly. We purchased our 300 square foot condo as a way to afford our retirement. We live up Island and my husband works in sales which requires him drive to Victoria periodically for his work. This condo seemed the answer to all our problems. He would have a place to stay while working and we could rent it out during the other times to help pay the mortgage. Our profit margins are slight but it affords us the opportunity to pay for our retirement if all goes well. We only rent part time and you want to charge us a full time rate that is higher than hotels.

I don't understand why we have to pay to police ourselves when nobody else has to. Some simple education would do just as well. We are not sucking money out of the community and stashing it in overseas accounts. We live on the Island, spend on the island and provide services for the Island. There are many strong beliefs that City Council is supporting the hotel industry who sends much of their profits out of the country.

Please understand that many of us are the little guys just trying to get ahead and work with us instead of punishing us. Thank you

personal information

## Rob Gordon

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**From:** personal information  
**Sent:** Friday, Nov 3, 2017 11:40 AM  
**To:** Nancy Johnston  
**Cc:** Legislative Services email  
**Subject:** Submitting letter regarding proposed short term rental changes  
**Attachments:** letter regarding proposed short term rental changes.docx

Dear Nancy,

I would like to thank you for your time, I felt you listened and cared about my concerns and solutions. I am not sure how to format my letter so have sent it as the body of this email and as an attachment.

I think the proposed changes are too restrictive and believe my business model enhances all stakeholders' desires and values.

I offer affordable accommodation options to both students and tourists, through offering accommodation to students from Sept through May and BnB the other 3 months. I have also become an affordable alternative for my neighbour's visitors as their own homes are full. This enables me to keep rents reasonable for long term tenants and provides a way to save for capital cost like windows and roof.

I am a great ambassador for the city, I grew up in Victoria. I pay \$20.00 per hour for cleaning, above the living wage in hopes of putting pressure on larger industry counterparts which my understanding pay \$12.00 - \$13.00 per hour.

I believe small businesses create the character of our city and are more apt to support living wages and ecological foot prints. I support this by purchasing locally made and or grown supplies for guests, which also highlights the locally diversity for them.

Providing a BnB 3 mths per year had gratefully subsidized increasing expenses\* and has enabled me to save for capital costs like windows and roofs. I am of the understanding the cost to replace my roof today is aprox. \$30,000.00, which means I have to save for it.

The friend who introduced me to this Bnb concept of 3 months and 9 months is 75 years old and truly fears speaking up. She like me and most people I have met in this business live in multi unit homes because of affordability; unfortunately never felt able to support the mortgage and maintenance of a

single family dwelling.

I would like to suggest that a resident would have to prove two items to qualify for a 3 month license. They are a resident of Victoria and they have a tenancy agreement longer than 5 months in any given year. This will help ease rentals for students, accommodation cost for tourist, have we not all had a budget, and keep homes in good repair.

\*

Expense	In 2004	In 2016	% increase
Taxes	2,589.13	5780.46	123%
Water	531.39	1808.88	240%
Insurance	1294.00	3030.70	134%

Thank you for your time and consideration,  
personal information

**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 5:43 PM  
**To:** Legislative Services email  
**Subject:** The Benefits of Airbnb

My husband and I have operated Airbnb from our home for close to five years in the City of Langford. We occupy the home ourselves and have two areas that we rent out on a nightly (two night minimum) basis through the Airbnb Website.

My husband and I are empty nesters; our children left to pursue their own education & careers after completing High School. We found the house empty and too big for just the two of us. As we enjoy travelling ourselves and we really enjoy meeting people from different parts of the world, we found it easy and natural to “open our house” to guests.

