


TITLE: CITY OF CHARLOTTETOWN OFFICIAL PLAN AND ZONING & DEVELOPMENT BY-LAW SHORT-TERM RENTAL (STR) AMENDMENTS FILE: PLAN-2022-04-JANUARY-		
MEETING DATE: January 04, 2022		Page 1 of 12
DEPARTMENT: Planning & Heritage	ATTACHMENTS: Attachment A – Official Plan Policy: Sustaining Charlottetown’s Neighbourhoods Attachment B – Official Plan Policy: Supporting Home Occupations Attachment C – Secondary Suites Attachment D – Garden Suites Attachment E – Tourist Accommodations Attachment F – Parking Space Standards Attachment G – Appendix A. Definitions Attachment H – Public Feedback Support Recommendation Attachment I – Public Feedback Alternative Recommendation Attachment J – Public Feedback Oppose Recommendation Attachment K – Public Petitions Attachment L – Public Survey Results June 2019 Attachment M – STR Report Urban Politics and Governance research group, McGill University Attachment N – Technical Background Report	

RECOMMENDATION:

The Planning & Heritage Department recommends that the proposed amendments as follows:

Official Plan amendments pertaining to:

- Section 3.2 Sustaining Charlottetown’s Neighbourhoods; and
- Section 4.5 Supporting Home Occupations.

and the Zoning & Development By-law amendments pertaining to:

- Section 5.6 Secondary Suites;
- Section 5.7 Garden Suites;
- Section 5.11 Tourist Accommodations on Residential Properties;
- Section 43.1 Parking Space Standards;
- Appendix A. Definitions.

be *approved*.

Once Council provides direction on regulating Short-term Rentals (STR's), staff will return with all the supporting regulatory documentation (i.e. Enforcement and Summary Proceedings and an STR Registration By-laws) to implement council's direction including a proposed date when all by-law amendments will be in force and effect.

BACKGROUND / ANALYSIS:

In the summer of 2019, Council directed staff to undertake research, obtain public feedback and provide options on regulating short-term rentals (STRs) within the City of Charlottetown. After extensive research, discussion with stakeholders and consultation with a leading expert in the STR field, staff has prepared regulatory options for STRs. The proposed regulatory framework has been designed to provide opportunities for residents to benefit from the STR economy while establishing appropriate measures that minimize the negative consequences of STR activities that impact housing, generate nuisances, and disrupt community harmony. The concerns of ensuring the health and safety, consumer protection and the economic and social well-being of the municipality have been the focus of these proposed regulations. Staff released a technical background report in September 2021, that outlines the findings of extensive research, public consultation, and options to effectively regulate STRs.

For existing tourist accommodations, only those properties that were legally approved through the City of Charlottetown land use and/or building permit process and which conformed to the regulations of the *Home Occupation* section by way of the *Tourist Accommodations* regulations of the Zoning & Development By-law would be allowed to continue operations. The dwelling type that a tourist accommodation was allowed to operate in was a single-detached dwelling. Furthermore, any *Home Occupation* required a permit to operate under specific conditions contained therein.

History

Starting in the spring of 2019 the city sought to obtain a community wide opinion on STR's by distributing a survey and eliciting feedback through both print and social media. A variety of responses were received from STR platforms, hosts/operators, housing advocates, homeowners, and other residents. It is noted that many of the survey responses, between 66% to 80% of respondents had a favorable disposition of allowing STRs in some type of form or another but the majority agreed that limits be placed on STR operations (see **Attachment L**). The relatively low number of respondents and type of feedback received, suggests that residents who took the time to respond had an interest in STRs, this could result in biases if this data alone were to be used to inform policy options. To ensure that council is fully informed of the situation and possible options, the city hired a third-party data scrapping tool to determine the scope of local STR operations and consulted with Professor David Wachsmuth and his team at McGill University Urban Politics and Governance research group to devise five (5) scenarios of varying degree regarding STR regulations (see **Attachment M**). On March 9th, 2020, council requested that planning staff craft and present proposed STR amendments based on scenario/option 4 outlined in the Wachsmuth report. A special meeting for Planning Board was scheduled for March 13th, 2020, but due to the COVID pandemic the meeting was cancelled, and the file placed on hold.

A year later staff sought to reengage the public on the STR issue by hosting the first public meeting to present the various scenarios, data collected and receive feedback from residents. During this public consultation phase the department received various responses via email, phone calls and meetings on the scenarios. Based on the feedback collected, STR data scrappings, and additional research conducted by staff, a formal recommendation in the form of scenario 1 was presented to the Planning Board and the public in October 2021. A background technical report that summarizes the data, regulations, and provides context to the situation was published on the city's website on September 23, 2021 (see **Attachment N**). Based on the information and feedback collected by staff a formal recommendation based on option/scenario 1 from the Wachsmuth report was put forward by the Planning & Heritage department. The previous council motion of option/scenario 4 was

rescinded to bring forward staff's recommendation. The formal public meeting was held in November 2021 to receive feedback on the proposed regulatory scenario.

RECOMMENDATIONS FOR A REGULATORY FRAMEWORK

Specific measures recommended by staff include:

1. Enacting a Short-term Rental Licensing By-law to govern the activities of short-term rental platforms, agents and hosts, including:
 - a. Registration and Licensing requirements for platforms and STR operators;
 - b. The establishment of a short-term rental license, regulations and fees for STR operators;
 - c. Proposed Official Plan amendments for dictating the direction of growth for STRs;
 - d. Implementation of the Zoning & Development By-law amendments for the regulation of STRs as defined by council;
2. Allow for a grace period to provide a reasonable amount of time for operators to be educated on the proposed regulations and licensing requirements and register their STR. Jurisdictional scan of other municipalities have shown that a one (1) year grace period is provided after adaptation of regulations to educate operators/hosts about municipal requirements.
3. Create a webpage on Charlottetown.ca to explain the City regulations with respect to STR guests and hosts.
4. Establish an enforcement regime to enforce the by-law regulations and licensing requirements through the implementation of an Enforcement and Summary Proceedings By-law.
5. Establish cost recovery through a combination of registration/permit fees.
6. Provide specific exemptions from the proposed regulations to allow for a hotel, motel, cottage and bed and breakfast to use the STR marketing platforms.
7. Provide staff with the direction to hire a third-party monitoring tool to track and provide tools to staff to assist with monitoring and enforcement with the regulatory framework adopted by Council.

Official Plan Amendment - Sustaining Charlottetown's Neighbourhoods (Attachment A)

Under section 3.2 *Sustaining Charlottetown's Neighbourhoods* the goal states that "Our **goal** is to maintain the distinct character of Charlottetown's neighbourhoods, to enhance the special qualities

of each, and to help them adjust to the challenges of economic and social transformation”. The first proposed Official Plan amendment to recognize a short-term rental use is for those residential STRs that are of a home sharing nature that respect the character of residential neighbourhoods and do not compromise the sense of place that has been established. The following policy is proposed to be incorporated to section 3.2.1:

*Our **policy** shall be to ensure that a short-term rental operation in a residential area shall be restricted to the operator/host’s principal residence and be of a scale that is compatible with the character of the surrounding neighbourhood.*

The proposed policy is meant to accommodate for the home sharing economy made popular by online marketing platforms while maintaining the residential character of residential areas.

Official Plan Amendment – Supporting Home Occupations (Attachment B)

Under section 4.5 *Supporting Home Occupations* the goal states that “*Our **goal** is encourage home occupations as a platform for new economic growth and community development* “. The popularity of STR online marketing platforms has provided some members of the community the ability to provide alternative forms of accommodation to tourists by way of short-term renting their residence. Tourism is an important economic generator for not only the City but the Province as well, as such some of these commercial listings provide additional needed capacity for tourists who seek these alternative forms of accommodation. However, a balance needs to be maintained to allow for these types of accommodations but not at the expense of compromising the existing residential long-term housing market. Therefore, staff proposes the following policy to be included under section 4.5.2:

*Our **policy** shall be to require that all operators of bed & breakfast and tourist home establishments be registered and licensed by both the Province and the City of Charlottetown.*

Short-term Rentals within a Secondary Suite (Attachment C)

Presently, the by-law does not permit a secondary suite to be used as an STR, staff elected to restrict this activity due to the proliferation of unregistered/undocumented STR in the municipality. A jurisdictional scan of STR regulations has shown that some municipalities have allowed secondary suites to be used as an STR under the condition that the host/operator is present at the time of stay. This model would be an indicator of supporting a home sharing economy. Staff proposes the following change to subsection 5.6.1 (g) under Section 5.6 SECONDARY SUITES:

5.6.1 One (1) Secondary Suite may be permitted in a Single-detached Dwelling subject to the following conditions:

- g. Can be used as a short-term rental under the condition that the operator/host must be present in the principal dwelling unit during the time of stay.

Short-term Rentals within a Garden Suite (Attachment D)

Like secondary suites a STR cannot be operated in a garden suite under the current by-law regulations. However, like secondary suites other municipal jurisdictions have allowed these types of accommodation to be used for a STR when the host/operator is present onsite. This would be indicative to a home sharing model whereby the main dwelling on the property would stay in the long-term housing supply. Staff proposes the following change to subsection 5.7.2 (i) as follows:

5.7 GARDEN SUITES:

5.7.2 The Garden Suite shall be subject to the following conditions:

- i. Can be used as a short-term rental under the condition that the operator/host must be present in the principal dwelling unit during the time of stay.

Tourist Home regulations by way of a Tourist Accommodation (Attachment E)

The Zoning & Development By-law does not contain provisions or regulations to deal with short-term rentals. As such, staff is proposing to explicitly define and regulate the various residential tourism land uses (i.e., tourist home, hostel, and bed & breakfast) that are permitted in the by-law. As such staff is proposing to separate regulations for a tourist home in its own subsection of section 5.11 Tourist Accommodation on Residential Properties. There will be a set of regulations for bed & breakfast and hostels that will differ from regulations pertaining to a tourist home.

The proposed tourist home regulations to the By-law will follow the policy direction of the Official Plan to ensure that STRs that are permitted in residential areas of the City will be compatible with the surrounding neighbourhood and be home sharing in nature.

The key requirements of a Tourist Home are as follows:

- 1) Can occur in any type of dwelling unit *except* apartment dwelling units.
- 2) Operator/host's principal residence;

- 3) the entire dwelling unit or part thereof can only be rented to one (1) guest and their party of guests;
- 4) maximum of 4 bedrooms can be rented at any one time; and
- 5) The operator/host does not have to be present at time of stay.

Staff are proposing that a *Tourist Home* now defined as a residential STR and only permitted in the operator's *Principal Residence*, either the entire dwelling unit or part thereof by way of either a *secondary* or *garden suite*. The proposed amendments seek to strike a balanced approach of accommodating STRs in an owner/host's principal residence that are in high demand and support the tourism industry but at the same time protecting long-term housing in residential areas by ensuring these types of accommodations remain in the home sharing economy.

Parking Space Standards (Attachment F)

The parking requirements for an STR was based on research from other jurisdictions. Note that for residential properties in the 500 Lot Area would not be subject to these requirements but to the existing exemptions outlined in the Zoning & Development By-law section 44.2 Parking in the 500 Lot Area Requirements. Based on the varying forms of tourist accommodations, staff proposes the following parking requirements for each corresponding type of tourist accommodation:

Tourist Accommodation: Bed & Breakfast, Heritage Inn, or Hostel: 1 space per 3 bedrooms or guest rooms, plus 1 space for the operator/proprietor.

Tourist Accommodation: Tourist Home: 2 spaces minimum.

Appendix A. Definitions (Attachment G)

To clarify the various types of tourism land uses the following definitions are proposed:

Booking means a confirmed reservation of the dwelling unit or portion thereof, up to a maximum of four (4) bedrooms, as a Short-term Rental lodging.

Principal Residence means:

- a. the residential unit that is owned or rented by a natural person, alone or with others, where the natural person is ordinarily resident and makes their home and conducts their daily affairs, including, without limitation, paying bills and receiving documentation related to identification, taxation, and insurance purposes, driver's licenses, income tax returns,

medical plan documentation, vehicle registration and voter registration; or similar information; and

- b. where the natural person has no other property designated as such within the City of Charlottetown or any other jurisdiction.

Short-term Rental means the rental of an entire dwelling unit or a portion of a dwelling unit that serves as the operator/host's principal residence for a period of less than 28 consecutive days and defined as a permitted use by way of a *Tourist Home*.

Tourist Accommodation means temporary accommodations for travelers or transients within a Dwelling Unit for the exclusive use of one (1) guest and their party of guests, such as a Bed & Breakfast, Hostel or Tourist Home, but a Hotel and Motel are separate uses and separately defined.

Tourist Home means temporary accommodations for travelers or transients within a Principal Residence of the operator/host that is not a company or corporation for the exclusive use of one (1) guest and their party of guests, such as a Short-term rental lodging but a Bed & Breakfast, Hostel, and Hotel are separate uses and separately defined.

LEGISLATIVE REQUIREMENTS:

Grandfathering Status of Existing STR's

Since at least 2006, the Zoning & Development By-law has contained regulations and requirements for any resident who sought to use their principle dwelling as a tourist accommodation by way of a home occupation. The requirements to operate a tourist accommodation from a private dwelling has and presently been as follows:

- 1) The operator/proprietor of the home occupation shall live in the dwelling (home occupation requirement);
- 2) Only permitted in a single-detached dwelling;
- 3) Up to four (4) bedrooms used for the tourist accommodation;
- 4) Licensed under the *Tourism Industry Act*;
- 5) No kitchen and/or cooking appliances are permitted in a guest room;
- 6) No meals other than breakfast are provided to guests;
- 7) Parking and Signage subject to regulations of the by-law.

Since 1998, the department has received approximately 53 tourist accommodation applications, of which approximately 31 applications were approved. In 2021, there were ten (10) home occupation (i.e. tourist accommodation) applications and the department approved six (6) of these

applications as per the Zoning By-law Home Occupation requirements. The other tourist accommodation applications were rejected either because the applicant withdrew the submission, or the application did not adhere to the zoning regulations for a tourist accommodation.

It is in staff's opinion that any STR operation that does not adhere to the regulations outlined above that have been in place since at least 2006 cannot be grandfathered. To do so would undermine the existing regulations, the approvals provided to those that conformed to said regulations which would erode the integrity of the Zoning & Development By-law.

Notification

On October 12, 2021, Council passed the following resolution:

That Council rescind its resolution of March 9, 2020, to proceed with scenario 4, and that the proposed amendments as follows:

- *Official Plan amendments pertaining to:*
 - *Section 3.2 Sustaining Charlottetown's Neighbourhoods; and*
 - *Section 4.5 Supporting Home Occupations.*

- *and the Zoning & Development By-law amendments pertaining to:*
 - *Section 5.6 Secondary Suites;*
 - *Section 5.7 Garden Suites;*
 - *Section 5.11 Tourist Accommodations on Residential Properties;*
 - *Section 43.1 Parking Space Standards;*
 - *Appendix A. Definitions.*

be approved to proceed to public consultation.

As per council's resolution staff notified the public of the meeting in accordance with Section 3.10.7 of the Zoning & Development By-law PH-ZD.2. Staff collected public feedback (i.e. emails, calls, written submissions) up until November 19th, 2021.

Public Meetings

The formal public meeting of Council to receive feedback on the proposed regulations was held on November 09, 2021, at 7:00 p.m. on the Mainstage, Confederation Centre of the Arts, at 145 Richmond Street. During the public meeting approximately 27 residents spoke to the proposed

amendments. See transcript/minutes for details. Prior to the formal public meeting there was another public meeting hosted by the City at the Confederation Centre of the Arts on May 17, 2021, to present data collected on local STR operations and outline five (5) potential STR regulatory scenarios. At both public meetings the following themes emerged:

1. concerns expressed by residents and community organizations about the quality, health and safety of private sector rental housing used for STR's.
2. concerns of stricter regulations/requirements for STR operators/hosts.
3. the emergence of short-term accommodation rentals (using on-line platforms such as Airbnb or Expedia) and the impacts on private market housing availability and affordability, as well as the land use implications such as, commercial nature of STR's, neighbourhood nuisance, property standards and maintenance.
4. the call for fair regulations to even the playing field that are currently in place for licensed and appropriately zoned hotels, motels and traditional bed and breakfasts.
5. confusion regarding the existing provincial licensing process and municipal approval requirements.

