

From:

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Sent: To: May-02-19 2:30 PM Bellisario, Adelina

Subject:

FW: Feedback on Vaughan preliminary short-term rental by-law - Airbnb

From: Sta Kuzviwanza <sta.kuzviwanza@airbnb.com>

Sent: Thursday, May 02, 2019 1:47 PM

To: Clerks@vaughan.ca

Subject: Feedback on Vaughan preliminary short-term rental by-law - Airbnb

Thank you for the opportunity to respond to Vaughan staff's <u>preliminary recommendations</u> for short-term rental regulations ahead of the release of the May report.

While short-term rentals have been part of Vaughan's economy for generations, we recognize the desire of the community to develop short-term rental rules that foster healthy home sharing. Our experience working with governments around the world has consistently shown that broad and thoughtful consultation, drawing upon facts and constructive experiences in other cities and communities, are the best way to reach a positive outcome for hosts, guests, neighbours, and the entire community. With that in mind, we would like to provide some feedback on your current proposal.

Given the size of the host community in Vaughan, we would like to re-emphasize the importance of taking an approach that accounts for the size and scale of the community. A light-touch framework that avoids an unreasonable burden on responsible hosts would be better suited to achieving Vaughan's compliance and enforcement objectives. Cities with small host communities have had greater success when they choose to not duplicate the regulatory frameworks of municipalities like Toronto or Vancouver, who have significantly larger host communities. We encourage you to continue to look for a tailored, made-in-Vaughan solution that reflects the actual scale of home sharing in Vaughan.

One of our biggest concerns as set out in your preliminary proposal is the fee that prospective hosts would be expected to pay in order to register their property with the city. This fee, scaling from \$300 to up to \$10,000 for hosts with more than one property, is very high. The majority of Airbnb hosts are sharing the home where they live and use the platform to make a little extra income each month. Recognizing the casual nature of home sharing through affordable licensing fees is an important first step in encouraging compliance. For example, some communities have put forward a reasonable licensing fee of \$50 annually for hosts.

Given that you are considering a municipal registration system, we encourage staff to explore the option of an online registration system, if this is not already being done. Our experience in other jurisdictions has shown that providing a simple online registration process encourages higher compliance rates. Our hosts are responsible community members who want to abide by the law. As more government and consumer services are being made available online, we support a digital registration option that encourages compliance through ease of application. Effective registries are easy to access and complete, available online, and subject to no or low fees.

We have also noted that the proposal for short-term rentals will be restricted to one per property. We would question the fundamental reason for that proposed restriction. It is not yet clear how secondary suites or hosts renting out more than one bedroom will be addressed in this framework.

Many hosts may own homes with existing basement or attic suites, which they require for their own use when welcoming friends or family, or they may not be suitable for the long-term rental market. In either scenario,

home sharing that space is a reasonable option that can help pay the bills. In fact, many of our hosts have pointed to home sharing as the means by which they are even able to stay in their home, given the high cost of living. For these reasons, we encourage you to allow home sharing in secondary suites.

Additionally, many hosts appreciate the flexibility of being able to rent out more than one bedroom in their home. Some hosts end up listing a secondary bedroom so that they are able to accommodate families, who often require more than one bedroom. The potential restriction of one short-term rental per property, which could be interpreted as one bedroom per property, could cause unintended confusion to hosts and severely impact the diversity and accessibility of accommodation offerings in Vaughan.

As you prepare your report and recommendations ahead of a council vote, we sincerely hope that this input will prove to be helpful as you consider policy options. We stand by our commitment to be a good community partner in your consultations and we continue to urge you to not over-regulate the entire home sharing community - a community that is made up of Vaughan citizens who are helping bring recognition to the hospitality of your city to travellers from around the world.

Best Regards,

Sta Kuzviwanza



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