When you listen to the News on Victoria TV or the Paper, all you hear is about this awful “Airbnb Short Term Rentals” as if the people who are renting out properties are somehow heartless souls that are “exploiting the tourist industry by renting out a bare bones room for a high rental rate thus taking away revenue from the business tax base” OR “unfeeling about the people who are looking for long term rentals at an affordable price; we are exploiting short term rentals to maximize our own revenue”. That may be true of land owners who buy homes for the commercial reason of operating Airbnb,

Not all Airbnb Hosts are Landlords who are in the Business Just to Earn Money — They are Super Hosts

*Many Airbnb Hosts are simply very caring/sharing, proud citizens of the City of Victoria who have the capacity to give up a “piece of their own privacy” and welcome strangers into their home [we do not discriminate based on religion, nationality, ethnic, or sexual orientation].*

*We give Airbnb Guests who :*

*(1) Cannot afford to stay in hotels in the Victoria area at the high nightly rates charged during the high seasons. There are a lot of young adults that are travelling the world and they have to watch what they spend. There is also a lot of older people on fixed incomes who cannot afford the prices either.*

*(2) Are wanting to get to know Canadians and Canadian life/values. They cannot get that when they book a hotel room and then spend the evening alone in that room.*

*(3) Are staying in Victoria/Langford for another reason other than visiting. If they are here to seek medical treatment - they want a home base. If they are here to visit family who do not have enough room for them to stay - they want a home base. If they are here alone or are young - they want a couple who are older so that they can have a ‘friend’ to come home to.*

*We have had about 200 people visit us in our Langford home over the past five years. We have put ourselves into welcoming every one of them to our home, to our community, to our City. We have represented VICTORIA and its tourist sites; its visitor attractions; its restaurants; its festivals; its universities; its culture with pride and openness.*

*We have people that have become good friends and we still visit & communicate with. We have responded to the struggles of some of our guests by reducing our nightly rate or giving of ourselves. We know that the financial gain is secondary to the blessings that we are getting by creating an “Openness in our Own Home”.*

*I simply do not understand how the City of Victoria Council who support tourism; who support the rights of the individual; who support an open society; who support inclusiveness; who encourage the entrepreneurial spirit (we supplement our income); who love to hear praise of how welcoming we are —  
would not be proud and encouraging of house occupied Airbnb Hosts.*

personal information



## Rob Gordon

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**From:** personal information  
**Sent:** Wednesday, Nov 1, 2017 1:19 PM  
**To:** Legislative Services email

I believe downtown Victoria is no longer attractive to tourists. People opening their homes presents a more pleasant picture of out town...ie fewer drug addicts, mentally challenged, and other homeless.

It makes it a more affordable for people who might otherwise not be able to afford to travel to a city such as Victoria.

It helps the home owners with the ever increasing costs of maintaining a home in Victoria.

Regards

personal information

November 14, 2017

Dear Mayor and Council  
City of Victoria

**Re. Importance of following through on the proposed Short-Term Vacation Rental Regulatory Framework**

Dear Mayor and Council,

Further to my address to Council on November 9, please accept this written submission outlining why it is vital for Council to follow through on its proposed Short-Term Vacation Rental (STVR) Regulatory Framework.

Council has already engaged in extensive stakeholder consultation and taken time to carefully consider this issue. On September 21, at Committee of the Whole, Council settled on an elegant and effective approach that required STVR hosts to obtain a business licence and permission from their strata or landlord.

This is a very strong model that would serve to reduce tension and friction between residents and visitors where housing stock is being used for commercial accommodation.

It is also a timely solution to an issue that urgently needs to be addressed. If the responsible jurisdiction does not enact and enforce regulations as planned, our available housing stock will continue to be swamped by very efficient short-term rental platforms. In contemplating your decision regarding the regulatory framework, we ask you to consider the following:

**Context**

Research repeatedly demonstrates that STVRs are creating housing shortages, driving up rental rates, inflating residential real estate prices, and undermining development in the mainstream, tax-contributing tourism and hospitality sector.<sup>1</sup>

Most recently, a comprehensive study by McGill University's School of Urban Planning<sup>2</sup> confirmed that alarming growth in conversion of housing stock to "de-facto hotels" via platforms such as Airbnb is not only undermining accessibility and affordability of housing in Montreal, Toronto, and Vancouver but also changing neighbourhoods in negative ways.

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<sup>1</sup> See CBRE Ltd, 13 September 2017. *An Overview of Airbnb and the Hotel Sector in Canada – Final Report*.