Public feedback from these scenarios and staff's proposed recommendation have been collected and incorporated into the overall public summary below.

Public Feedback Summary

Residents were provided until November 19th, 2021, to provide additional feedback on the proposed regulations. Prior to this staff received additional feedback on various STR regulatory frameworks (scenarios 1 to 5) from residents before and after the first public meeting held in May 2021. Since the public provided feedback on regulatory options during both public meetings, staff has collected and categorized the public responses into three categories, those that agreed/disagreed with the proposed regulations (scenario 1) and feedback that sought for alternative regulations. During the November public meeting seventeen (17) residents spoke in favour of the proposed regulatory framework (scenario 1), while approximately nine (9) residents spoke in opposition of the regulations proposed by staff.

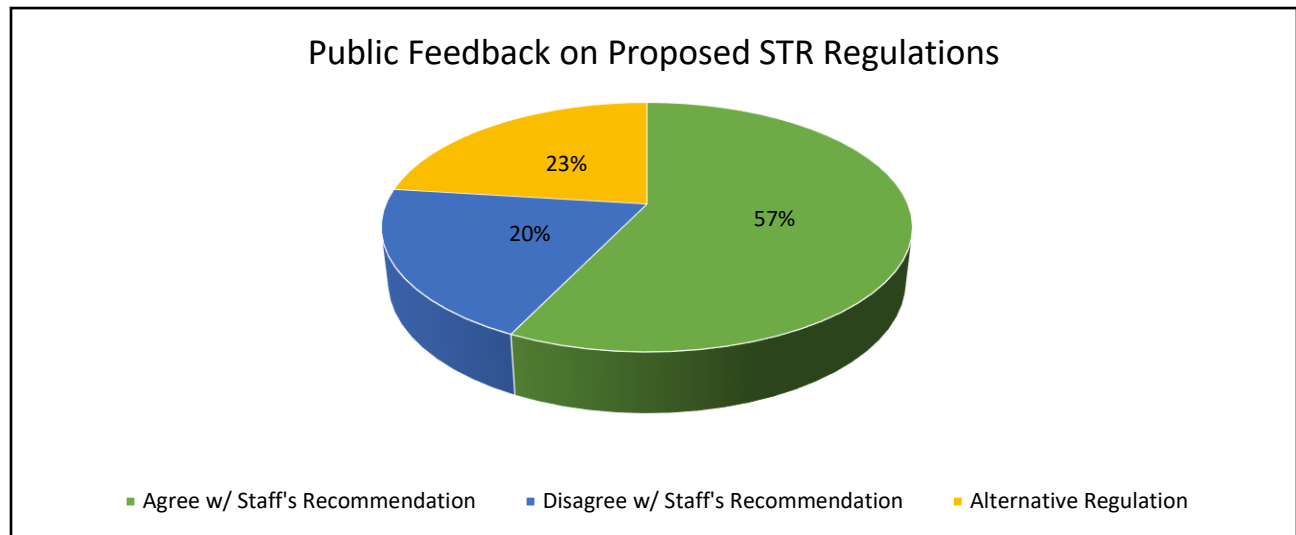


Figure 1. Public Feedback on the Planning & Heritage Department's Recommendation

Based on the public feedback that was collected throughout the public consultation process shows that many residents are in favour of staff's recommendation with approximately 57% of public feedback expressing support (see **Figure 1**). While 23% of public feedback expressed support for alternative regulations/scenarios that ranged from including apartments (scenario 2) to allowing commercial STR's in commercial zones (scenario 5). Finally, approximately 20% of the feedback received by staff expressed opposition to the proposed regulatory framework (see **Attachment H**).

Petitions

The Planning & Heritage Department received copies of two (2) petitions, one in favour of staff's recommendation and one that was opposed. The petition in support of either Scenario 1 (i.e. staff's recommendation) or Scenario 2 (permits the STR of apartments) submitted on behalf of PEI Fight for Affordable Housing contains a total of 920 signatures of which 611 signatures are from Charlottetown residents. The petition that opposes staff's recommendation was supported by 50 STR operators and was sent to the mayor and members of Council. Both petitions can be referenced in **Attachment K**.

City of Charlottetown Affordable Housing Advisory Committee

The Affordable Housing Advisory Committee that provides input to council on matters relating to affordable housing passed the following motion on October 19, 2021:

The Affordable Housing Advisory Committee fully supports Council's adoption of a Short-Term Rental Bylaw based on the McGill study's Option One (principal residence only, no apartments). CARRIED

The committee based its recommendation on the low vacancy rate and lack of long-term housing rental options.

CONCLUSION:

The Planning & Heritage Department recommends that the proposed amendments as follows:

Official Plan amendments pertaining to:

- Section 3.2 Sustaining Charlottetown's Neighbourhoods; and
- Section 4.5 Supporting Home Occupations.

and the Zoning & Development By-law amendments pertaining to:

- Section 5.6 Secondary Suites;
- Section 5.7 Garden Suites;
- Section 5.11 Tourist Accommodations on Residential Properties;
- Section 43.1 Parking Space Standards;
- Appendix A. Definitions.

be approved.

Once Council provides direction on regulating Short-term Rentals (STR's), staff will return with all the supporting regulatory documentation (i.e. Enforcement and Summary Proceedings and an STR Registration By-laws) to implement council's direction including a proposed date when all by-law amendments will be in force and effect.

PRESENTER:



Robert Zilke, MPlan, RPP
Planner II

MANAGER:



Alex Forbes, MBA, RPP
Manager of Planning & Heritage

Attachment A

Add the following subsection policy point to Section 3.2 Sustaining Charlottetown's Neighbourhoods, specifically subsection 3.2.2 as follows:

3. Our **objective** is to support the provision of suitable commercial and institutional needs, employment opportunities, community-based services, and public realm amenities within neighbourhoods.
 - Our **policy** shall be to allow small-scale commercial and institutional development which serves the local needs of the neighbourhood, subject to the City's development regulations.
 - Our **policy** shall be to allow home-based businesses and bed & breakfast establishments endorsed by Council, within all neighbourhoods subject to acceptable controls through development regulations.
 - Our **policy** shall be to encourage the provision of infrastructure within all neighbourhoods which supports economic activity arising from new technology and economic trends.
 - Our **policy** shall be to work with our partners to promote the delivery of appropriate community-based services within each neighbourhood.
 - Our **policy** shall be to work with residents of existing neighbourhoods to provide appropriate local public realm amenities.
 - Our **policy** shall be to ensure that developers of new subdivisions provide local public realm amenities which are in keeping with the size and scale of the development.
 - *Our **policy** shall be to ensure that a short-term rental operation in a residential area shall be restricted to the operator/host's principal residence and be of a scale that is compatible with the character of the surrounding neighbourhood.*

Attachment A:

Amendments to the Official Plan Section 3.2
Sustaining Charlottetown's Neighbourhoods
File: PLAN-2022-04-JAN-



Attachment B

Add the following subsection policy point to Section 4.5 Supporting Home Occupations, specifically subsection 4.5.2 as follows:

2. Our **objective** is to support the creation and operation of bed & breakfast and tourist home establishments in all residential zones.
 - Our **policy** shall be to allow unobtrusive bed & breakfast and tourist home establishments in all residential zones, subject to all other applicable land-use and development regulations.
 - Our **policy** shall be to require that all operators of bed & breakfast and tourist home establishments reside in those premises.
 - *Our **policy** shall be to require that all operators of bed & breakfast and tourist home establishments be registered and licensed by both the Province and the City of Charlottetown.*

Attachment B:
Amendments to the Official Plan Section 4.5
Supporting Home Occupations
File: PLAN-2022-04-JAN-



CHARLOTTETOWN
Planning & Heritage Department

Attachment C

Amend subsection 5.6.1 (g) under Section 5.6 SECONDARY SUITES as follows:

5.6.1 One (1) Secondary Suite may be permitted in a Single-detached Dwelling subject to the following conditions:

g. Can be used as a short-term rental under the condition that the operator/host must be present in the principal dwelling unit during the time of stay.

Attachment C:
Amendment for SECONDARY SUITES
File: PLAN-2022-04-JAN-


CHARLOTTETOWN
Planning & Heritage Department

Attachment D

Amend subsection 5.7.2 (i) under Section 5.7 GARDEN SUITES as follows:

5.7.2 The Garden Suite shall be subject to the following conditions:

i. Can be used as a short-term rental under the condition that the operator/host must be present in the principal dwelling unit during the time of stay.

Attachment D:
Amendment for GARDEN SUITES
File: PLAN-2022-04-JAN-


CHARLOTTETOWN
Planning & Heritage Department

Attachment E

Amend subsection 5.11.1 of Section 5.11 TOURIST ACCOMMODATIONS ON RESIDENTIAL PROPERTIES by adding *heritage inn* and *hostel* after *bed and breakfast* as follows:

5.11.1 Tourist Accommodations, such as a bed and breakfast, *heritage inn*, *hostel* or tourist home are a permitted Home Occupation, subject to the following requirements:

Insert subsection 5.11.4 under Section 5.11 TOURIST ACCOMMODATIONS ON RESIDENTIAL PROPERTIES as follows:

5.11.4 A Tourist Home is a type of Home Occupation and permitted in any residential zone, subject to the following requirements:

- a. Permitted in any type of *Dwelling Unit*, except an *Apartment Dwelling*;
- b. Must be the *Principal Residence* of the operator/host;
- c. A maximum of four (4) bedrooms in the *Dwelling Unit* can be dedicated to the operation;
- d. No kitchen and/or cooking appliances are permitted in a guest room;
- e. No more than one *booking* may be permitted for short-term rental lodging in each *Dwelling Unit* at one time;
- f. The operator/host does not have to be present at time of stay if the entire dwelling unit is rented;
- g. Permitted in a secondary or garden suite with the condition that the operator/host is present in the *Principle Residence* during the time of stay; and
- h. Parking shall be subject to the parking regulations of this by-law.

Attachment E:

Amendment to the Tourist Accommodations
on Residential Properties
File: PLAN-2022-04-JAN-



Attachment F

Section 44.1 PARKING SPACE STANDARDS is amended as follows:

Amend “Tourist Accommodations, Lodging House” by separating the uses and inserting “Lodging House” between “Library” and “Marijuana Production Facility”; and
Insert “Tourist Accommodation: Bed & Breakfast, Heritage Inn, Hostel” and “Tourist Accommodation: Tourist Home” under Use between “Theatre” and “University or college” amended as follows:

Use	Minimum Required Parking Spaces
Auditorium, arena, hall, stadium, Recreation and Fitness Centers and other places of public assembly	Where there are fixed seats, 1 space for every 5 seats or 3 m (9.8 ft) of bench space; where there are no fixed seats, 1 space for every 19 sq. m (204.5 ft)
Bed & Breakfast or Heritage Inn	1 space per 2 bedrooms or guest rooms
Business Office, Retail Store, retail service shop	2 spaces for the first 23.2 sq. m (250 sq ft) of <i>Floor Area</i> plus 1 additional space for each additional 25 sq. m (269.1 sq ft) of <i>Floor Area</i> .
Library	Minimum of 10 <i>Parking Spaces</i> or 1 space per 93 sq.m (1,000 sq ft) of <i>Floor Area</i> , whichever is greater
Lodging House	1 space per 3 bedrooms or guest rooms
Marijuana Production Facility	1 space per 200 sq. m (2,152.8 sq.ft.) of Floor area or 1 space per employee per shift, whichever is greater.
Theatre	1 space per 5 seats
Tourist Accommodations: Bed & Breakfast, Heritage Inn, Hostel	1 space per 3 bedrooms or guest rooms, plus 1 space for the operator/proprietor.
Tourist Accommodation: Tourist Home	2 spaces minimum.
University or college	1 space for each staff <i>person</i> plus 6 spaces per teaching classroom

Attachment F:
Amendments to Parking
File: PLAN-2022-04-JAN-


CHARLOTTETOWN
Planning & Heritage Department

Attachment G

Appendix A. Definitions are amended as follows:

Booking means a confirmed reservation of the dwelling unit or portion thereof, up to a maximum of four (4) bedrooms, as a Short-term Rental lodging.

Principal Residence means:

- a. the residential unit that is owned or rented by a natural person, alone or with others, where the natural person is ordinarily resident and makes their home and conducts their daily affairs, including, without limitation, paying bills and receiving documentation related to identification, taxation, and insurance purposes, driver's licenses, income tax returns, medical plan documentation, vehicle registration and voter registration; or similar information; and
- b. where the natural person has no other property designated as such within the City of Charlottetown or any other jurisdiction.

Short-term Rental means the rental of an entire dwelling unit or a portion of a dwelling unit that serves as the operator/host's principal residence for a period of less than 28 consecutive days and defined as a permitted use by way of a *Tourist Home*.

Tourist Accommodation means temporary accommodations for travelers or transients within a Dwelling Unit for the exclusive use of one (1) guest and their party of guests, such as a Bed & Breakfast, Heritage Inn or Hostel or a Tourist Home, but a Hotel and Motel are separate uses and separately defined.

Tourist Home means temporary accommodations for travelers or transients within a Principal Residence of the operator/host that is not a company or corporation for the exclusive use of one (1) guest and their party of guests, such as a Short-term rental lodging but a Bed & Breakfast, Hostel, and Hotel are separate uses and separately defined.

Attachment G:

Amendments to Appendix A. Definitions
File: PLAN-2022-04-JAN-



Planning & Heritage Department

Public Feedback – Alternative Regulations

My name is Alexandra Sorensen and I am a student at UPEI who lives in Ward 4. I was in attendance at the meeting on short term rental regulations on Monday.

As a student who will be graduating from UPEI next year, I have come to the conclusion that I will not be able to stay on PEI after I graduate due to the lack of affordable housing opportunities in Charlottetown. As much as I love Prince Edward Island, I am extremely disappointed with the lack of regard the city council has towards the regulation of short term rentals on the Island. The growth of STR's has accounted for the increase of rental costs by around 37.7% since 2017. This is unacceptable.

An ad campaign was run last year in Charlottetown encouraging young people to stay on the island to work instead of moving elsewhere to get a job. If you want this to be possible for us, we need more affordable housing available for us to want to stay. If not, we will move elsewhere.

I am in support of Scenario 2, as commercial short term rentals are causing the most harm to the housing market. Please consider taking the approach of Scenario 2, which will positively influence the chance of young people such as myself to be able to afford to stay on PEI.

Thank you for your time

I would like to propose that the tourist Accommodation: Tourist Home: have 1 off street parking. To accommodate for homes such as mine which are 4 units house that blends in lovely with the heritage homes of downtown. Considering there is overnight parking at the Pownal parking which is 200 meters from my place. I thank you for looking into regulating such houses that are not primary occupant owned as I do live downtown most of the time and use STR to help pay for my mortgage which is approximately 70% of my monthly pay check. I look forward to the roll out of the new by-laws.

