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Hi, my name is Suzanne Aziz and I'm a property owner here in London, Ontario and just started running an Airbnb this Jan. I'm also a landlord of two other properties (with tenants) and a realtor so feel I have a varied enough background to respond.

I've read about the proposed licensing system and would just like to give you my thoughts on this.

First off, when you own a home it comes with certain rights; The right of possession, the right of control, the right of exclusion, the right to derive income and the right of disposition. I realize within these rights the government does have overriding rights, for example, the right of expropriation but in general we are usually allowed to do what is best for us, as long as it is not detrimental to neighbors.

As per your proposed regulations, a Short Term Accommodation (STA) would only be allowed in a principal residence, either the whole house or a room in this house, **which begs the questions, if someone is using their whole house for an Airbnb, where are they living during this time?** There is no mention of my scenario, where it is attached to our principal residence, but has a separate entrance. We've had a rental unit back there for over 30 years, and it's had a rental license since they became mandated. This unit would now be called a Secondary Dwelling Unit (or granny suite). I think the definition of "principal residence" needs a closer look.

I would like to address some parts of the specific plan.

Under the Strategic Plan 5.1, it mentions Fire Safety, and as I already have a Rental License, my unit has already been inspected by the Fire Department.

Also, I contacted my insurance company to let them know that I was starting an Airbnb, and my insurance went up a total of \$1.00 a year, yes really \$1.00, so obviously they have no major concerns. Under Analysis 2.1, it stated that the rate of growth of Airbnbs between 2018 and 2021 was relatively stable at 4%, so this is not really skyrocketing growth.

The survey stated that 441 rentals were "entire homes" at 67%, And 211 rentals were "private rooms" at 32%, which makes 99%, so I think I must be falling in the other 1%, but again what is the definition of an "entire home", and if it is their primary residence, where are they going?

Under 2.2. The Effects of STA's' it states that profitability has caused both commercial and individual landlords to leave the long term rental market, which thus reduces supply, and yes this makes sense, but it also states in the report that it is the commercial operators who manage multiple listings that generated over 50% of all Airbnb revenue in 2019. So it really seems to me that the target should be the

commercial operators, not the few individual homeowners who just want to provide a great experience for people visiting our great city.

Also, your STA regulations won't apply to units that are rented for more than 30 days, these would be considered long-term accommodation, and as such GST/HST is not charged, but currently if I rent out my unit for less than 30 days, I must charge and remit GST/HST to the government.

As for a Municipal Accommodation Tax, I feel that since I am already paying the GST/HST to the government, it's not really fair to be taxed twice. I don't feel I am in competition with the hotels, motels etc because I am offering a totally different guest experience, one where guests want the feel of a home, with a full kitchen and other home amenities.

Airbnb's are part of a huge technological change happening to almost every industry in the world, from hotels to taxis, and there will always be some adjustment. I would ask if you have ever stayed in an Airbnb or used an Uber.

I personally have stayed in Airbnbs in Italy, with the host in part of the house, and that's the experience I wanted.

As mentioned, I have just started my Airbnb but have had 3 longer stay guests, all for differing reasons; First, an engineer from England who was here working on our new Maple Leaf Foods plant, second an Ivey School of business student who can't access his apartment til the beginning of April, and soon, a husband & wife who will be renovating their home and need a place to stay.

I do have people booked throughout the summer, and the main reason they want to stay is the location, home-like amenities (kitchen) and experience of local hosts.

There are also many other reasons why someone would need to stay in a STA. As a realtor, often a house will close but the sellers don't take possession of their new home for a few weeks, months etc, so they need a place to stay (while putting their items in storage). It is almost impossible to get a lease under a year so where will they go; a hotel is way too expensive for that length of time and most don't have cooking facilities.

Under Key Recommendations in the report you mention Licensing, which absolutely makes sense. It stated that these large parties that make the news were typically not held in the principal residence but an investment property rented out as an Airbnb and Airbnb has since improved their regulations. It was stated in the meeting that there were many "incidents reported" but no idea if these happened in homes where the landlord was present or the "investor" Airbnb's managed by these large corporations. I think this is a major thing to investigate before tarnishing all Airbnbs. This is easy enough to find out if you can access the Land Registry system to see who owns it (as a realtor I can). Chances are if it's a numbered company then it's owned by a larger corporation.

I also have my own rules, I limit the number of guests, I only allow guests with good reviews to stay, I meet my guests in person (no lockboxes), and I can see and hear when they are coming and going, and can intercede right away if something is wrong.

I will also address the elephant in the room which is bad tenants. I spent a lot of money getting my Airbnb going because I don't want the hassle of dealing with bad tenants. I've done that for too long and wasted too much time and money, it's very sad but this is the truth.

Unfortunately, the Landlord and Tenant board was backed up before the Pandemic and now it's even worse. We've had tenants who stopped paying rent and it took 6 months to evict them, all with no rent money coming in, and now it's even worse. Once again, the big commercial landlords can manage but the small individual owners can't.

As a realtor, when someone approaches me to buy an investment property, the first thing I do is say, you need to do some research and think seriously about this, and tell them even with the best tenant screening be prepared for 6 months of no rent if they default.

There are definitely ways to minimize the supposed detriments of some Airbnbs such as;

1. Licensing, same as for Rentals,
2. Perhaps only allow 1 Airbnb per homeowner, thus not allowing larger corporations to take over
3. Limiting the Airbnb owner to live in the actual city, in case of emergency situations

Finally, in the report it states "growth of STA has contributed to housing shortages across cities, as dwindling supply of homes for sale and rent have artificially driven up prices"

This housing shortage has been an issue for many years and the pandemic just exacerbated it. A few things the government could do are;

- Limit foreign ownership for 2-5 years (New Zealand did this)
- Investors need to put a higher minimum downpayment down (up it to 50% from 20%) and they can't borrow this money from the banks
- Zoning changes - to overcome NIMBYISM,

Also, the government has to overhaul the Landlord and Tenant board because it is not working. Please just google backlogs at Landlord and Tenant board and you will see. If I knew that as a landlord my rights were being taken into consideration then I would consider going back to long term rentals but at this time, they are not, and I am not risking my hard-earned money and time for the risk of bad tenants.

Thank you for taking the time to read my very long letter, but I just feel there are quite a few different aspects to this situation that need to be taken into consideration.

Sincerely,
Suzanne Aziz