(<http://www.hotelassociation.ca/pdf/An%20Overview%20of%20Airbnb%20and%20the%20Hotel%20Sector%20in%20Canada/Full%20Report.pdf>)

<sup>2</sup> Wachsmuth, D. et al., (2017) *Short-term Cities: Airbnb's Impact on Canadian Housing Markets*. Available at <http://upgo.lab.mcgill.ca/airbnb>

The research highlighted the especially adverse impacts of single hosts with multiple STVR listings and proposed three regulatory principles:

1. One rental per host (to prevent commercial operators and property managers converting multiple properties to STVRs)
2. No full-time, entire-home STVRs (home-sharing should not be a full-time business)
3. Platforms must be responsible for compliance (listing platforms should ensure regulations are enforced).

### **Non-Traditional Stays**

Those opposed to regulating short-term rentals claim that the proposed regulations will prevent temporary stays such as locum placements or academic exchanges. This is simply not true. The provincial government makes a clear distinction between short-term and long-term rentals when it comes to PST and MRDT. After 30 days, a stay is exempt from PST and MRDT.

The City of Victoria's framework proposed the same 30-day distinction between short-term and long-term rentals. Therefore, if a landlord is focused on executive stays, locums, or academic exchanges — as many legitimate companies are — the 30 day definition is clear and it works. There is no need to water it down or amend the framework.

Tourism Victoria strongly supports the work Council has done on the regulatory framework, and we urge you to be wary about groups lobbying to divert attention, mislead or confuse. We have heard confusing and inaccurate commentary from these groups about enforcement, as well as statements about taxation that parse the intent of the rules and muddy the picture.

City staff put together a very robust framework to support a housing-first principle. Weakening the regulatory scheme or cutting corners on enforcement will result in lost housing opportunities for residents.

### **Social License**

The tourism industry relies on social license and, therefore, we urge the City to do everything within its means to prevent short-term vacation rentals from undermining the quality of life citizens are entitled to expect and enjoy in strata buildings and residential neighbourhoods. Council has made the right decision by requiring the approval of landlords or strata corporations before issuing a licence for a short-term rental.

Changing or qualifying this decision could create ill-will between residents and the tourism industry, as has happened in other destinations such as Barcelona and Venice as well as Banff, Lake Louise and Niagara Falls.

## Housing

Perhaps most importantly, council's decision was seen as a win in the fight against lack of affordable workforce housing options in our city. All industries need to be able to attract and keep quality employees. With Greater Victoria experiencing a profound housing crunch, the City of Victoria earned commendation for council's decision to curb short-term rentals. All evidence points to this being the right thing to do.

A recent article in *Harvard Business Review*<sup>3</sup> describes how Airbnb has undermined housing availability as well as social license in Paris, Lisbon, San Francisco, Reykjavik, and Joshua Tree, generating persistent socio-economic problems. Research reported by Skift<sup>4</sup> (the world's largest travel industry insights platform) confirms that focusing too much on quantity-tourism, driven by Airbnb's business model and strategy, has fueled a broad range of housing and social problems within communities, compromising quality of life for residents.

There are reports of STVRs undermining housing availability for workers in Whistler and Toronto<sup>5</sup>, and the problem is increasingly evident in Vancouver and the Lower Mainland as well as Victoria.

## Mega Hosts

Airbnb and similar STVR platforms claim to focus on hosts renting a spare room in their house. This is increasingly not the case. Analysis of Airbnb's Mega Hosts<sup>6</sup> — hosts with many listings, often more than 100 — confirms Airbnb is working strategically towards becoming a large-scale travel booking platform akin to Expedia.

Airbnb and its Mega Hosts collaborate very closely to build commercial opportunities. Airbnb has dedicated teams that work with property managers and cleaning services to bring large-scale hosts onto the platform.

Airbnb offers management tools<sup>7</sup> to help these hosts coordinate and rent large numbers of properties while synchronizing with Airbnb's systems<sup>8</sup>. Airbnb provides coaching and management support for these large hosts. In turn, the Mega Hosts profit from Airbnb's unfair competitive advantage arising from lack of regulation and taxation.

Airbnb's very deliberate strategic alignment with large-scale commercial hosts and property managers is a real and growing concern that works directly against housing availability.

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<sup>3</sup> Slee, T. (2016) Airbnb Is Facing an Existential Expansion Problem.

Available at <https://hbr.org/2016/07/airbnb-is-facing-an-existential-expansion-problem>.

<sup>4</sup> Whyte, P. (2017) Amsterdam, Airbnb and the Very Real Problem of Overtourism.