Regards,

Amanda

I hope this note finds you well. On behalf of our host community I want to thank you for your leadership throughout the COVID-19 pandemic. Airbnb and our hosts don't oppose regulation, but limits like those being considered by council will harm your city's economic recovery and the livelihoods of many individuals who love to host guests in their homes. We would be very happy to discuss national best practices and standards for regulation with you and your team. Once passed, we'll also be happy to work with city administration to support host education and compliance awareness. The reality in Charlottetown is that the host community is small and aside from a very small number of hosts, the vast majority operate one listing. I would be happy to share more data with you on a call or zoom meeting. With regard to the report, there

are a number of simply factual errors in the analysis. I understand that housing is a concern, as it is across Canada. There is now ample evidence that limiting short-term rentals has no impact on the housing market. In Toronto, a recently implemented bylaw caused the removal of well over 15,000 short-term rental units in the city as of January 8, 2021. Due to the pandemic and its associated impacts, rents began to decrease in Toronto in March 2020 and continued to drop from March to September before plateauing at a lower level. The year over year decrease in rental prices from the pandemic continued into 2021 after the short-term rental regulations came into effect but began to increase again as early as February of this year. According to a study cited in several news stories, rent prices began increasing in February and according to padmapper "[Toronto](#) saw both bedroom types increase in price as well with one-bedroom rent growing 2.3% to \$1,790 and two-bedrooms inching up 0.4% to \$2,310." **If there has ever been clear evidence that there is little to no impact on the housing market it is this very real case study.** Furthermore, the limit on Hosting in the very few "apartment dwellings" listed on the platform in your city is simply unfair and discriminates against some hosts for no apparent reasons. A better approach for Charlottetown would be to create a registration system and a good neighbour policy. This would allow city bylaw officials to know the locations of short-term rentals and cancel the registration of non-compliant hosts who break bylaws or cause community disturbances. Airbnb would welcome the opportunity to work with the city but the framework will limit the earning potential of regular people who count on short-term rentals to support their livelihoods.

We look forward to discussing this further with you.

Thank you,

Nathan Rotman



I am writing to raise some points that I hope Charlottetown City Council will take into account when considering, amending or creating regulations regarding Short-Term Rentals in Charlottetown. I lived in Charlottetown from 1995-2005, working as a music teacher in the Western School Board, and as a freelance musician. I bought my house at 320 Fitzroy Street during that time, and still own it today. When I moved to Dartmouth in 2005, for marriage and work opportunities, I rented out my house to long-term tenants. However, as my family and I have spent our summers (every July and August) on PEI since 2008, we wanted to and now use our house during that time. I also travel to PEI about once a month from September-June each year to play in various music groups (including PEI Symphony) and to visit friends and family, and PEI itself, which I consider my true home.

I was present via video at the recent meeting at the Confederation Centre, and had a chance to express my perspective there, and would like to restate and expand on some of my points. I certainly agree that it's important that there be affordable, good-quality housing for all in Charlottetown. I would like to be part of the solution to this problem. I feel that with well-thought-out, enforced regulations, STRs can make a positive contribution to the economy, the community and generate fees to help finance affordable, good-quality housing for all. This was a point raised by Joe Byrne, which I completely support. I have been using Airbnb to rent out my Charlottetown house so that my family and I can use it when I visit frequently throughout the year, and every summer. My upstairs unit is available for rent from September-December, and January-June each year, so it is available to be rented by students. It is near Holland College.

In addition to my primary residence in Dartmouth, I own just that one PEI property, which was my primary residence when I lived on PEI, and which I now live in about 3 months per year. Financially, I am close to just breaking even with income from renting it out, and what I pay to maintain and renovate it. I take pride in keeping it in great condition, and in fact won a Heritage Award with Paul Coles (recipient of many such awards) for work done on it. I am now a single parent, as well as a part-time semi-professional musician, and income from my PEI house helps me to pay my expenses and support my family. I do not receive any child support and share custody of my two school-age children.

I agree that it's extremely important for Short-Term Landlords to be community minded and responsible to their neighbours. I have rules for my guests that include limitations to noise (none after 10pm), no parties or events, and clear and enforced waste sorting rules. I have received no complaints from any of my neighbours. I am careful to rent to people who will respect my home and those living nearby. Over many years of renting long term, I have had much more damage, disrespectful and disruptive behaviour from longterm tenants than from short term guests, who are overwhelmingly wonderful to host. I pay a living wage (\$25 per hour) to several part-time employees, who keep my home, including the yard, garden and driveway, in great shape and looking terrific. I also make use of local goods and services providers to keep my home running well. It's good for my small business, as well as for my family when we live there. I've provided a very good service to people coming to PEI for work, school, family, friends and tourism, who need an affordable, comfortable, private place to self-isolate for 2 weeks or longer that includes a deck, yard and a place to do their own laundry.

"Short term rentals give consumers more options than the few hotels and motels in the area. It is easier to find private homes that are handicap accessible or are child-friendly than a budget hotel with the same designations. And you could stay in a private home by the lake rather than the only motel by the water. The increase in supply for travelers [has] led to a moderate lowering of accommodation costs for travelers." (Tamara Wilhite, "**Short Term Rentals – the Pros, the Cons and the Ugly Debate over STRs**" discover.hubpages.com, May 29, 2021)

I feel that if Airbnb and other STR owners are well regulated, to make sure they do not allow any kind of disruptive activity by their tenants, they can be a positive part of the local economy and neighbourhood. STRs offer a personal, home-like connection with a wide variety of types of accommodations for every type of traveller to the Island, and are an attractive feature of our overall tourism picture. A city without STRs will be of less interest to many travellers. There may be hotel and cottage business owners who want to discourage the competition of small businesses like STRs, but I would argue that healthy, responsible competition is an important part of any kind of evolving business model, and with proper regulation to prevent exploitation, it can lead to innovation, better services, and economic health for all.

At the meeting, statistics were quoted indicating that over 300 homes in central Charlottetown are currently STRs. The implication seemed to be that if they were no longer allowed to be operated as STRs, then somehow they would be available for long term rental. However, that is not necessarily a cause and effect relationship. Many of those homes would likely be sold, and available rentals might not be significantly increased.

“Those who hope to ban short-term rentals think a ban will result in all STRs hitting the market. One article hoped that this would result in a resolution to the housing affordability crisis, though that is unlikely. As of this writing, only 1% of those surveyed had converted short-term rental properties into long-term rentals. Possibly more units were sold by current owners to larger property management firms.” (Tamara Wilhite, **“Short Term Rentals – the Pros, the Cons and the Ugly Debate over STRs”** discover.hubpages.com May 29, 2021)

STRs, and all housing, are part of a much larger economic picture that includes planned responses to increased immigration (which has brought an exciting new vibrancy to the Island and is so important to encourage and support), appropriate levels of taxation (including fees on STRs) used to support the creation and maintenance of affordable good-quality housing for all, and an accounting of the financial benefits that this type of small business brings to a region in terms of attracting visitors and providing employment (labour, goods and services).

I thank you for the opportunity to express my perspective, and I hope and trust that all levels of government will carefully study all aspects of this issue before making and implementing changes to existing regulations.

Sincerely,

Amanda Mark

I am writing this email regarding recent conversations/meetings about Short Term Rentals in Charlottetown, PEI. First, I would like to speak as a business owner, who works closely with STR owners and operators. Over the last 10 years, my cleaning business has been involved with STR's, and they are a huge part of my overall business income. Right now, I currently employ 5 people, and in the summer months; May Oct/Nov, we have up to 10. We rely on this business partnership; it is our livelihood. It's how we pay our rent, our bills and put food on the table. If they are shut down, or regulated so heavily, the outcome for us is simply that we would be at

risk of losing our employment. Second, I would like to speak on a more personal note. In late 2020 I lost my home and everything I owned in a fire. In a matter of hours, I was homeless, with nothing but the clothes on my back. You may think I am exaggerating; I wish I was. It was at that time, the very people we are threatening to shut down, stood up, when many “landlords” would not. They opened their doors to offer something that we simply couldn’t find at the time. I’ll never forget that, and I’m not the only one.

STR's play a key role in our tourism industry, there is no doubt in my mind. They have become an expectation amongst travellers world wide, when they are planning their destinations. I ask that you strongly consider grandfathering all existing, licensed STR's, with any new bylaws that may be developed. Your time has been appreciated.

April Clow

As long-term property owners in Charlottetown we want to share our position regarding the current discussion and upcoming vote on Short Term Rental Regulations as part of the proposed Official Plan amendments.

Background: We own and manage seven LTR apartments in two large heritage homes (triplex and quadraplex) in downtown Charlottetown. As such, we have considerable understanding of the nature of LTRs in the city centre over many decades. Including the costs associated with upkeep and rent control making it difficult to keep up with inflation and maintenance costs of older buildings. For the past 10 years we have also operated a seasonal STR outside of Charlottetown. Consequently, we are well positioned to understand the differences between the two markets: one for permanent residents, the other for visitors. We believe both can co-exist in the City of Charlottetown. The provision of a range of options for renters and visitors will help to maintain and improve the City’s character, vibrancy and appeal for everyone.

The nature of STR guests: There seems to be a general misconception that with all STRs comes rowdy behavior that disrupts communities. We believe that if properly regulated and licensed this need not be the case. In our experience, the typical STR guests are often: respectful middle-aged travellers, interested in longer stays (1-2 weeks), wanting to prepare some meals at home, and have more space in quiet settings allowing for an experience to better understand the community and its’ history. Since COVID, another dimension has been the need to have more space, and feel safe from a health perspective. These guests are not necessarily interested in a B&B or hotel option given their longer stays. Monies that might have been expended on hotels or B&Bs are more evenly distributed around the community to other businesses. STR guests generally do not want to be in the same building as property owners as they are often looking for privacy and an opportunity to discover the city and province on their own. These guests are

substantial contributors to the tourism economy of the City and efforts need to be taken to seriously consider their interests.

Important considerations for the new STR regulations: The proposed STR Regulations need to strike a better balance for all. There needs to be recognition that **not all affordable housing challenges in the City can be solved by limiting STRs in favour of LTRs**. As currently drafted the STR regulations will limit the City's potential tourism revenue. Not all visitors are interested in staying in hotels or B&Bs and appreciate the privacy and housekeeping benefits offered by STRs. If STRs are not readily available visitors will stay outside of the City and potential revenue to Charlottetown businesses will be lost.

It is our opinion, that if properly managed, with an easily accessible property manager, **we see no reason why the property owners need be resident in the same dwelling as an STR unit**.

Property owners do not necessarily want to live amongst their guests or tenants so that they can create a separation between their business and private lives. At the same time, STR guests are usually looking for privacy and consequently, why they choose this type of accommodation when travelling.

Small apartment buildings (3-4 units) should be included in the eligible list of buildings that can operate STRs. The exclusion of these types of dwellings takes out of circulation many potential STRs in Charlottetown which will not have a detrimental effect on existing neighbourhoods given their small scale. **A proposed change to the draft regulations could be the inclusion of these dwellings with a percentage of STRs to LTRs operating in a building being capped at 25-30%.** A formula of this nature will ensure that STRs do not overwhelm LTRs in a building or disproportionately disrupt the nature of a community.

We **agree that enforcement of the existing provincial licensing rules is a must**, and STR operations that have been operating outside of these licensing rules in Charlottetown need to be pursued, fined, and brought in line. Allowing those who have been operating legitimately to continue to do so. Ongoing enforcement of annual licensing and inspection, as exists with all tourism accommodations legally operating on PEI, is essential for the reputation of the industry and its' operators.

The issue of **affordable housing is a complex one that should not simply be tied to the regulation of STRs as this will not provide the required increase in affordable housing stock** in the City. There needs to be greater focus on increasing the affordable housing inventory for permanent residents. This includes a **focus on ensuring that any new builds allocate an appropriate percentage of their buildings to affordable housing units**. It should not be assumed that this challenge can be solved with the existing housing stock that is often costly to maintain.

Views and business experience of property owners need to be better understood:

Some of the perspectives shared by affordable housing advocates at the public meetings are ill founded, as no one is getting wealthy on the rental of LTRs in the heritage sector of downtown Charlottetown given rent control and the cost of building upkeep. It is also unrealistic to assume that if LTRs do not work for property owners they can easily sell. The reality is these properties are costly to maintain, have slim margins, and are often not attractive risks for commercial lenders. Consequently, it is often a labour of love that keeps property owners in the rental business in Charlottetown. We are motivated by maintaining the built history and heritage aesthetic of the City.

Despite concerns, STRs can provide a viable vehicle to support LTRs. In our situation, we have long-term tenants that have been in place for 10 to 30 years, consequently upgrading and increasing rents is not possible unless a percentage of the property can be made into an STR to provide some additional operating capital. From our experience in the STR business it is possible to do so in a responsible manner with no disruption to the character of a neighbourhood. It takes responsible and engaged owners following regulations and enforcing rental accommodation guidelines to succeed.

Conclusion: Thank you for the opportunity to share our perspective. We believe the public meetings have not adequately reflected the position of property owners and have become a platform for the vocal housing lobby which has captured the majority of public attention in this debate. We believe the interests of STRs and affordable housing are not mutually exclusive and can co-exist if a balance is struck for the benefit of all. Solutions to affordable housing are complex and will not occur by simply limiting the operation of STRs in the City. There needs to be more focused initiatives addressing the affordable housing issue. One group need not be supported at the cost of another.

For four generations our family has operated businesses, and been property and homeowners in the City of Charlottetown. We have, and continue to, contribute considerably to the tax base of the City. We are active and vested members of the community and have a serious interest in the preservation of the heritage character and attractiveness of the City and its future for all residents and visitors alike.

We urge you to reject the STR regulations as drafted and amend them in a manner that supports a more fair and balanced approach to planning and business in Charlottetown.

Supporting business and property owners to manage and succeed with their operations will provide the stimulus necessary to create a more dynamic, successful and inviting city in which to live and visit.

Yours sincerely,

Carolyn, Cynthia and Chris Cudmore

I am emailing today to express my support for Scenario 2 regarding the proposed regulation for short-term rentals in Charlottetown. As Charlottetown continues to lack housing for residents, I

believe a scenario that increases long-term housing and protects existing, long-term housing in our community is priority.

As Dr. David Wachsmuth's research on short-term rentals discovered, STRs in Charlottetown "took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the Summertime which is a 8.9% increase in loss from the previous year." His research also showed that "growth of STR's has contributed to an increase in rental costs of approximately 37.7% in 2017." This makes "STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter."

A properly planned, implemented and enforced regulation scheme for STRs is vital to the sustainability of our community. Homes are for people not profit. Now that you have seen the research on the impact of STRs on city affordability and housing supply I hope you make the decision to allow STRs in principal residences only.

We have voted for our councillors to represent community members, so please advocate for us on this topic.

Signed,
Corey Snoek

Submission to Charlottetown Short Term Rental Review by Gavin and Ami Seymour

Introduction

Thank you for the opportunity to comment on the proposed changes to short term rentals (STRs). Having been overseas for the past few years and unable to return to PEI due to international Covid restrictions, I was disappointed at the lack of targeted consultation about this matter. I was only recently made aware of it, and disappointed that the City of Charlottetown did not consult through a wider range of forums, including direct communication with currently licensed short-term rental operators.

Technical Background Report and consultation

I have now read through both the McGill report and the Technical Background Report. The McGill report, while containing some interesting data, is too limited in scope to adequately inform the policy position. It is silent on other matters impacting affordability (e.g interest rates, Covid), and does not consider any flow-on impacts of the proposed regulation beyond analyses on availability. There is no analysis on other impacts or benefits of STRs, particularly the impact on the Tourism industry. The PEI Tourism website states that tourism provides 8,782 (2019) full time equivalent jobs for Islanders. Tourism accounts for 6.2% of PEI's total GDP. Any analysis on short-term rentals must include a detailed consideration of tourism impacts.

Secondly, on reading the Technical Background Report, the paper seems to be a biased one-sided defence of a pre-determined decision. There is no balanced exploration of market failure that is necessitating regulatory intervention. There is limited exploration of both sides of the issue. Nor is there any consideration on the regulatory impact of the proposed bylaws on PEI and Charlottetown tourism, local businesses, and the current owners and operators of short-term rentals. Two of the guiding principles outlined in the Presentation of March 2020

(Support tourism industry and enable supplementary income and property rights) appear to be sidelined in most of the material.

