From: Nathan Rotman
To: City Council

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To His Worship the Mayor and Members of City Council

First Name Nathan Last Name Rotman

Email nathan.rotman@airbnb.com

Address 101 College St

City Toronto

Province Ontario

Postal Code M5G1L7

Name of the organization or agency you are representing (if applicable) Airbnb Canada

Subject Proposed Regulations for Short-Term Accommodations

Meeting (if known) Municipal Planning Commission - Jan 28, 2020

Comments

Dear Members of the Municipal Planning Commission,

This week, Saskatoon city administration released a report considering options to regulate short-term rentals. These rental accommodations are critical for the economic growth of the city.

Across the city, regular Saskatoon residents are engaged in the \$503 million tourism industry, welcoming guests and sharing local experiences with visitors from around the world. Better still, the income earned by Airbnb hosts stays in the city, helping to support small businesses and grow the local economy. In fact, Airbnb hosts report spending more than half the money they earn through the platform on expenses like mortgage payments and household bills. These hosts include retirees and empty nesters sharing the extra space in their home and young people and couples that rely on home sharing to help pay their mortgage, save for unexpected expenses or make necessary renovations.

Saskatoon's approximately 600 active Airbnb listings makes the city a more affordable and desirable travel destination. As Saskatchewan's hub city, the short-term rental market is predominantly used by residents of the province, visiting the city for medical appointments, services, shopping and to visit friends and family. In fact, 38% of all guest arrivals in the last year are visitors from elsewhere in Saskatchewan, and 21% are visitors from Alberta. This is corroborated by Tourism Saskatchewan's own statistics which report that visiting friends and relatives is the primary reason for

travel to Saskatoon. This highlights the need to take a cautious approach to regulating what is a common activity for families from across the province.

The recommended option #3 moves Saskatoon's tourism economy forward but also creates needless red tape for Airbnb hosts in the city. While the suggested bylaw will give Airbnb hosts the much needed certainty they've sought, we would like to outline several areas of concern.

Registration: Based on our experiences in communities around the world, and here in Canada, for a registration system to function well there needs to be as little friction as possible. Airbnb hosts often only list their homes for a limited number of days while on holiday or leaving town for work. We are encouraged by our discussions with Saskatoon's public administration but ask that the city continue to work and consult with us on the best way to ensure maximum compliance with your registration and licensing regime.

Paved on-site parking: The requirements for two parking spots should only be necessary if there are infractions to existing bylaws. Parking violations can already be handled by pre-existing bylaws around parking enforcement. Many of our guests don't drive cars when visiting cities and prefer to travel by public transit, taxi or ridesharing. Similarly, not all Airbnb hosts have cars and may not be using a parking spot at all. We would encourage the city to consider strongly what problem they are trying to fix with this requirement, and avoid adding unnecessary red tape.

Permission of landlord or condo board: While we do agree that in order to minimize conflict, an Airbnb host should have permission to short-term rent their space, the requirement that Airbnb hosts must get landlord or condo board approval imposes an unnecessary and repetitive bureaucratic burden. Requiring either a tenant, with a legally binding lease agreement, or a condo owner with a legally binding set of condominium by-laws, to seek additional clarity and permission is burdensome and unnecessary. If the lease agreement and/or condo by-laws are legally binding documents, there is absolutely no reason that such a repetitive regulation should be put in place. Moreover, the refusal of the owners or the condominium boards to give the operator permission will result in disputes that will clutter the courts or administrative tribunals, which are already in great demand.

Airbnb would suggest that, like in many other jurisdictions, the host confirm their eligibility through self-attestation. Airbnb would gladly provide examples of jurisdictions in Canada or elsewhere where self-attestation is functioning well, with digital platform cooperation.

Requirement for discretionary use approval in low and medium density residential zoning districts: Home sharing in one's home doesn't impact the residential character of an area. Instead, especially outside of a city core, it allows out-of-town families and friends to visit for special occasions and celebrations. We encourage the deletion of this requirement in the by-law. The process for discretionary use approvals are especially onerous on non-commercial providers of accommodation services like Airbnb hosts. Hosts are usually registering to share their extra space while away at the last minute and the longer the process, the harder it is for regular people who are

trying to engage in this type of activity.

We would welcome the opportunity to discuss these issues, answer questions and move forward together to expand Saskatoon's tourism opportunities.

Thank you,

Nathan Rotman Airbnb Canada Attachments

The results of this submission may be viewed at:

https://www.saskatoon.ca/node/398/submission/362623