<sup>5</sup> See <http://www.cbc.ca/news/canada/british-columbia/whistler-rentals-airbnb-housing-1.4149027> and <http://www.cbc.ca/news/canada/toronto/city-hall-air-bnb-rules-1.4155938>.

<sup>6</sup> O'Neill, S. (2017) *Airbnb Reverses Strategy in Return to Affiliate Partnerships With Big Players*. Available at: <https://skift.com/2017/10/17/airbnb-reverses-strategy-in-return-to-affiliate-partnerships-with-big-players>.

<sup>7</sup> Skift Article 171016 - Airbnb Debuts New Tools for a Bigger Cut of Vacation Rental Industry.

Skift Article 171017 - Airbnb Reverses Strategy in Return to Affiliate Partnerships With Big Players.

<sup>8</sup> Ting, D. (2017) *Airbnb Debuts New Tools for a Bigger Cut of the \$138 Billion Vacation Rental Industry*. Available at: <https://skift.com/2017/10/16/airbnb-debuts-new-tools-for-a-bigger-cut-of-the-138-billion-vacation-rental-industry>.

Whereas in 2012, 10 per cent of property managers in the U.S. used Airbnb, today the number is closer to 50 per cent and rising rapidly.

STVR platforms such as Airbnb are moving further and further from their original premise of facilitating rental of a spare room in a primary residence. The world's most prolific Airbnb owner has 881 properties in London and earns \$20 million per year.<sup>9</sup>

## **Mixed Messages from Platforms**

A representative of Phocuswright Travel, Tourism and Hospitality Research observed: "There's a message they're trying to convey – home sharing, travelling like a local, experience local culture, stay in a private home – but actually a growing per cent of (Airbnb's) listings are not really someone's home. It's a condo that is one of 1,000 others that look the same and are run by a hotel-like property management company with a front desk check-in."

Analysts have so far identified more than 100 hosts on Airbnb's site with more than 100 listings, including 39 hosts with more than 200 listings each. This is Airbnb's direction and other STVR platforms are following their lead.

In Victoria, some hosts have from 20 to 30 STVRs, which is equivalent to operating a mid-size hotel. It is clear that despite well-crafted public relations and advocacy, STVR platforms such as Airbnb and Vacation Rentals by Owner (VRBO) need to continuously attract and support new hosts in order to grow.

This moves them increasingly towards large-scale commercial operators, at high cost to local residents and legitimate businesses. Airbnb's business strategy is in major and direct conflict with efforts to reduce housing shortages.

## **Residential and Workforce Housing**

In August 2017, Chemistry Consulting surveyed<sup>10</sup> a broad range of businesses (n=250) in Greater Victoria to determine whether the shortage of housing is making it difficult to recruit and/or retain staff. Three in four businesses (76 per cent) confirmed the lack of rental housing is impacting ability to attract and retain staff, from entry level positions to senior management. For one third of these businesses, the housing shortage is also seriously undermining recruitment. Almost half of the businesses surveyed (47 per cent) attributed the shortage of workforce housing to increased short-term vacation rentals.

## **Impact on Commercial Operations**

There is currently a 16 per cent total sales tax on hotel rooms in Victoria. All levels of government will need to work together to align the short-term vacation rental industry in terms of equitable taxation. Any argument suggesting STVRs should be exempt is unfounded and nonsensical.

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<sup>9</sup> [http://www.telegraph.co.uk/travel/news/airbnb-top-earnings-cities-landlords/?WT.mc\\_id=tmgliveapp\\_iosshare\\_AptSYICt4nc1](http://www.telegraph.co.uk/travel/news/airbnb-top-earnings-cities-landlords/?WT.mc_id=tmgliveapp_iosshare_AptSYICt4nc1)

<sup>10</sup> Report available at [http://www.chemistryconsulting.ca/factors\\_impacting\\_recruitment](http://www.chemistryconsulting.ca/factors_impacting_recruitment)

Short-term vacation rentals are increasingly a commercial leisure product operating in the grey economy. STVRs are not akin to children's clothes or other necessities, and do not warrant exemption from sales tax.

With more STVRs taking up housing stock, it's worth noting that hotels are also reporting an increasing decline in winter snowbird business.