Before introducing regulations that impact tourism and tourist accommodation, the City should undertake a detailed analysis that covers all aspects related to the proposal. It should be in conjunction with Tourism PEI, to ensure the tourism industry is not adversely affected by this proposal. I would recommend it be led by an independent taskforce, that considers the negative and positive influence of STRs on Charlottetown and PEI and provides balanced recommendations.

For comparison of what I consider to be a thorough assessment of the impacts of the sharing economy on industry and the community, I recommend the City of Charlottetown look at the work undertaken in Australia related to rideshare reform, in terms of an open discussion paper by a taskforce led by an independent academic expert, followed by extensive consultation, resulting in a detailed recommendation paper which included the reasons driving the reform, compliance and enforcement factors, and transition (including compensation for those negatively impacted). What is proposed may have real and significant negative consequences on a large number of people, and should not be delivered without sufficient examination, consideration of the impacts, and compensation.

Links:

<https://www.transport.nsw.gov.au/projects/programs/point-to-point-transport/point-to-point-about-reform-process-since-2015>

<https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/discussion-paper.pdf>

<https://www.transport.nsw.gov.au/sites/default/files/media/documents/2017/point-to-point-transport-taskforce-report-to-minister.pdf>

There are a number of aspects about the proposals that I wish to comment on. I'd be happy to be contacted to follow up on any matters raised below.

Duplication of regulation and licensing

I support the clear and consistent regulation and licensing of STRs. Licensing is currently managed by the Province and I don't understand the need for both City and Provincial licensing. This seems like unnecessary red tape with limited benefit, will be confusing, and duplicative.

Many of the issues identified appeared to be related to unlicensed or unapproved STRs. The City should work with the Province on ways it can support reducing non-compliance.

Safety

I believe that safety is an important consideration. Licensed STRs already get inspected for safety and amenity by the Province as part of its annual tourism operator licence. I don't see the benefit of an additional building permit by the City.

Option: A requirement that ensures the protection of occupant safety could be that all short-term rentals provide proof of insurance, including third party coverage, as part of the Provincial registration process.

Restriction of STRs to "primary residences"

Only allowing STRs in primary residences is too restrictive and does not consider the full span of individual circumstances. For example, operating a property as an STR is a viable option for people who currently live away, but return regularly to stay at their property when in Charlottetown.

If the intention is to limit the number of STRs while also respecting property rights and encouraging supplementary income, perhaps the restriction could be that any owner/operator may only have one STR in Charlottetown. Alternatively, there should be an option for an exemption from the Primary residence requirement, with criteria established to allow consistent application.

Parking

I note the recommendation that all short-term rentals have parking. This is unnecessary and overly restrictive, without a clear reason why it should be mandatory. Not all houses have private parking, particularly those in downtown Charlottetown, and not all visitors need parking, therefore they can make the choice to rent a property with onsite parking or not. In our experience, there are adequate parking options in Charlottetown – we have developed our own parking map for people that show these options: unlimited and timed, paid and unpaid, on-street and parkade. We have never had issues or complaints from neighbours.

It is also unclear what is driving this requirement. If it is lack of parking for residents, I'd argue that this will have the opposite effect. Long-term rentals have access to residential parking – while short-term rentals do not. Therefore, there would be an increased demand on parking with more long-term rentals. Short-term rentals need to either access parking according to local availability or utilize paid parkades.

If non-compliance is the issue (evidence of tourists parking in residential-assigned parking areas), non-compliant people should be targeted through enforcement with fines set appropriately, rather than punishing everyone.

Resourcing enforcement

There should be no need to seek “cost recovery” from all STR operators to offset compliance costs (e.g. data scrapping software). Compliance costs should be offset by fines/penalties on non-compliant operators – Compliant operators should be rewarded, not punished. Using a transport analogy, you don’t put a fee on all drivers to cover the costs of speed cameras. You fine those who are speeding to cover the costs. The McGill paper stated that out of the 834 STR listings in Charlottetown only 265 are licensed. Those 569 unlicensed STRs should be the target of enforcement, with costs recovered from those non-compliant operators.

Availability of short-term housing

Last year, we were approached by the Charlottetown Festival to rent our STR for a period of the summer. They identified us as a licensed rental through the PEITourism website and stated at the time there was a severe lack of short-term rentals in Charlottetown and they were finding it extremely hard to find accommodation. This seems to be at odds with the position that there are too many STRs. Again, this could have a major impact on Tourism that has not been thought through.

Grandfathering

Regardless of the final bylaws introduced by the City, they should only apply to new STR operations. Grandfathering clauses should exist for existing short-term rentals, where those rentals are currently licensed by the Province. A cap on the grandfathering term could be considered – at a minimum the length of the post-regulatory monitoring period (ie at least 2 years). If a short-term rental has been operating without the required approvals and licences, grandfathering should not apply.

Compensation

If bylaws are passed that negatively affect a large number of currently licensed operators, compensation should be considered. This is typical in any regulatory change that financially impacts members of the community who have made investment decisions based on current laws.

Scenarios

Five scenarios are proposed, but there would seem to be a range of other options. I would support an expansion of Scenario 5, which would factor in other relevant areas within Charlottetown where STRs would also be appropriate, mainly, the Downtown Neighbourhood zone (or south of Euston).

Timing

As mentioned, Covid impacts have been felt world-wide, particularly in the tourist industry. It has restricted my family’s ability to get back to PEI and also restricted our capacity to make an income

through our validly-licensed property. I feel like these reforms are poorly timed, potentially negatively impacting the tourism industry that desperately needs to bounce back.

I have decided not to attend tomorrow night's meeting but would like to submit comment on the City's upcoming decision on STR regulations. For the record, I am a professional planner, and a resident and property owner (tax payer) in Charlottetown. I have many friends and family who own and operate STRs across PEI, including some in Charlottetown, and in pre-covid times, I was a regular user of STRs in other jurisdictions. From what I can tell from my records, those locations where I have rented an STR in the past have been regulated and the appropriate taxes were charged directly at the point-of-sale on the AirBnB/VRBO websites.

In short, my opinion is that STRs as a land-use are not entirely bad, but left unregulated they have had an irreversible impact on Charlottetown's housing availability and affordability.

No land use should be left unregulated, without planning, oversight, applicable taxation or without public safety considerations in place.

My recommendations (for what their worth) for your Planning Board and the City's Council is that STRs should:

- be required to register with the province under the provincial legislation (this is already required but is not enforced);
- be required to meet all NBC and NFC regulations applicable for tourist accommodations. This would require a development permit and site inspection. It continues to baffle me that more people are not asking, if a tourist gets hurt, did the owner have appropriate insurance coverage and if not, who was responsible for allowing the unit to operate?
- be permitted in a secondary suite of a dwelling that is otherwise owner-occupied (this provides a source of income that supports increased home ownership);
- be permitted in a dwelling that is the primary residence of the owner for at least 6+ months of the year (i.e., at the very least this should be the location the owner is registered to vote in); AND
- pay the levy as a tourist accommodation, in parity with all other tourist accommodations in the City.

In addition, STRs operating in non-owner-occupied dwellings should:

- only be permitted within a zone that permits tourist accommodations (i.e., commercial zones) if/when they have received the appropriate development permit that reflects the actual use of the property;
- pay commercial property tax to reflect the actual use of the property; and
- charge HST as a commercial tourist accommodation.

Hope Parnham APALA CSLA MCIP

Hello Your Worship and Councillors,

I just wanted to weigh in on the proposed bylaw. I think it goes too far. Instead of not allowing any rentals other than in your own home, I think a limited number of units should be allowed. I think that is a reasonable compromise as it doesn't stifle the industry unnecessarily. I would like to hear if the proposed changes have been effective in other locations, too.

Thank you,

Ian Macdonald

I'm a resident of Charlottetown, an Airbnb host and a concerned citizen. This month, the City asked residents to weigh in on a series of short-term rental proposals. A few of the regulations being proposed would make it much harder to host and would unnecessarily restrict my ability to share my extra space. When guests stay with me they support our local economy and spend money at local restaurants and shops.

When the pandemic is behind us and travel comes back, we can play a big role in supporting our small businesses, restaurants and tourism attractions. This summer and fall, travelers from around the world will be eager to stay in our historic city and they will bring much needed revenue to our community. In addition, with so many people having the opportunity to work remotely, many may choose to rent their homes while they're away visiting family or working from another city. The city's proposal would make it much harder for residents like me to earn supplemental income.

I'm urging you to protect responsible hosts like me who open up their space to travelers and are able to make ends meet by doing so.

Jeni Mutch

I am emailing today to express my support for **Scenario 2** regarding the proposed regulation for short-term rentals in Charlottetown. As Charlottetown continues to lack housing for residents, I believe a scenario that increases long-term housing and protects existing, long-term housing in our community is priority. I attended the community consultation meeting on Monday evening and found the information shared by Mr. Zilke's reaffirmed my support for **Scenario 2**. As Dr. David Wachsmuth's research on short-term rentals discovered, STRs in Charlottetown "took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the Summertime which is an 8.9% increase in loss from the previous year." His research also showed that "growth of STR's has contributed to an increase in rental costs of approximately 37.7% in 2017." This makes "STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter." These details most definitely

highlight and stress the need for regulations that will support available and affordable housing for PEI residents. A carefully planned, implemented, and enforced regulation scheme for STRs is vital to the sustainability of our community. Homes are for people, not profit. Now that you have seen the research on the impact of STRs on city affordability and housing supply I hope you make the decision to allow STRs in principal residences only.

We have voted for our councillors to represent community members, so please advocate for us on this topic.

Jill Olscamp

My name is John Butler, and I am a homeowner and STR operator in the City of Charlottetown. I recently moved back home to Charlottetown to start my retirement. The property that I own is in Ward 2 on Esher St. (3 ½ and 5 Esher).

I purchased this property in 2014 as an investment property and to help provide for my family in retirement. From 2014 -2018 I rented this property to my daughters and their friends while they attended UPEI. Upon their graduation in 2018, I rented these properties as an Airbnb from June - Aug and as a mid-term rental from Sept – May.

Once I moved back to PEI in fall of 2019, I became aware of the City of Charlottetown's review of the Short-Term Rental (STR) issue. I was able to attend the last two public meetings that the city has held, and I would like to provide my feedback and suggestions on this issue.

The first point I would like to touch on is the issue of Affordable Housing which quickly became the main point of discussion at both public meetings I attended. I understand that affordable housing is an issue in our society today from coast to coast. This was evident during the most recent federal election where affordable housing was a key election issue. As we all know there is no easy answer to the affordable housing issue. It will require cooperation from all levels of government Federal, Provincial and Municipal. I heard many speakers at these meetings who support heavily restricting or banning STR as a solution to the housing crisis. I must strongly disagree with this. If you look at many current STR operators they have spent hundreds of thousands of dollars purchasing, renovating, and upkeeping their properties, employing cleaners, landscapers, and others to keep their properties looking nice. For people to say that these units should be forced to revert from a STR to a long-term rental to put more inventory back into the system is not realistic. For most current STR operators to do this they would need to charge rent in excess of \$1800 /month just to meet monthly expense obligations. This \$1800 would not be considered affordable housing but that is the reality of what a current STR operator would need to charge to meet their obligations. I would also like to provide you with my own recent experience of offering a medium-term rental. I posted a rental ad on PEI marketplace and Kijiji for a one-bedroom stand-alone house (garden suite). Furnished, all utilities, internet included. The ad had over 1500 hits on these sites, and I had over 40 people responding that they were interested in the rental and wanted to view the property. I set up specific times for these people

to view the property and only 6 of the 40 showed up to their scheduled appointment. This was very disappointing. It does not speak well of those supposedly seeking affordable housing. Here there was an opportunity present itself and they do not show up. I do have some suggestions other than the current restrictive staff recommendation on how the STR issue could be better regulated. The City should support people who have invested their time and finances to develop and upgrade city properties which helps not only to beautify older neighborhoods but also increases the property tax base for the city. Here are some of my suggestions:

- **All STR's** need to be registered and licensed with the PEI Dept of Tourism and the City of Ch'town. All regulations will be followed by STR operators and STR operators not adhering to these regulations will be shut down/fined.
- You could implement an ownership threshold for STR operators for example max of 4-5 units in downtown core and 1-2 in residential areas.
- As for parking, there are many STR units that have only street parking especially the downtown core. City should allow for on-street residential parking vs the recommendation of 2 parking spaces per rental
- STR operators have invested hundreds of thousands of dollars to invest in properties in the city. We have worked hard all our lives to achieve this with hope that these investments would aid in our retirement.

I understand that the STR issue is a very polarizing one, largely due to the affordable housing issue. But these two issues really are independent of one another. STR's are not the answer to the issue of affordable housing. If you force STR's to be taken off the market they will not be offered as affordable housing units, it is simply not possible to do so and make the financial obligations associated with the purchase and renovation of these properties. I hope that when you reflect on all the information and the positive impact that STR operators have made to the City in property development, increased tax base to the city and to allow more accommodations to people visiting our great City and Province that you will see the benefits and not allow the current staff recommendation to move forward. My recommendation for you to consider is scenario 3 or 4 which supports STR regulation but allows STR operators to operate with the current properties they own and manage. I appreciate your consideration in my suggestion.

John and Lynn Butler

I am a renter living in Ward 1, writing today to express my support for Scenario 2 regarding the proposed regulation for short-term rentals in Charlottetown. While I support principle resident STR operators' option to create affordable accommodations for visitors and while earning some extra income, I believe that homes and apartments that are unoccupied by principle resident operators should be banned from the STR market. Homes are for people, not profit. Our downtown communities should feel like neighbourhoods year-round, rather than ghost towns in the off-season and theme parks in the summer. A properly planned, implemented and enforced regulation scheme for STRs is vital to the sustainability of our community. I'm sure you have had many opportunities to review the research that finds STRs harm the affordability and

availability of housing in Charlottetown. I hope you decide to support Scenario 2 and allow STRs in principal residences only.

Sincerely,

Jordan Beaulieu

Good Morning Your Worship and Councillors,

Please see below a joint message from a group of concerned citizens:

I want to pass along my thoughts as a Charlottetown resident on the proposed bylaw before it goes to vote. I went through the proposal recently and was quite shocked at how far it goes and very concerned about the implications it could have on the City's economy and tourism in particular if it is enacted. In my opinion, it would be a big step backward. Airbnb and the like provide options for tourists that hotels and motels do not. Taking those options away to this extent is not good policy for a City that depends so heavily on tourism for the health of its economy. Affordable housing is an important issue that needs to be addressed, but killing this market and hurting the local economy in the process is not the answer. Continuing to build and expand the supply of housing is. Fortunately - as anyone who drives around Charlottetown can see - building is happening and will hopefully continue into the future until supply meets up with demand.

I hope that Council will see the folly in the proposal as drafted. I don't think anyone is opposed to some regulation of STRs, but this bylaw goes way too far. No need to respond, just wanted to provide my input on this important issue.

Kari MacDonald

I am the owner of a 121 year old heritage home in Charlottetown. The house has been completely renovated. For the past 17 years I have rented out this house. The rent of my house was never in the "affordable" category and I don't believe it is possible to rent a detached home with all the associated costs for an "affordable" amount. That meant that my home was rented primarily to students and small groups of people. During the 10 years I rented it out long term, my home was damaged many times and I received many complaints of noise, parking and garbage issues from neighbors. Since 2016, I have operated a licensed short term rental. I receive all requests for bookings through VRBO and communicate individually with each person that I am renting to. I allow pets. Since 2016 I have rented to over 100 groups without a single issue. No damage to my heritage home. My neighbors are very happy. I have many positive property reviews and because these groups had such a great time, they made repeat longer visits to PEI and helped support many local Island businesses and restaurants. I really have been amazed at the diverse groups of people that travel to PEI. Removing or limiting short term rentals will mean that a lot of these groups will not come. Not all visits to Charlottetown are tourism related.

I have had people stay in our short term rental, that:

- Are visiting the Atlantic Vet College and need a house (not a hotel) that allows animals
- Reuniting with family. Staying in a home allowed them much more closeness than a hotel and made it financially possible.
- People with special dietary needs that need to prepare their own food
- Funerals
- Hockey School
- Work – we have had several young people stay a month because they had short term work.
- Want to traverse the trails of PEI and need a place to store their equipment
- Are coming to Charlottetown for medical treatment.
- Are self isolating
- Are not comfortable staying in hotels
- Want to see PEI but cannot leave their pet behind.
- Are tired of the hotel scene and simply want to stay in a nice quiet home. We get lots of elderly clients who are travelling with their children.

I have had many clients tell me that if they hadn't been able to find a home in downtown Charlottetown that allowed pets, they would not have come. Not all pets can be left in a hotel.

During the pandemic, short term rentals played an important part in self-isolation requirements. As well, we had employees stay at our home who travelled to PEI to install plexiglass dividers in offices during the pandemic. Without separate dwellings such as my house, some essential services would have been impacted. I believe that there should be regulations and inspections. Restricting STR to primary homes will not solve the affordable housing crisis because it didn't cause that crisis. Immigration and under construction of affordable units did that. However, restricting STRs to primary homes will remove opportunities for families to visit during the upcoming Canada Games and if there is another pandemic or natural disaster type of situation, these places will not be an option. I believe that existing STR owners need to be grandfathered to ensure that there are opportunities for everyone to visit PEI, not just those that want to stay in hotels. People need to be encouraged to come and visit PEI and leave their car at home. Stay downtown, walk, and take public transit. Restricting STR's in Charlottetown places another limit on that. Removing fully furnished and extensively renovated houses from the short term rental market will create a new level of expensive high end rentals.

Thank you for the opportunity to have input.

Kathy Stewart

I am emailing today to express my support for **Scenario 2** regarding the proposed regulation for short-term rentals in Charlottetown. As Charlottetown continues to lack housing for residents, I believe a scenario that increases long-term housing and protects existing, long-term housing in our community is a priority. As Dr. David Wachsmuth's research on short-term rentals discovered, STRs in Charlottetown "took an average of 138 housing units off the rental market

in 2019—a number which rose to 193 during the Summertime which is a 8.9% increase in loss from the previous year.” His research also showed that “growth of STR’s has contributed to an increase in rental costs of approximately 37.7% in 2017.” This makes “STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter.”

A properly planned, implemented and enforced regulation scheme for STRs is vital to the sustainability of our community. Homes are for people not profit. Now that you have seen the research on the impact of STRs on city affordability and housing supply I hope you make the decision to allow STRs in principal residences only. We have voted for our councillors to represent community members, so please advocate for us on this topic.

Signed,
Kinley Dowling

I would like to express my support for **Scenario 2** regarding the proposed regulation for short-term rentals in Charlottetown. As a Charlottetown resident, I am deeply saddened and abhorred with the current lack of affordable housing Charlottetown has for its residents. A strategy that increases long-term housing and protects existing, long-term housing in our community is of paramount importance—which is why I am in support of Scenario 2. **I urge you all to reflect on your responsibilities to help mitigate this housing crisis that we are in, and take the right course of action to help rectify it.**

Laura Cairns

My name is Leslie Beck, I am a Charlottetown resident. I started a business in 2018 managing STR’s for homeowners. You can see my website here to get a better idea of what my company does: www.airbnbhost.ca.

I’ve been in this business since 2014 starting with a room rental in my home. I have been following along closely with the STR regulating process in Charlottetown and other cities across North America and Europe. If anyone is looking for a deeper understanding of the STR market in Charlottetown from an operator's perspective I am happy to answer any questions you may have. Feel free to give me a call or send me an email.

I am in favour of Scenario 5 and I am opposed to implementing Scenario 1.

Providing safe and adequate affordable housing in cities is an issue that has stumped governments, urban planners and economists for a very long time. There is no one size fits all answer on how to solve this issue and to date, no city has solved it perfectly. Every governing decision a city makes has ripple effects, often these effects are not anticipated or foreseen. With experts having opposing viewpoints on how to have a healthy rental market and how to

keep the cost of housing down, your task is made ever so much harder. I have great respect for you all taking this challenge on. Best of luck with your decision making. Here are my two cents:

This debate can be broken down into two main arguments for implementing this proposed bylaw. One, STR's Make Bad Neighbours and Two, This Bylaw will Provide Much-Needed Affordable Housing, Quickly. I will address these two arguments below.

STR's Make Bad Neighbours

I believe all the issues brought up by the public in this regard are valid, and fortunately, I believe they are easily solved. In most cases, the operator's and Neighbourhood Resident's interests are aligned which is why I believe there are achievable solutions. I would be happy to work with the City of Charlottetown to solve them all.

- **Licensing** - Unlicensed operators are easily found and can be fined.
- **Neighbourhoods where you no longer know your neighbours as they are all Airbnb's, and/or entire apartment units being built or purchased and transitioned into Airbnb's** - Scenario 5 prevents this from happening.
- **Parties** - Operators have a high incentive to keep parties out of their properties as they are responsible for cleaning up after their guests and they do not want their property damaged. Most operators have strict rules in their properties which, if broken, they can enforce via immediate eviction.
- **Messy Properties** - Success in this industry is driven entirely by reviews, so things like garbage on the driveway etc would make operators perform poorly. The incentive for operators to have pristine rentals is high. While I am sure it does still happen, one potential solution for the above two issues could be implementing an accountability stipulation in the licensing process. I have further ideas which I can expand on if anyone is interested.

This Bylaw will Provide Much-Needed Affordable Housing, Quickly

How much affordable housing will it provide? How quickly will it be provided? And will the benefits of the affordable housing provided outweigh the negative outcomes created by removing the STR's from the market? To answer this question, I believe the following information is required to make an informed, responsible decision:

1. What is the vacancy rate now? How many apartment units, multi-family homes and single-family homes are under construction? How many building permits have been received, how many building permits approved? Do we have information on when these will come to market? Is there any forecasting of future vacancy rates based on the units under construction?

2. What are the population growth trends for Charlottetown? How much is our population growing annually? What are the demographics of this population and what kind of housing are they requiring?
3. How many STR's will be shut down if this bylaw is passed? How much direct tax revenue is lost? How much indirect tax revenue is lost by diminished tourists visiting the Island?
4. What information has Tourism PEI provided to help make an informed decision about the impacts of closing down "x" amount of STR units? Every year I've operated I've received calls from Tourism PEI trying to arrange accommodations for visitors who have arrived on the Island with nowhere to stay (and all my properties were full). I've known of a few situations where tourists had to leave the Island and go to Moncton to find a place to stay. It would be good to know what the tourist accommodations vacancy rate is in the summer to be able to better understand the impacts of losing these accommodations.
5. It was good to hear from an expert who speaks around North America about the negative impacts of STR's in cities, Professor David Wachsmuth. He is well educated and can provide lots of information on why it is important to regulate STR's. It would have been nice to have an expert with an opposing viewpoint weigh in on this scenario as well. The numbers you are asked to make decisions on are extrapolated from models used in the US. And the information in the planning report about the impacts on tourism in Charlottetown would have benefited if an expert on tourism in PEI had weighed in on that information to see if it made sense in our particular market. New York City's tourism market is not the same as Charlottetown's. Taking these differences into consideration would be helpful for accuracy when forming numbers about the STR and tourism market in Charlottetown.
6. What will the STR's that are shut down be converted to? This information is easily obtained, and should be known. We are a small enough city/market that it should not take more than 40 hours to call the operators and find out.
7. **A Costly Decision for Local Entrepreneurs**
If this proposal is passed and STR operators are forced to divest, and the bylaw does not end up creating more affordable housing, and the quality of life for low-income residents is actually lowered due to a slowed economy, it will not be a decision that can be easily reversed without great cost to the operators. I do not believe it fair for any citizen's investments to be taken lightly, therefore I do hope that if this bylaw is passed, it is with certainty that the affordable housing market will be greatly benefited on an ongoing basis.

Scenario 5 Strikes a Good Balance

According to the modelling presented in the public meeting presentation on May 17th, 2021, Scenario 5 would create a 3% vacancy rate by 2022. A 3% vacancy rate is considered healthy.

Therefore this scenario seems to be the best option for having a healthy rental market while still maintaining a good amount of STRs.

Solutions for the Affordable Housing Crisis in Charlottetown

If these meetings have demonstrated anything they've shown that there are many vulnerable Charlottetown citizens in need of more secure housing. I am saddened to hear some of the stories that were told and I would like to see a Charlottetown where everyone's housing needs can be met. We should have public meetings to come up with creative ideas on how to address this. I have several ideas of ways we can create affordable housing while at the same time growing the economy. Let's be innovative and use all the resources at our disposal to try to figure this out. The tax revenue generated from STR's could provide very valuable funding for future government housing projects.

In closing, my feeling is that stifling a very healthy and growing revenue stream to provide a handful more housing options to residents is short-sighted. Let us not stifle this amazing opportunity to grow our economy. Let us harness this resource to build more resources, let us encourage ingenuity and create a vibrant, healthier place to live for all citizens.

Leslie Beck

Owner/Operator

My wife Sharon Rostad, and myself fell in love with this beautiful city of Charlottetown, and it's distinctive and historic "500 lots" district. For years, we always dreamed of living within this area, and in 2018 found a small piece of land to construct our home at 1 Brighton and permanently relocated here from British Columbia.

Knowing the level of tourist activity within the city core, we designed and built a new property for our principal residence, but with a seperate suite to use as a short term rental.

Living in British Columbia, we have seen downtown neighbourhoods in most jurisdictions, slowly and steadily, slide into places full of drugs, crime and dilapidated properties, putting pressure on police departments and social services available.

As properties fell into worse and worse states of repair, they were demolished to make way for other housing. If this happened in this historic city, the beauty and charm that brings people to Charlottetown would slowly be lost forever.

We feel that short term rentals have saved the 500 lot area from becoming an undesirable place to live. We feel that the upgrading of many of the historic homes within the 500 lot area

(to the City's standard of construction within the 500 lots) would not have been done to such a high calibre, if not for the return on investment that STR's provide.

At the same time, we do not see it fitting that short term tourist accommodations should be allowed within apartment buildings, nor in residential neighbourhoods outside of the city's downtown core, and taking away precious housing options for our fellow residents and their families.

It is our strong opinion is that short term rentals should:

- *Only be permitted within the 500 lot boundary*
- *Not be allowed within an apartment building*

Thank you for your time and consideration.

Mark & Sharon Rostad

Mr Mayor & Councillors,

My wife and I and a number of our neighbours are all in favour of the STR concept. However everything has its place and STR's do not belong in R1 residential neighbourhoods. At the public meeting in May 2021 we verbally presented the **attached statement**. Since that time we have been keeping our ear to the ground watching for the next meeting, speaking with neighbours, some members of council and Mr. Zilke of the planning board. We have also had the opportunity to review the August 26, 2020 document, case 22423: Regulation of Short-Term Rentals, relating to the research in Halifax regarding STR's. This document, while quite comprehensive, does not contain a draft proposal for a by-law although it does outline four alternatives for the Halifax Council to consider. On speaking with Jillian Macellan, from Halifax Planning, she indicates they have not proceeded any further although council has requested that they **survey the residents** again before drafting a by-law proposal for their consideration. The Charlottetown draft proposal dated October 4, 2021 that is to be presented to the public November 9, 2021, although a start, hopefully will not be adopted by council without considerable revision. **Also attached are a few additional comments and some suggestions.**

Attachment:

Response to Planning and Heritage Proposal Oct 4/21

- STR's are in general a good idea but require by laws and regulations and should not be permitted in R1 residential subdivisions.
- Each STR needs to be assessed and licensed by the governing body
- Each STR must have the owner or their representative (manager) on site, while renters are present or at a minimum between the hours of 7 PM & 7 AM

Planning and Heritages Proposal Oct 4/21

Recommendation

- Sustain Neighbourhoods
- Support Home Occupations

How do we sustain R1 residential neighbourhoods if we allow STR's in these areas?

One of the Canadian Dreams is to own your own home, know your neighbours and your community. Adding STR's in residential zones changes many aspects of these residential areas which attracted people there in the first place. As such we would suggest that adding STR's to R1 residential zones does not sustain residential neighborhoods.

Charlottetown hired one of the "leading experts in the STR field". This expert did the bulk of his research in large urban centers. PEI and Charlottetown are very different from large urban Canadian cities and, in fact, is a unique and special region and as such probably needs to create its own response to the STR issue. I would suggest if the City hired local researchers from one of our post-secondary institutions and canvassed the Charlottetown population about this issue you would find that the majority of home owners would be/are opposed to STR's in R1 residential locations.

At P. 2 of the Oct 4/21 proposed regulations the third sentence clearly outlines the proposals intentions where it states; "The proposed regulatory framework has been designed to provide opportunities for residents to benefit from the STR economy". We would suggest, and our research confirms, that the majority of home owners in these R1 residential subdivisions are not looking to benefit from the STR economy and furthermore would get greater benefit if their neighbours house was not an STR. Unfortunately most people are apathetic and will not say anything, if they are aware, until it directly affects them. Possibly Charlottetown should follow Halifax's example and **conduct a survey** on the issue.

The same sentence on P.2 of the city's proposed regulation goes on to say while establishing appropriate measures that minimize "the negative consequences of STR activities that impact housing, generate nuisances and disrupt community harmony". The last part of this statement says quite a bit;

- There are negative consequences (I have purposely avoided listing negative consequences however today while speaking with a senior City official my wife was told that ladies from off island are coming to Charlottetown and offering their services from some of these STR locations.)
- STR's create nuisances
- STR's disrupt community harmony

If STR's create these negative consequences how can Planning and Council contemplate allowing these negative impacts to disrupt our residential communities?

It goes without saying that Tourism is a very important part of our community and economy. Our guests need accommodations when they come to visit and spend their money, however there are many other solutions and opportunities for both entrepreneurs and visitors other than turning R1 residential communities into commercial zones.

If STR's are permitted in some areas there is a need for a regulatory framework complete with enforcement.

Some Suggestions;

- A requirement that the host/operator be trained and certified.
- The location be licensed and certified.
- Should the property owner not be present that a trained and certified agent be on site between the hours of 7 PM and 7 AM.
- Enforcement of the By-Laws, Regs & licensing requirements.

Other points to consider:

- How can the character of R1 residential subdivisions be maintained while permitting STR's?
- Transient populations, residential subdivisions presently provide a stable environment.
- Public consultation in this case may be somewhat flawed due to apathy.
- Suggest door to door survey.
- Referendum question at next municipal election
- Proposed amendments stretch the definition of home occupation.
- Proposed Official Plan Amendment suggests the notion of having STR's in residential neighbourhoods has already been determined.
- What is the definition of a secondary suite?
- Research indicates most residents in R1 zoned subdivisions have purchased in these areas because they consist of single family residential homes.
- City councilors need to survey their constituents.
- A survey such as that carried out in Halifax would indicate how residents really feel about the issue.
- Unfortunately most residents will not attend the public meeting even if they were aware of the meeting or the issue.

I am writing in response to the STR debate

My background, I purchased my house in 2010 which is located on Dorchester Str which is only 2-minute walk to culinary school. The house is a side by side duplex, I did a complete renovation in both units in 2010. I have lived on one side and the other side I have rented as long term and short-term rentals over the years. For the past 5 years I move out to my summer residence and rent out both sides as STR.

I am concerned that the recommendation that has STR only being allowed in the primary residences is too restrictive both for guests and STR owners. In my situation I feel that I should be able to use both rental units as STR as they are both under the same roof.

In my years in the STR business I find that guests no longer wish to share with the owner of the STR, they want privacy plus the comfort and coziness of the unit to themselves.

This past summer I had phone calls from the Visitor Information Centers wondering on the status of my rentals as they had tourists looking for accommodation and considering that this summer was a downturn in the tourism industry due to Covid what will happen when we are back to full on tourism. My concern is that if visitors cannot find accommodations within the STR market they will not come to PEI and any other province would be more than willing to have them visit.