## **Global View**

Victoria Council's decision is not only the right thing to do but it reflects the same concerns being addressed by jurisdictions around the world. Regulatory compliance has been achieved in many cases globally. In jurisdictions where taxation and regulations have been implemented, short-term vacation rental platforms such as Airbnb and VRBO have been able to adapt readily to policy requirements.

For example the City of London, United Kingdom, imposed a limit of 90 rental days per year on each STVR host along with a variety of taxes. As well, the platform, rather than host, is held to account. Airbnb adapted rapidly with some modifications to its coding, in order to keep doing business in one of the world's leading tourism cities. Leverage and terms should always remain with the regulator rather than with the company or platform. Vancouver has just approved <sup>11</sup> new short term rental regulations that stipulate only principal residences can be rented for less than 30 days.

## **Monitoring**

As I mentioned in an earlier address to Council, online tools have made monitoring STVRs simple. We don't need to argue about numbers and locations any more. There are online platforms which track listings and aggregate them quickly and accurately. To address the adverse impacts of short-term rentals on housing stock, Tofino uses online booking aggregators very effectively and efficiently to ensure they know who is renting and whether they comply with their regulatory program.

## **Provincial Role:**

Tourism Victoria continues to work closely with the Provincial Government on fair and forward-thinking approaches to provincial taxation on commercial accommodation, including STVRs. We have written Provincial Ministers asking for government help to level the field, tax-wise, specifically by:

1. Implementing PST and MRDT on all commercial rooms, including short-term rentals
2. Requiring all properties used for short-term rentals to pay Commercial Property Tax
3. Adjusting the MRDT system to incorporate the changing dynamics of the STVR industry.

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<sup>11</sup> <http://vancouver.ca/news-calendar/council-approves-new-short-term-rental-regulations.aspx>

These measures will not only ensure STVR platforms are taxed and regulated appropriately as commercial businesses, but also remove the current incentives to operate in the grey economy.

It is equally imperative for the regulator to have the ability to enforce its rules. The City of Victoria decision reflects this. We strongly urge council to not back down in the face of efforts of a small group representing a special interest contrary to the public good. Enforcement is fundamental to ensuring that regulations do what they are designed to do and make measurable improvements to the quality of civic life.

After considering this issue since June 2016, Victoria City Council is poised to implement a progressive and innovative regulatory framework for Short-Term Vacation Rentals. Council has received significant input from all perspectives and staff have provided excellent policy based analysis. The Proposed Short-Term Rental Regulatory Framework, approved by the Committee of the Whole on September 21, is comprehensive, elegantly putting resident housing first.

This regulatory framework uses all available municipal policy levers to begin levelling the playing field with commercial accommodations. It also gives residents a clear signal about the visitor economy, online sharing-economy platforms and real-estate investors — all commercial activity, including short-term vacation rentals, must work in balance with the community and residents' needs, along with stated public policy priorities such as affordable housing. Tourism Victoria strongly supports this approach and urges Council to complete work on this file and move towards implementation.

Best regards,



Paul Nursey,  
President and CEO  
Tourism Victoria



## **Statement on Commitment to Sustainability**

Tourism Victoria's Vision Statement Reads: "Tourism Victoria will be internationally recognized as a leader in sustainable tourism development, ensuring Greater Victoria remains one of the top destinations in the world."

### **What are Tourism Victoria's Current Efforts in Sustainability?**

- Tourism Victoria has measured its own impact as an organization and is working diligently to reduce it through a series of internal initiatives.
- Tourism Victoria is a certified Green Business by the Vancouver Island Green Business Certification program.
- Tourism Victoria is a proud Gold Level Sponsor of the Vancouver Island Ecostar Awards.
- A central tenant of Tourism Victoria Strategy is to work on seasonality, spreading the business throughout the year.
- Tourism Victoria is one of the few Destination Marketing Organizations that pursues a yield strategy and not a volume strategy. Through segmentation, we are focused on attracting a better customer which spends more and connects with the community as opposed to simply attracting more travellers.
- Tourism Victoria's management team is having brave and difficult conversations with its members about the future and the need to operate responsibly and in a sustainable manner, whilst at the same time presenting a business plan which inspires investment in new, cleaner technology. This has inspired significant new investment.
- Tourism Victoria and three highly regarded partners have launched the IMPACT Sustainable Travel and Tourism Conference with the intent of it taking place each January in Victoria.