The economic impact of reducing the number of STR will also be felt by the business community, many of my guests do not do any cooking, they are buying coffee, breakfast, lunch and dinners in the city which also helps employment in the city by employing servers and restaurant employees. They are shopping and taking advantage of our excellent artistic talent in the theatre and music shows.

For many young people the idea of purchasing a home is beyond their budgets but if we allow a duplex to be used as STR this would allow young people to purchase a home and use the income from STR to finance the purchase. Young people are being priced out of the housing market. STR can allow young people to get into the housing market but if home sharing is the only option it will restrict their ability to purchase in the city but if they could be renting out an auxiliary unit within their home it could be affordable for them.

Many people feel that eliminating STR will eliminate the housing crisis on PEI, but in all reality, this must be a joint effort with various levels of government and the private sector. However the housing crisis is getting better, in 2018 the rental vacancy rate was 0.2%, in 2019 was at 1.2%, in 2020 it is at 2.6% and when you consider that a number of rental units are in the process of construction or have been completed since 2020, it is very probably that the occupation rate will again double. It is many of these units that are earmarked for affordable housing. In my opinion eliminating STR from the market will not assist those that require affordable housing as many STR rental rates are well over \$1500 a month

To conclude my option would be to allow those that live in a building that houses a duplex, triplex etc. or have inlaw suites, garden units or units on the property that they be allowed to operate as a STR. As I understand this was initially an option that was released prior to the recent revisions.

Thank you for the opportunity to submit and if you have any questions feel free to reach out to me.

Regards



Phillip McInnis
27 Dorchester str
902 393 2950

In our opinion, and from what we see in other jurisdictions that have vibrant downtowns that attract people to work, live and play there needs to be a cohesive mix of services, public spaces, spaces for rent, spaces for purchase, arts, culture, a mix of housing, and Tourism accommodations. We understand council is considering new regulations for the relatively new short term rental (STR) industry and market. It is reasonable to expect that STRs be licensed, inspected, and operate with levies and the regulations that other licensed Tourism establishments must follow.

In nearly every jurisdiction across the globe, STRs (with platforms like Air BnB, VRBO and other bed and breakfasts) are part of the accommodation market for visitors. Some travelers who need or want to stay weeks or months often require more space and amenities than a regular hotel room can provide. Some travelers prefer independent locations, operated by locals who live in the market and choose this mode of accommodation versus a corporate chain. In a relatively small market like Charlottetown with only one nationally branded corporate downtown hotel - (The Delta) – provincially licensed STRs have become part of the Charlottetown tourism plant. Downtown Charlottetown doesn't have Hiltons, Sheratons, Hyatts, Crown Plazas and other major corporate flagship brands – and arguably, it's better off, featuring reputable independent Charlottetown residents offering quality places to stay. With the Charlottetown Tourism industry looking to rebound from COVID19, taking quality licensed accommodations out of the market will be a step backward. The issue of affordable housing is one that is not unique to Charlottetown or Prince Edward Island. Citizens and governments at all levels in Canada have been struggling with this issue as are, quite frankly, citizens and governments in most jurisdictions around the world. Affordable housing is a multi-faceted issue. It is our opinion that it would be fundamentally unfair to put provincially-licensed STR

owners out of business. From a policy perspective, it makes little sense to take the drastic step of putting Charlottetown and PEI residents out of the Tourism business unless it can be clearly shown that doing so would achieve an important public objective.

It would appear that most of the provincially-licensed STRs on the market are high-end, fully furnished and would rent for \$2,000 or more a month in the long term market. Forcing these 83 or so properties onto the long term market will do nothing to solve the issue of affordable housing – these units quite frankly are not affordable.

In sum, a reasonable compromise or balance must be found. In our view, this balance involves (1) requiring all STRs to be inspected and licensed by the province and/or City; (2) grandfathering existing provincially-licensed STR operators; (3) permitting existing and new STR operators to operate in zones that permit a hotel even if the STR is not owner-occupied; and (4) limiting new STR operators who are outside a hotel zone to owner-occupied units.

Respectfully, submitted,

Steve Dunne and Spencer Campbell

Philip,

It's been roughly a year since our last exchange on str regulation and given recent events I wanted to reiterate our position. My wife and I operate an Airbnb triplex on Hillsborough Square and we live on Euston Street. We are disturbed by the number of ill informed people that presents all str operators as villains that need to be regulated. Our property is surrounded by hotels and B&B's and was converted at substantial personal cost from a dilapidated group home to a 4star str. Our property was never part of the downtown housing problem yet we continue to hear a repeating theme to restrict str to owner-occupied. Should that regulation be implemented it would put us out of business.

PEI, and specifically Charlottetown, has been recognized as a top location to visit. The city should be taking advantage of that publicity by building out its tourism industry instead of considering options that would put small tourism operators such as ourselves out of business. Given the number of multi-unit projects being approved and under construction I would suggest that the housing market is already fixing an imbalance that in my opinion was caused largely by immigration. Please consider grandfathering currently registered str properties. We are entrepreneurs who live downtown so we pay commercial and residential property tax to the city. Our story is no different than many other str owners. Alienating a large group of small business owners by putting them out of business is not be in the best long term interests of the city.

Thank you for your consideration;

Steve and Nancy Godkin

We live across the street from the newly restored heritage house/duplex at 165/167 King Street in Charlottetown that is now a Short Term Rental(STR). Before the new owners had poured a major amount of thought, time, energy and money into it, it was a derelict building with very minimal attention from the previous owner. For example, the garbage was never looked after properly so we had constant problems with unwanted animals, it was in terrible shape, the place looked like it was going to fall down and be unsafe, loud drunken parties that couldn't care less about the neighbourhood, and unpleasant interactions with some of tenants that really had no care they were disturbing us all hours of the night.

We were thrilled the day 165/167 was bought by someone who saw the potential of the neglected building and had the gumption to take on the project and bring it back to its glory. And doing so it has made the streetscape of our neighbourhood look like it should. As we know very well, in order to do this kind of work on these old buildings the owners need to invest a lot of money and then need to recoup some of their investments through STR. If anything this duplex has generously contributed the ever improving streetscapes of downtown Charlottetown and made a safe beautiful place for tourists to come and enjoy. All our interactions with the STR guests have been very pleasant. We can't express how transformative these positive changes have been. Many of these new owners have restored these old gems and made our streets of downtown Charlottetown a charming and safe location for all to enjoy.

Thank you for your time

Susan and Michael Coyle

I wish to express my support for Scenario 2 regarding the proposed regulation of short-term rentals in Charlottetown. The city's current housing situation requires strong action, and the research shows that Scenario 2 will help increase the availability of long-term housing while also protecting existing long-term housing in the city.

I am a Ward 3 resident currently renting one side of a duplex on Greenfield Ave. The only reason that I was able to find this housing is because the COVID-19 pandemic forced our landlord to put her Airbnb properties back on the long-term market. I was so thrilled to find this rental and have made a home here. I have spent over a year getting to know my neighbours and establishing myself in the community here. I love walking to work and being close to all of the downtown businesses that I love to support. However, I have recently learned that this will likely no longer be my home come the end of summer. As I had feared, our landlord wants to put our unit back on Airbnb as soon as people are vaccinated and she can make more money renting out her Airbnb to tourists. My story is like many others in Charlottetown. Everyone I know has been impacted by this housing crisis in one way or another. I look around at my

friends, all extremely well-educated people who should have no trouble making a life here in Charlottetown, and yet we are all struggling to find adequate housing and pay our bills. At the age of 26 and with a well-paying job at a law firm, I will likely have no other choice than to move back in with my parents outside of town come September, with no car to get around. Housing options are either too limited or too expensive for me to find something else in Charlottetown. This reality is all too common for youth in the city. How can youth thrive in Charlottetown if we cannot find housing here?

Scenario two would directly fix this problem. Dr. Wachsmuth's research findings on the impacts of STRs are clear and it is long overdue that something is done. The problem has been identified by experts in the field, and the solution to the problem has also been identified. In order to return long-term units to the market and protect existing housing, the City must adopt Scenario 2.

Public policy-making is always a balancing act. There will always be some who are not satisfied no matter the decision that is made. However, the balance of interests here is simple: you are balancing the ability of wealthy individuals to accumulate more wealth with the ability of vulnerable residents to access safe and affordable housing. In an instance such as this, it is frankly immoral and illogical to put the same amount of weight on both ends of the scale. I am tired of our elected officials putting the same (if not more) weight on the voices of those who profit off the suffering of the residents of Charlottetown. Tourists will still come to PEI if Airbnbs are unavailable and STR owners can invest their money into other business ventures. All this to say, the impacts of Scenario 2 will be far more positive than negative. As city councillors, I know you are well aware of your role as representatives of community members. I implore you to listen to your residents and adopt Scenario 2.

Taya Nabuurs

I thought it important to send to you what I believe is a sound and fair framework for developing regulations for STR,s going forward ! I was disappointed but not surprised that most speakers at the public meeting did not at all discuss in detail any alternative options for council to consider! Please take the following into consideration.

- 1-any inspected and licensed STR in the 500 lot area or as I call it south of Euston st grandfather them in !
- 2- going forward all STR,s have to be licensed and inspected by the province, pay HST and pay the room levy !
- 3-Going forward any unlicensed property that is short terming there property must have a strong deterrent to stop !
- 4- STR,s in Residential neighborhood's are a different animal they need to be treated differently and any regulation must be much stronger !

STR,s have an important place in our city's economy and with proper regulations it can survive and be a positive addition in accommodating our many tourists!

Finally we all understand there is a huge affordable housing issue in the City so the question is how do we get units built !

Myself and others I know in the private sector I am sure would be of great assistance to be a partner with city hall in getting holes dug in the ground so please don't hesitate to ask !

Terry McKenna

I am sure you have received a few generic emails(which I am adding below) the past few days. I first want to add my true feelings on the matter.

I'm happy to say I have my own home & at this time this situation does not particularly affect my life. The key words I mention is "at this time". One day I may find myself looking for housing in the Charlottetown area & I am pretty sure I won't find one to fit my budget but also I would be lucky to even find one. Not only that but the insecurity that would be felt not knowing if I'm going to be evicted in the near future even if I had a rental due to our STRs.

Nobody should live like this!! Nobody!!!!

I seen, read & heard so many heart wrenching stories of people being put in horrible situations. My heart goes out to all of them.

When you stood on my doorstep before you were elected mayor of our beautiful city you promised that you were going to fix the Air B&B situation. I hope you stand by that promise. Scenario 4 is a joke!!!

Please do the right thing. Your city, Your people are crying out for help.

I support for **Scenario 2** regarding the proposed regulation for short-term rentals in Charlottetown. As Charlottetown continues to lack housing for residents, I believe a scenario that increases long-term housing and protects existing, long-term housing in our community is priority. As Dr. David Wachsmuth's research on short-term rentals discovered, STRs in Charlottetown "took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the Summertime which is a 8.9% increase in loss from the previous year." His research also showed that "growth of STR's has contributed to an increase in rental costs of approximately 37.7% in 2017." This makes "STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter."

A properly planned, implemented and enforced regulation scheme for STRs is vital to the sustainability of our community. Homes are for people not profit. Now that you have seen the

research on the impact of STRs on city affordability and housing supply I hope you make the decision to allow STRs in principal residences only. We have voted for our councillors to represent community members, so please advocate for the people on this topic.

Traci Mayhew

I am emailing today to express my support for Scenario 2 regarding the proposed regulation for short-term rentals in Charlottetown. As Charlottetown continues to lack housing for residents, I believe a scenario that increases long-term housing and protects existing, long-term housing in our community is priority.

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A properly planned, implemented and enforced regulation scheme for STRs is vital to the sustainability of our community. Homes are for people not profit. Now that you have seen the research on the impact of STRs on city affordability and housing supply I hope you make the decision to allow STRs in principal residences only.

We have voted for our councillors to represent community members, so please advocate for us on this topic.

Vanessa Bradley

End of comments

Public Feedback – Support Regulations

I'd like to send an email of support for the current proposed short term rental regulations for the City. I've been a pest to most of you about this issue in the past, and although I've taken some time away from my volunteer work with PEIFAH (very much enjoying maternity leave :)), I want to voice my support as a life long resident of the City, currently located in Ward 3.

I think these actions are on trend for other jurisdictions in Canada and the world for retaining housing stock in the face of a declining housing availability. Protecting and prioritizing residents and keeping homes and units within the city core as long term rentals will help workers and residents live and thrive all year round. I am opposed to grandfathering existing units. I think there is a place for short term rentals but it should be restricted to your primary residence...still gives options to those who have a summer cottage or are snow birds to be flexible on renting their homes etc.

I'm very happy living in our city and much appreciated for all the hard work done by planning staff and councilors for listening to residents. This process has been a contentious one, but am feeling so optimistic with this direction.

Aimee Power

I am emailing today to express my support of regulating short-term rentals in the City of Charlottetown. I am advocating that Council approves a regulation scheme that takes immediate action to protect existing, long-term housing in our communities. Research on this topic across the world has indicated that short term rentals have an impact on city affordability and housing supply.

I am in support of an owner-occupied regulation within the City of Charlottetown. Residents can still list their primary residence while curbing the influx of commercial rental units in our neighbourhoods.

I am in constant fear that the building I rent in will go up for sale. It is located in the 500 block which is prime real estate these days. I am seeing rental houses going up for sale weekly and being sold within days. I know it is a direct result of the lack of regulation around STR's. In its current form, it is just too profitable and too easy for investors to buy property, kick out tenants and rent on the short-term.

I voted for you because I knew you would work to protect the people, so please advocate for us on this topic.

Thank you,
Ainsley Kendrick

I am writing in regard to the call for input about the proposed plans for regulating the currently illegal short-term rental issue in Charlottetown and want to raise a larger point about community.

I have a disability that prevents me from ever being able to drive. I therefore need to live in an area that is within a short distance from daily needs. This is a basic requirement for life for many people. Walkable communities where people live near their neighbours have been the basis for civilization for as long as we can discern.

It's only recently, since World War II, that car-oriented development has taken off and warped our notion of what a community should look like. This is a temporary anomaly and will likely not be the norm for much longer given the undeniable realities of climate change.

Charlottetown, and especially downtown and the Spring Park neighbourhoods, contain the bones of a lovely, walkable community where a person could live a fine life without the need for a car.

I used the word 'bones' deliberately there, because this community is dying and our government is killing it. When you take a home, be it a house or an apartment, that could house a person or a family, and you board it up and turn it in to a vehicle for money making, say as a place to grow illegal drugs, or rent to tourists for a few weeks a year, you are wounding the community and depriving it of the only thing that matters - people.

A community that is more and more made up of empty houses used by their owners as a means to earn money while they don't themselves often even live here, is a dying community.

Disabled people who can't drive, and people who would rather live a car-free lifestyle either out of financial need or preference, need a real community to live in. If we build apartment blocks far from downtown that are only accessible by transit once an hour, that is not an adequate solution while perfectly wonderful homes sit empty.

Communities are for people, please let Charlottetown breathe and grow again by putting the people first.

I urge you to consider people who live here or who want to stay here but realistically can't right now, and choose either option 1 or option 2 and limit short term rentals to owner-occupied only. Those operators are not damaging their communities and are perfectly free to rent out their own rooms as the services originally intended. .

If you would like to talk further I welcome the chance to talk about this constructively.

Alexander O'Neill

Firstly, I would like to express my appreciation to the department for providing a public meeting, live streamed and video and a copy of the presentation for later viewing. I am most appreciative of the fact that about 4 days were provided to allow people to have a look at the information and provide comment.

Living in the downtown, the fact that this area is a neighbourhood as much as any other in the city was emphasized this past year due to Covid-19 and the decreased tourist traffic. It provided local residents the opportunity to come together and get to know each other better and help

out. Decreased foot traffic was instrumental in being able to recognise who lives/walks/works in our neighbourhood.

I would like to share the following thoughts on this issue:

1. I have stayed at vacation rentals internationally and find that the best option is to stay in a space attached to (or perhaps contained within) a primary/principal residence where the owner lives – the initial concept of AirBnB type sites. This maintains the sense of neighbourhood in the area. I would therefore be in support of an option that allows for this – scenarios 1 or 2.
2. I would be against scenario 5 “or the DMUN” zone. As above mentioned , we are still a neighbourhood here and allowing a generalised repurposing of homes and housing is not constructive to maintaining or increasing our sense of neighbourhood.
3. Anyone, even a principal residence accommodation, should have to be inspected and licensed by provincial and possibly municipal offices. This might also create a taxation trail so that the revenue can be monitored. Payments from AirBnB go directly into an account and while a summary statement is provided to the host, there is no copy submitted for federal taxation purposes. It is an honour system to report income for taxation.
4. Anyone who wants to run a ghost hotel (single location or spread out over many locations) should apply for hotel licensing and rezoning.

Andrea Battison

My name is Andrea MacDonald and I live in Charlottetown on Cumberland Street.

I fully support the proposed STR regulatory framework as outlined in the document entitled: *Short-Term Rental Zoning & Development By-law Amendments* (File: plan-2021-04-october) published on October 4, 2021.

As my representative, I ask you to please vote **YES** for these regulations.

This matters to me as my family and I are long term renters and know first-hand the struggle of finding affordable and suitable housing. With the highest inflation rates in all of Canada and a low minimum wage, sky-rocketing housing prices and limited availability are difficult to contend with. Supporting the SRT regulatory framework would show your support to members of this community as safe and affordable housing is a strong determinant of health.

Thank you for your work on the issue of housing for Charlottetown residents.

I hereby support the proposed Short-term Rental regulatory and licensing framework — also known as Scenario 1 — as presented during the November 9, 2021, public meeting, including the amendments to sections 3.2, 4.5, 5.6, 5.7, 6.11, and Appendix A as listed below, the *exception* being Section 43.1. (I do not agree with parking minimums).

Short-Term Rentals (STRs) within the City of Charlottetown:

The City of Charlottetown is moving forward with short-term rental (STR) regulations. A short-term rental (STR) is defined as the rental of a dwelling unit or a portion of a dwelling unit for a period of less than 28 consecutive days. Staff are proposing that any dwelling unit except for apartments can be used as an STR under the condition that it is the host/operator's principal residence.

The following sections to the Zoning & Development Bylaw (PH-ZD.2) and Official Plan (PH-OPA.1) are being amended as well:

Official Plan amendments pertaining to:

- Section 3.2 Sustaining Charlottetown's Neighbourhoods: Requiring that an STR is operated out of the host's principal residence and compatible with the neighbourhood; and
- Section 4.5 Supporting Home Occupations: Licensing requirements for STR's.

and the Zoning & Development By-law amendments pertaining to:

- Section 5.6 Secondary Suites: To permit for an STR if host is present during stay;
- Section 5.7 Garden Suites: To permit for an STR if host is present during stay;
- Section 5.11 Tourist Accommodations on Residential Properties: An STR defined as a Tourist Home, permitted in the principal residence of the operator/host, either the entire or portion of the dwelling unit to be rented, max of four (4) bedrooms to be used, and operator/host does not have to be present at time of stay (only if the principal dwelling is being rented);
- Section 43.1 Parking Space Standards: ~~Two (2) parking spaces required~~; and
- Appendix A. Definitions: To include the following definitions: Booking, Principal Residence, Short-term Rental, Tourist Accommodation, and Tourist Home.

Gratitude extended to Robert Zilke for his thorough Technical Background report.

Sincerely,

Barbara Dylla

We are residents of Sherwood who attended the public consultation meeting at the Confederation Centre on November 09.

First, we applaud the committee for the respectful way in which this public meeting was conducted. It was an excellent opportunity for residents to voice their concerns, either virtually or in person. The views of the senior executive from Toronto who represented a commercial enterprise only strengthened the resolve of residents who favor strict STR regulations.

Secondly, we wholeheartedly support the city's plan for Short term Rental regulations, as outlined by Robert Zilke. In the words of one memorable speaker, we residents have nothing against profit making enterprises; but maximizing profit at the expense of citizens trying desperately to find lodging in the city is deplorable.

We wish you well in the next phase of instituting STR regulations and thank you for the hard work that has been accomplished by the Planning and Heritage Committee.

Respectfully,

Bernard and Susan Pépin

Thank you so much for the meeting last night. I've copied Alanna on this email as she was present although my Ward 4 councillor was absent.

The information we were presented with at the beginning was incredibly insightful, and I took some comfort in seeing the stark picture the numbers painted. It is very obvious that regulation is desperately needed even without the impassioned pleas of tenants, homeowners and most rule-abiding STR hosts.

In 2019, my fiancé and I were living in Toronto because that was where we thought we needed to be to work in the arts. When we both landed full time jobs in Charlottetown, our favourite city in the world, we thought we had hit the jackpot! All we needed was somewhere to live. The months ticked by towards our moving date, and we were constantly coming up empty handed. When we should have been getting excited to start our new lives we were panicking because we couldn't find anywhere to live.

And you know, it wouldn't have been so upsetting if there was actually nowhere to live. But there were places to live. Plenty of them in fact! An endless supply of beautiful homes where we could have started our lives. In fact they were all listed on a website touting all of their wonderful amenities side by side. They were, of course, Airbnb's and all in the five to eight thousand dollars per month.

We were lucky and some friends had a spare room that we could stay in until we found a place of our own. But I couldn't help but wonder that if two well connected young professionals moving home from Toronto couldn't find a remotely affordable place to live for months, what impact was this having on immigrants from overseas? Queer youth? People escaping abusive relationships?

I've lived all over the country and travelled all over the world, and I can say that Charlottetown is the best community to live in as an But communities need real people living in them and real people need homes. Every property that is purchased with the sole intent to rent it to tourists here for days at a time delivers a death blow to our community. It's one less place someone is going to live and thrive and contribute to making Charlottetown a better place to live, and in turn a better place to visit.

Unregulated short term rentals are bad, but in a community like ours they are predatory. Mr. Mayor and council, I implore you to choose option 1 or 2. I agree that anyone should be allowed to share their primary residence, but no one should be allowed to profit by robbing their fellow citizens of the opportunity to build a life here.

Thanks in advance for your time, I do trust that you will do the right thing. Imagine the collective sigh of relief our city will breathe as dozens of units are returned to the people who make Charlottetown the best place in the world. I think we can agree those are its citizens, and not the people who profit off of having numerous short term rentals.

Brandon Howard Roy

I hope you are taking good care as we begin to experience some warmer weather on PEI.
I write to you today to provide feedback regarding the Planning & Heritage Department Public

Meeting on the topic of STRs within the City of Charlottetown that took place at the Confederation Centre on May 17, 2021.

CBC Reporter Nicola MacLeod's follow-up with Councillor Duffy about this meeting the following day was disappointing. To learn that this public meeting is not being considered part of the "official path" to creating a bylaw to regulate STRs demonstrates a blatant disrespect of the time, energy, health and safety for members of the public who attended. As outlined under your "City Meetings 101" online page, public meetings of council are:

"..held to formally consult the public. These are typically related to Planning and Heritage items [...] Public Meetings of Council are the formal platform that provides an opportunity for the public to speak and give feedback to Council."

It is peculiar that a large in-person public meeting would be held – in the midst of the ongoing COVID-19 pandemic – only for attending guests to learn after the fact that their input was merely "more of a warmup", contradicting the very purpose of public meetings. This should be rectified promptly by:

- 1) Issuing a public statement to notify City of Charlottetown residents and attendees that all input/feedback on the evening of May 17, 2021 will be incorporated into the "official path" as the City moves forward with its next steps in creating a STR bylaw.

Furthermore, I would like to address the collection of personal information during this meeting. I do not see the necessity of having members of the public disclose their first and last name, along with their address/street name in order to speak at a public meeting. This is particularly sensitive information, especially when many speakers and attendees were young, racialized, disabled, queer, gender-diverse, low-income and renters.

I must emphasize how frightening it is – and how much courage it takes – for the above demographics to show up to these public meetings, especially when the topic at hand pertains to their past, current and/or prospective housing situations(s). Sharing their personal information publicly and on record without disclosing *why* and *how* this information will be used by the City is irresponsible at best, and at worst could result in negligent misuse of their personal information.

Considering the unique and often precarious situations that many renters and housing insecure persons are in, I suggest the following protocols for STR meetings and consultations going forward:

- 1) **Engage with renters** – particularly low-income and racialized renters – in the City regarding their lived experiences. Doing so will provide insight and direction on how to ensure their privacy and safety is upheld.
- 2) If the collection of personal information is necessary, be transparent as to **why, how the information will be collected and how it will be used *before* a meeting** (ex. in a news release and a reminder at the beginning of a meeting).
- 3) One alternative to having speakers state their first and last name along with their address/street name: **have speakers disclose only their first name and the Ward in which they reside.**

Finally, I would like to formally express my support for Scenario 1 or Scenario 2, as outlined in the presentation delivered at the public meeting. The data that we have thus far clearly demonstrates the impact that STRs have had on our private rental housing stock.

I acknowledge the multi-faceted nature of both our general and affordable housing shortage. However, it is unacceptable to infer that the “STR issue” and the “housing issue” are separate and distinct problems. The information that we have at our disposal tells us this is factually incorrect. I do not anticipate that adopting STR restrictions will solve the housing shortage, but appropriate restrictions will provide some much needed relief.

Best regards,
Brittany Cormier

I will begin by saying I am not a resident of Charlottetown nor do I own property in Charlottetown. However, I am an Islander and my family has lived here since 1821. I am a supporter of all Charlottetown has to offer and wish to add my voice to the STR issue. I am submitting my written comments to the Planning and Heritage Department on the current proposed Official Plan & Zoning Bylaw changes on Short-Term Rentals (STRs)

Firstly, I want to thank the city for the opportunity to watch the public meetings online. I also want to thank your city planner Robert Zilke for preparing the proposed plan. There will be some who will not like the findings or recommendations, thus the reason they are required.

I am in favour of the proposed regulations and I believe it will bring back downtown neighbourhoods where families can live and communities flourish.
If we want Charlottetown to prosper I believe we need year round housing and year round residents.

- limit STRs to an owner's primary residence
- ban corporations from operating STRs
- prohibit STRs from operating in apartments

I also say NO to grandfathering-in any commercial STRs that are operating illegally under the City's current Zoning Bylaws. One would hardly reward those who were running illegal operations over these past years. Also, what would that say to those who operate within the law.

I'm for the slogan people before profits!! Thank you for addressing this issue.

Carol Carragher

I implore Charlottetown City Council members to not only follow the recommendations of the Planning and Heritage Department, but to also reject the proposal of grandfathering in current STR operators who are already not following bylaws.

What kind of message would it send to grandfather these business operators in, under the reasoning that they are already breaking the rules, so why should they have to stop?

STR operators, especially those who are property hoarding and have multiple STRs, are not only directly contributing to the island's housing crisis, but also exploiting and profiting from it. Safe, affordable housing is a human right which should absolutely trump the desire of a select to profit off the backs of the rest of the city's (and entire province's) citizens.

We have students with no place to live in the summer because too many rentals now are from September to May, so the owners can cash in on the lucrative business of charging a nightly rate the other months of the year. We have families unable to find long term, affordable rentals. We have vulnerable people who need year round rentals, not temporary ones. Forcing current operators to convert non compliant STR operations into long term rentals (if they do not want to sell) would bring an influx of available housing for the many who need it.

Charlene Wright

Dear Planning Committee,

I strongly support returning more long-term housing into the market.

As presented in the public consultation on May 17, 2021, I support scenario 2: principal residence only, apartments allowed, and returning 122 units to the market for long term rentals.

I am a tenant in a 6-unit apartment building on Prince Street, Charlottetown in the Queen Square area. I've lived in this building with my partner and our dog for 5 years since moving back to the Island. During the past five years, everyone in the building has been long-term residents, ranging from seniors, students, working professionals, and a young family.

In the span of time I have lived in this building, the tenants have formed a community where we can count on each other to help with things like pets, shovelling snow, and general social support. Because of living in a shared building of long term tenants, many people from different walks of life have come together to create a community of support. This was especially noted during the initial months of the global pandemic in 2020. This type of community would not be possible if these units were short term rentals.

Stable, safe and affordable housing is crucial for building strong communities. Please consider prioritizing communities and safety over profits.

Thank you,

Christina Clorey

My name is Claire Byrne and I am a lifelong resident of Charlottetown. I was in attendance at both the public consultation in the spring and the one November 9th. I have been renting in Charlottetown on and off for nearly a decade.

I wholeheartedly support the recommendations put forward by city planning to limit short term rentals to be owner-occupied only. In addition, I also urge that there be no grandfathering of current STRs. Owner-occupied only means that residents and homeowners in Charlottetown can

profit from the tourism season while not affecting the housing stock in hugely negative ways. It feels redundant to continue to repeat what has been proven for several years through stories shared, official research, and now two public meetings on the matter that STRs need to be regulated. The small number of people who have been exploiting the lack of oversight of STRs in Charlottetown need to be stopped for the sake of all of us who call Charlottetown home year round.

Though STR operators continue to say they have not impacted the housing crisis, they absolutely have. I shared in the spring public meeting some of the experiences tenants have had in accessing housing during this crisis: I have faced landlords increasing the price of the rental by \$500 dollars a month during the viewing saying that it was because he had so much interest in the unit. I have heard from friends who have had landlords refuse to rent to them due to their race and nationality, other landlords refuse to turn on the heat for their tenant, another friend paying \$2500 a month for a bungalow to house her family (on a property where the mortgage is already fully paid), and another friend on Social Assistance trying to find housing for her and 6 children when only being allotted \$1300 for rent (this has obviously turned up no options for her and her family). I have also heard from someone that his child and their mom were also displaced recently, they were told by the landlord that a family member was moving into their unit and were given three months to move. When they finally moved they saw shortly after their unit was advertised short term on Airbnb. And of course not all these miserable landlords and challenges in accessing safe housing are the responsibility of the STR operators, but STR operators have contributed to this crisis that pushes people to the brink, and for what? For them to **“collectively make 8.5 million dollars in STR revenue in 2019 with the top host earning \$430,000”**. In addition, in the STR report by the city, it was cited that **“the growth of STRs have contributed to an increase in rental costs of approximately 37.7% since 2017”**. And further, implementing scenario 1, owner-occupied STR only, **would return 135 homes back into the housing market**. These are statistics taken directly from the research done by the city planners. As such the city should take this research to inform regulations, to regulate these STR operators in the interest of public safety and security, and protect the housing of an overwhelming majority of Charlottetown residents in light of this housing crisis.

STR operators have tried to steer this conversation on regulations towards speaking solely about their investments as opposed to the mounting evidence that STRs are imposing huge amounts of stress in our communities. I grew up in the downtown core and the notion that STR operators revitalised “drug houses and slums” is offensive and disconnected from reality. What I saw in being in the heart of downtown for 20 years was that there was affordable housing for those who could not afford to buy or even rent in the growing suburbs. My family had one income when they bought our family home. Our home was surely seen as being one of those “drug houses” or “slums” referenced in the November meeting. What it was in actuality was a beautiful run-down 100+ year old home that supported me and my family now for almost 30 years. Our neighbours and community around us were vibrant and loving. STRs in the area did not revitalize downtown, they took the heart out of it, they displaced (and are displacing) people who need affordable places to live. And now these operators are trying to skirt fair regulations instead of facing the consequences of their actions and the risks they took in investing in something that lacked oversight and clarity, that was clearly harming and displacing Charlottetown residents. And ultimately, these STR operators can continue to turn a profit in renting long term. Their argument

that we need to grandfather them into STR regulations (at the risk of the majority) so they can protect their investment is as tonedeaf as it is laughable.