### **What are Tourism Victoria's Planned Future Efforts?**

- There is a global effort underway to develop a tested and repeatable methodology to fight "over-tourism." Tourism Victoria is watching how this model, currently in its infancy, develops.
- Tourism Victoria is working to develop a reliable, conservative and legitimate methodology to measure the economic impact in the community. Many economic impact models exaggerate contributions through induced and other indirect contributions. Work is underway but more work is required.
- In the medium term (3-5 years), Tourism Victoria will work with other progressive tourism leaders and academics to attempt to measure the carrying capacity of southern Vancouver Island from a tourism perspective. This will require research and modelling as well as government and citizen input. Tourism Victoria is currently researching best practices around the world.



# The Sharing Economy and Housing Affordability: Evidence from Airbnb

Kyle Barron\*      Edward Kung†      Davide Proserpio‡

October 5, 2017

## Abstract

We assess the impact of home-sharing on residential house prices and rental rates. Using a comprehensive dataset comprised of Airbnb listings from the entire United States, we regress zipcode level house prices and rental rates on the number of Airbnb listings, using fixed effects to control for permanent differences across zipcodes as well as arbitrary CBSA level time trends, and using an instrumental variable based on Google search interest for Airbnb to control for any remaining endogeneity. We find that a 10% increase in Airbnb listings leads to a 0.42% increase in rents and a 0.76% increase in house prices. Moreover, we find that the effect of Airbnb is smaller in zipcodes with a larger share of owner-occupiers, a result consistent with absentee landlords taking their homes away from the long-term rental market and listing them on Airbnb. We present a simple model that rationalizes these findings.

Keywords: Sharing economy, peer-to-peer markets, housing markets, Airbnb

JEL Codes: R31, L86

CAUSATION  
not  
correlation

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‡Marshall School of Business, USC; proserpi@marshall.usc.edu.

fore consistent with absentee landlords substituting away from the rental and for-sale markets for long-term residents and allocating instead to the short-term market.

## 6 Conclusion

Our results suggest that Airbnb growth can explain 0.27% in annual rent growth and 0.49% in annual house price growth from 2012 to 2016. The increases to rental rates and house prices occur through two channels. In the first channel, home-sharing increases rental rates by inducing some landlords to switch from supplying the market for long-term rentals to supplying the market for short-term rentals. The increase in rental rates through this channel is then capitalized into house prices. In the second channel, home-sharing increases house prices directly by enabling homeowners to generate income from excess housing capacity. This raises the value of owning relative to renting, and therefore increases the price-to-rent ratio directly.

Our paper contributes to the debate surrounding home-sharing policy. Critics of home-sharing argue that it raises housing costs for local residents, and we find evidence confirming this effect. On the other hand, we also find evidence that home-sharing increases the value of homes by allowing owners to better utilize excess capacity. In our view, regulations on home-sharing should (at most) seek to limit the reallocation of housing stock from the long-term to the short-term markets, without discouraging the use of home-sharing by owner-occupiers. One regulatory approach could be to only levy occupancy tax on home sharers who rent the entire home for an extended period of time, or to require a proof of owner-occupancy in order to avoid paying occupancy tax.

To summarize the state of the literature on home-sharing, researchers have found that home-sharing 1) raises local rental rates by causing a reallocation of the housing stock; 2) raises house prices through both the capitalization of rents and the increased ability to use excess capacity; and 3) induces market entry by small suppliers of short-term housing who compete with traditional suppliers (Zervas et al. (2017)). More research is needed, however, in order to achieve a more complete welfare analysis of home-sharing. For example, home-sharing may have positive spillover effects on local businesses if it drives a net increase in tourism demand. On the other hand, home-sharing may have negative spillover effects if tourists create negative amenities, such as noise or congestion, for local residents. Moreover, home-sharing introduces

an interesting new mechanism for scaling down the local housing supply in response to negative demand shocks—a mechanism that was not possible when all of the residential housing stock was allocated to the long-term market.

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## Amanda Ferguson

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**Subject:** FW: Commits on Proposed Short Term Rentals Changes In Victoria

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**From:** [REDACTED]  
**Sent:** Friday, November 03, 2017 2:27 PM  
**To:** Victoria Mayor and Council <mayorandcouncil@victoria.ca>  
**Cc:** Legislative Services email <LegislativeServices@victoria.ca>  
**Subject:** Commits on Proposed Short Term Rentals Changes In Victoria

Attention Mayor Helps and City Council,

My wife and I this year purchased a condo unit in the [REDACTED] building to use for a short term rental. We paid approximately [REDACTED] for this unit. This was quite expense but we wanted to run a legal and above board short term rental and this unit was both zoned in the transient area and as well the strata allowed short term rentals.

The reason we decided on this venture is because we are both self-employed and have no pensions (other than government CPP) and hope to build some equity in the condo over the next 5 to 10 years at which time we hope to retire.

Before purchasing the unit we checked with the City Zoning and Strata to make sure there were no issues in operating this as a short term rental.

Our purchasing decision was based on the expectation that we would be able to operate this business.

Once purchased we obtained our business license and purchased over \$12,000 of new furniture for the condo. We purchase all high end sheets, duvets, etc. to make this an above average accommodation in the heart of Victoria.

Since we have opened we have hosted dozens of guests (couples and families) from around the world who have come to Victoria to view the wonderful city and sites nearby. We have been very attentive hosts having obtains both Super Host and Business Host status and as well have received 5 star ratings for accommodation and service from every single guest who has stayed. We have not had one problem with guests or with the other Strata owners about our business or guests. So we are doing a great job and really making the guest's Victoria stay memorable.

These guests have decided to stay with us because we provide a superior quality accommodation and host services at quite a bit less cost than the local hotels charge.

We always ask our guest why they have chosen to stay with us and invariably it is because of condo size, no charge parking, location, included patio, and multiple services like high speed internet, countless TV channels, coffee/tea, flowers, milk and cream, a full kitchen with every appliance and the list goes on.

These guests have spent thousands of dollars at the local downtown restaurants, shops, and various merchants. We purchase all our supplies locally from downtown sources.

By providing a lower cost premium accommodation, our guests have money to spend in Victoria which is what we all want.

Recently we saw the published changes of the City and its intended changes to the short term rental. We also attended the open house and reviewed the comments.

The following seemed to be the justification presented in the information:

Council wants to return short term rentals to the housing pool to allow more family rentals

This sounds really good and makes some sense when taken out of context. However, in most cases the units being used for short term rentals (especially small condos like we have) will never be used for rentals for many reasons. Here are a few:

1. The high cost of purchase [REDACTED] means that the monthly cost for us is about [REDACTED] a month just to pay the mortgage and basic utilities. We also have to pay income tax on any revenues which is another 30% of the current costs. The condo is 540 sq. ft. with one small bedroom. This unit size is only suitable for 1 or 2 people and would never work long term for a family as any family will need 2 or more bedrooms. Secondly, no family and especially a young family could afford this and would likely live out of the downtown core where prices are cheaper and more suitable accommodation could be found.

A typical 2 bedroom rental in Victoria runs \$1500 to \$1800 a month. For us to rent in this market would mean that we would have to subsidize the rent by at least \$700 to \$1000 a month. This is obviously silly and no one would ever do this and nor could we ever afford to do that. So this really means our condo would never be used to provide rentals to families.

If your intention is to provide downtown rentals to wealth, high income single or couple then your proposal makes some sense. But for families the reasoning is faulty as it really is not affordable or doable by them.

2. It is not house or condo owners responsibility to provide low cost rental accommodation to families and individuals. If this is something that the current council wants to happen then the City should take a proactive action rather than loading this onto the short term rentals property owners.

You could perhaps consider the following:

- a) Set aside city owned property and designate it for low cost rental housing and sell at a reduced cost to developers.
- b) Provide property tax breaks to encourage developers to build low cost rental housing (It has to have some profit).
- c) Reduce the multiple and expensive business license fees to make building less expensive.

I am sure there are many more things that could be done by the City to reduce the construction costs of low cost rental units.

The lower cost development means lower rents and more families can afford it.

Short Term Rentals in Homes Versus Self-Contained Units

You are proposing to make it easier and a lower cost business license fee for people owning home who rent out one or two rooms.

And much more difficult for units fully designated for rental. It seems that this has not really been thought out.

A friend of ours who owns a home and rents a room for short term rental (due to financial necessity) is constantly worried about the people who come to stay. They are mostly unknown and she feels a lot of stress from the possibility of something happening to her or her son. In a self-contained condo like ours this can never happen as the guests are isolated in their own unit with no access to us or anyone else in the building. This is a lot safer situation for the hosts.

It would seem to me that a condo like ours would really be a better and safer situation for rentals. From this I don't understand the City's logic of differentiating the Primary Resident rentals and the standalone units. I would be very interested in hearing the City's comments and rationalization for this. We think both types of rentals should be treated the same as they provide the same service.

#### Proposed Business License Requirements

The Strata Letter requirement has the following serious problem:

1. Strata councils are voluntary and most people overworked. It seems like having strata councils having to provide to the City a letter is going to be very difficult. Additionally the strata can add a fee for this service. I don't think that the City has legislative authority or should be involved in decisions that are between property owners and the Strata. Likewise, I don't think Strata councils should be forced to do work that the City should be responsible for. Rather, a voluntary declaration by the licensee application should be sufficient. It seems to work in most other business requirements in the city. If there are problems the owners and Strata can sort it out themselves.

#### Proposed Business License Fees

We paid \$115 for our business license to operate our short term rental this year. We thought that was a reasonable fee. We also publish the fact we have a business license and include it in our advertising.

Your proposal of increasing our rental business license fee to \$2500 is absolutely unreasonable. There is no merit or reason to do this.

It is our understanding that the hotels pay an average of \$5 per room licensing fee in Victoria. It is our understanding that the maximum current business license is \$600 in Victoria. Where is the justification for such a high amount?

The statement "As the units can be operated as short term rental full time, the proposed fee is higher" makes no sense. The Principal Resident rentals can just as well operate full time and could have significant incomes if fully occupied during the year.

Do you charge a business license fee to any other business in Victoria based on their potential income or ability to operate year round?

You propose that Principal Residence pay \$200 which I think should be the same for both types of rentals as they provide basically the same service.

This fee should not be a tax grab but rather a fee amount base to pay reasonable cost recovery by the City.



Finally, let me ask this questions. Do you think the people who live in the high end area of Lansdowne should be forced to provide low rental accommodation for families? Your proposal suggests this is the same as the short term rental requirements proposed. In any city in Canada, people with more money buy more expensive houses and those of less income purchase houses at a lower cost which often is out of the more expensive city core.

It is highly unfair to put the rental policy on the heads of a very small proportion of short term rentals when there are thousands of longer term rentals that are not affected in anyway and do not require business Licensing because they are covered by the BC Tenancy Act. Just because you have jurisdiction for short term rentals does not mean you have to take draconian measures against this small group of business people in Victoria.

I have tried to be objective in my response here. However, I can't help having the following questions which I would like to know the answers to:

1. Why are the short term rentals being so unjustly treated? Is this based on lobbying from the hotel/motel group in Victoria who simply do not want any competition? Everyone knows competition drives down prices. Therefore allowing guests to come to Victoria instead of staying away provides to them the possibility of spending more money at local stores, merchants, or tourist sites.
2. Why was the recent proposed changes not advertised to us even though we had a short term business license? We found out about this reading it afterwards in the papers rather than being notified as we should have since we are the ones affected by the proposed changes.
3. Why did the Council vote goes against the recommendations of the City Staff?
4. Why did the zoning vote go ahead when so many of the City Councillors had recused themselves? Shouldn't this indicate further discussion and work were needed? A small special interest group in the Council should not have made such far reaching decisions without first having a Public Hearing to allow discussion and information dissemination by and to those affected.

Thank you for taking time to read my comments. I hope you will seriously consider these and not proceed with with these changes. I request that you take a step back and work with the rental community to work out a better strategy that protects the interest of the rental owners and promotes Victoria as a world class tourist location.

We are proud of the service and accomodation we provide to tourists but think these changes may cause us to reconsider continuing this. The City will suffer a revenue reduction and many people will just no longer come here but go to other Cities with more reasonable short term rental policies. This does not help families, the City, or us.

Sincerely,

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