Grandfathering of existing STRs into future regulations should be totally out of the question. We saw with COVID many of these STRs return to the market with the lack of tourism, we saw this reflected in the vacancy rates. I have lived in an STR turned longterm rental for 10 months and we were very fearful that our housing would be compromised if these regulations allow for existing STRs to be grandfathered in and tourism returns as expected next summer. We have an excellent relationship with our landlord and after a conversation we know that he is done renting short term. Although, I know this anxiety over a loss of housing rings true for many people who are currently renting from STR operators, many being the same STR operators who are signatories in the communications to Council regarding regulations. Inaction on these proposed regulations or grandfathering current STRs means that we are still in the same position. We are not talking about regulating future hypothetical STRs, we're talking about regulating the ones who exist who have been shown, in anecdotes and now also in the data collected and presented by the city planners, that STR operators took long-term homes to turn into ghost hotels and now are trying to deny facts and statistics and avoid fair regulations.

The regulations proposed by the city planning department are thorough and complete, and have taken into account the layers of this housing crisis and the contributing negative effects of STRs on the existing housing stock. I fully support the work done by the city planners and the proposal to regulate STRs to being owner occupied only with no grandfathering of current STRs.

I look forward to seeing the city of Charlottetown put the safety and security of the majority over the economic interest of a handful of people and implement these regulations.

Thank you for your time,

Claire

Dear Councillor Ramsay,

I am writing to you today about the recent public consultation on short term rentals in the city of Charlottetown. I am a young person who just finished university in Ontario, and was beyond excited to move back to Charlottetown. Charlottetown is my home and I love being here.

I urge you to take seriously the concerns expressed by multiple young Islanders last night, who explained the difficulties faced by young people in Charlottetown due to our housing crisis. I desperately want to stay in Charlottetown, and know that I have a lot to offer this city. Unsecure housing poses a real threat to Charlottetown's ability to retain its youth.

Last night we heard from people who have faced racism, harassment, and neglect by landlords. I know that STRs are not the only cause of this crisis, but it is also clear that adopting **option 1 or 2** would help. The information that I can find indicates that rent for a 1-bedroom has increased 48% over the past year. That means over \$400 increase. I make just over minimum wage working at a

non-profit organization in mental health promotion. Last year (if I could have found one), I might have been able to afford a 1-bedroom apartment, and this year I definitely cannot. Minimum wage in PEI has not changed, but cost of living in Charlottetown has changed drastically.

I know that there are many sides to this conversation. But frankly, I think that the side that is concerned with making sure that young people and low-income people have safe places to live is the one we need to be focusing on. My work in mental health promotion has shown me the direct correlation between mental wellness and secure housing. I believe that everyone in our city has the right to both of these things.

I look forward to seeing what decision the council comes to.

Sincerely,

Claire Chilton

Hi Councillor Tweel,

I live in your ward and hope you're going to be in attendance at the City's public meeting on proposed regulations and licences at the Confed Centre Nov 9. It's important to me that you hear residents' thoughts on this issue. Landlords have enough spare change to hire a lobbyist and this is all residents have to have their voices heard on this issue.

To be clear - I support the proposed framework and hope you will too.

All I ask is you listen. Thank you for your work.

Kind regards,

Danielle

This letter is to express my concerns in respect to Short Term Rentals and Rental Properties, and the direction they have been going over the past few years, I have been dealing with a home beside me that has first been rented out as a rooming home (6 to 8 people living in the home, cars all over the place) and now operates as a STR /boarding house. The owner is not living in the home, in fact lives off Island, leaving the residences of the area to deal with the issues that come up in relation to the property. I always felt that our neighbourhood would not have to deal with these issues as the area is zoned R-1 Single Family Dwelling. I contacted the city various times with no action. As far as STR's I feel we currently have them, in the form of Hotels/Motels. Hotels/Motels operate in Commercial areas, have regulations and need to meet fire codes etc. STR's and rental properties do not have to meet the same standards.

As a lifetime resident of the City of Charlottetown, I feel that there is no place for Short Term Rentals in Charlottetown unless they are in an area zoned

Commercial, and if homes are being rented, they should have regulations as well. It would make a difference if the owners of these properties had to reside in the premises. Several people are asking for there (STR) to be grandfathered in, this should not be allowed as well.

Dean Adams

Hi Mike, it's Debi Buell and I live in Charlottetown on 17 Euston Street.

I fully support the proposed STR regulatory framework as outlined in the document entitled: *Short-Term Rental Zoning & Development By-law Amendments* (File: plan-2021-04-october) published on October 4, 2021. As my representative, **I ask you to please vote YES for these regulations.**

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Debi Buell

I would like to congratulate the planning department for having the wisdom and courage to make such a sensible plan with respect to short term rentals in the city. I'm extremely impressed at your grasp of the situation and your ability to put all the competing interests in the right order.

I'd like to relate two of my personal experiences to add to the call for the rules you are planning:

A few years ago I travelled to Lisbon, Portugal. One evening there was a protest march going through the city and we asked a local resident what it was about. We were told it was by concerned citizens who were finding it harder and harder to find an apartment for rent in the city because so many were being converted to AirBnB's. There were less left to rent and the prices were going up. Also, they feared that their downtown would become strictly a tourist attraction and not a place with a vibrant population.

Again a few years ago a friend of mine was renting a small house near co-op diamond when his landlord evicted him after several years of rental. The landlord told him he was going to renovate it and turn it into a STR- which indeed he did do. My friend had 1month to scramble and find a new spot. He rushed, bought something that doesn't suit and is now trying to find a better situation.

What kind of city do we want? Profit at all costs? Apartment buildings where virtually no one actually lives there? A downtown shell with less and less residents?

I'm all in favour of owner-occupied houses renting out space. We have had licensed rental units, previously called "tourist homes" like this for over 40 years.

Please "stick to your guns" and don't change your proposal nor grandfather anyone in. It's not just new units we need to limit its all the ones taken out of the market that we need back.

Thanks for your time.

Edie Rogers

My name is Eileen Conboy and I am in support of "The Planning & Heritage Department's recommendations that the proposed Official Plan amendments pertaining to:

- Sustaining Charlottetown's Neighbourhoods; and
- Supporting Home Occupations. and the Zoning & Development By-law amendments pertaining to:
- Section 5.6 Secondary Suites;
- Section 5.7 Garden Suites;
- Section 5.11 Tourist Accommodations on Residential Properties;
- Section 43.1 Parking Space Standards;
- Appendix A. Definitions. be approved to proceed to public consultation."

In 2014, I returned to PEI to work full time at the PEI Rape and Sexual Assault Centre (PEIRSAC) as a counselling therapist. At that time it was quite difficult to find an apartment, as rental rates in Charlottetown were already competing with rates in Ottawa. After some searching I found an apartment that was listed as available October to May in the ad. I decided to go see the apartment anyway and after having a conversation about that undesirable timeframe with the landlord I said no thank you to the apartment.

You see, I was trying to create a life on PEI. I loved working at PEIRSAC, I was creating connections in violence prevention community, and was making friends with other young professionals who lived nearby.

A few days later, the landlord text me and said "we would really like you to be our tenant" and reassured me that they would extend the lease to a full year with opportunity for future leases after that year was up. I was thrilled! I moved into my own Charlottetown apartment, walked to work and restaurants, shopped downtown and overall participated in Charlottetown life.

Once the year lease was up. My landlord contacted me to say that unfortunately he would have to take possession of the apartment again the following spring. He said that he had renovations that he needed to do like "sound proofing" etc. I worried that it was me (single woman + cat) who made him realize that the apartment needed sound proofing so I sadly started making plans to move. Finding another apartment at that time was impossible. The vacancy rate was already close to 0.3% I planned to move home with my parents for a while to figure out my next steps

Moving day approached fast, and my mother came over to help me clean. We spent the day mopping, vacuuming, washing every inch of the apartment. Realizing that the landlords would be renovating but wanting to leave it the way I found it.

The day after moving day my friend sent me a posting from VRBO of a downtown apartment ready to rent immediately. It was my apartment. I was devastated. I felt violated and abused. I trusted my landlords.

I contacted my landlords and acknowledged to them that I had seen the posting. I told them that if the apartment was good enough to rent on VRBO then it must mean that I did a good job cleaning and that I would like my damage deposit returned.

They emailed me back not acknowledging the listing but to say that they had found issues with my cleaning job. I told them I would come over immediately to talk about this. I went to the old apartment and they proceeded to show me around to a couple different points in the apartment where they found dust. I was shocked, and as usual when women are confronted, or overpowered, or manipulated, I cried. I could not confront them in the way that I wanted to. They had my money that I needed to put toward a new place to live. I left them again feeling violated, and abused.

I have an amount of privilege because I am a cis-gender, white woman in Charlottetown. I was able to move home with my parents in Cornwall, but not everyone has this support. I can't imagine what it would have been like if I had children, was a newcomer, was disabled, or had other intersecting identities (truly the list goes on.) With the help of a friend I did find a place to live not long after I moved home. However, the precarious feeling of being housing insecure never went away. It is very hard to impossible to participate in community or be mentally well when you are worried about your access to a basic human necessity like housing.

Having now worked for 7 years in violence prevention in Charlottetown (specifically sexual violence prevention) I can tell you that a lack of accessible, and available housing means that our most vulnerable community members (who are our family, friends, the cashier at your local grocery store, classmates, church members) continue to exist in family violence situations because there is nowhere for them to move to.

I URGE you to regulate short term rentals on PEI. Ensure that our communities reflect the values that we SAY we have for our residents on PEI. I am confident that with regulation you will see the community vibrancy, economic growth and tourism that you are looking for.

Thank you,

Eileen Conboy

I recently moved to Charlottetown (3 months ago) and I can already see the strain that young folks and even seniors are going through having rents as high as some places in BC, where I am from originally. Having to move every 8 months sounds like a nightmare that I wouldn't wish on anyone. I spent my twenties in the tight housing markets of Toronto and Vancouver, and it was hard enough to find housing when I wanted to move - much less being forced to move to accommodate STRs as the poor folks in Charlottetown are experiencing. I love this place already. It has something special: the respect for community. Please work to preserve this. I believe that the recommendations made by the city planner Robert Zilke will go a long way to set a precedent

not only in PEI but the rest of Canada, to show that a community can fight back against profits over people.

Thank you,

Emily Horn

My name is Emma Drake and I am a resident of Ward 1. I am writing to you today to express my endorsement of scenarios one and two in relation to the regulation of short-term rentals.

As a former President & CEO of the UPEI Student Union, I have been researching and advocating for the regulation of short-term rentals since 2018, with specific reference to their negative impacts on students. My colleague Sweta Daboo and I had the honour of presenting to the City Council on behalf of the UPEISU regarding short-term rentals in January 2020. While I am no longer with the UPEI Student Union, as a recent grad and public policy enthusiast, I continue my support for the regulation of short-term rentals.

To begin, Dr. David Wachsmuth's research identified that short-term rentals, "took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the Summertime which is an 8.9% increase in loss from the previous year." His research also showed that the "growth of STR's has contributed to an increase in rental costs of approximately 37.7% in 2017." This makes "STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter." **While short-term rentals are one piece of the puzzle, make no mistake, without regulation and enforcement, short-term rentals have created a unique impact on the housing crisis in Charlottetown.**

As an attendee of the May 17th consultation on short-term rentals at the Confederation Centre of the Arts, I was disgusted, but not surprised when listening to the negative lived experience of many low-income, Black, Indigenous, and People of Colour, and or folks with disabilities as homeowners and renters in the Charlottetown market, due to the pervasion of short-term rentals. For example, one resident stated being displaced throughout the months of May to September and paying a premium of \$2700/month from October to April. Looking at short-term rentals through an equity, diversity, and inclusion lens, it is clear that strong regulation in the form of scenarios one or two is needed.

Scenario one and two are the strongest policy options to provide unique tourist accommodations, and economic opportunities for hosts while balancing the need to preserve our historic neighbourhoods and make Charlottetown an accessible option for residents, guests, and anyone who wants to enjoy our beautiful City.

Best regards, Emma Drake

To Alanna Jankov,

My name is Evan Cahill and I live in Charlottetown on Cumberland Street.

I fully support the proposed STR regulatory framework as outlined in the document entitled: Short-Term Rental Zoning & Development By-law Amendments (File: plan-2021-04-october) published on October 4, 2021.

As my representative, I ask you to please vote YES for these regulations.

Myself and many others I know have always struggled financially, put into the position of being unable to afford our own homes and required to rent. Many living on minimum wage are now unable to afford rent, the cost in Charlottetown often exceeding 50% of the net income of a full-time minimum wage worker. As the number of unregulated short-term rentals increases this cost will also. As more landlords convert their long-term units into short-term rentals the availability of long-term rentals drops, and landlords use this to justify increased prices.

In addition to this, the increasingly more common practice of “renovictions” shows landlords, without regulation, will happily evict current tenants just so they can double the rent for the same unit. This behavior under the current unregulated system is encouraged, as a landlord you are financially incentivized to take these actions, and the residents of Charlottetown, and Prince Edward Island, are left defenseless. This regulation of short-term rentals would be a good first step to protecting Island and Charlottetown residents from predatory and exploitative rental behavior.

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Evan Cahill

Hello - I was an attendee at this evening's meeting on short-term rental regulations in the city and have been following this topic for several years.

I'm a homeowner in Ward 4 and have seen the negative impacts that the unregulated STR industry has had on my community and city as a whole. While STRs are not the only cause of our housing crisis, there is a clear link between a decrease in supply and increase in cost to those who wish to live here long-term.

I'm in full support of people being able to offer visitors the unique experience of seeing Charlottetown from a local's perspective by renting space in their primary residence, and would love to see the city move forward with scenario 2 from the proposed recommendation. This would return to the soul of services like Airbnb being part of the sharing economy and, more importantly, return desperately-needed dwellings back to the long-term housing market.

Please consider the best interests of Charlottetown's least-powerful when making your decision, not just the ones with the biggest chequebooks.

Fierah Livingstone

Dear City of Charlottetown Planning and Heritage Department,

The Hotel Association of Canada would like to present the attached written comments regarding the matter of proposed regulations for Short Term Rentals. Please see the document titled "HAC Charlottetown Submission Nov 19" for the Association's comments.

Additionally, we have attached a framework that the Association has created to assist regulators when developing rules for short term rentals.

Thank you for your consideration of the attached materials.

Sincerely,



Aaron Haddish
POLICY ANALYST

HOTEL ASSOCIATION OF CANADA
ASSOCIATION DES HÔTELS DU CANADA

Suite 1206 - 130 rue Albert Street, Ottawa ON K1P 5G4
T: (416) 993-7020
hotelassociation.ca | @hotelassoc
ahaddish@hotelassociation.ca

Further to the public meeting on Short Term Rental Regulations held last night at the Confederation Centre, I am submitting my comments as a resident of the city, as well as a provincially elected representative. Thank you for holding a public meeting, and for seeking public input on this important topic.

Regulation Recommendation

Option 2: permitting short term rentals in any principal residence including apartments, with no allowance for commercial short term rentals. By choosing a strictly owner-occupied model we would be adhering to the guiding principles of the City which is to protect long-term housing and community stability.

Grandfathering

No decision on regulations should include grandfathering of existing short term rentals / properties; not only would this defeat the object of regulation and create a much more complex regulatory landscape, but there is no current provision for short term rentals in the City bylaws - so all existing STRs are illegal.

Grace Period

One year from the implementation of regulations to allow for properties that are no longer legal to be sold or converted to long term rentals.

Levy and Compliance Officer

Accommodation levy equal to or greater than that paid by existing tourism accommodation providers, with a portion of funds used to support compliance staff who are responsible for ensuring all properties are registered, inspected, and meet required regulatory requirements.

Mitchell, I was disappointed that you were not in attendance, as our Ward has its fair share of STR properties (there are nine on the route I take walking my dog, for example). I am including you on this correspondence so you are fully aware of my feedback.

I am hopeful that we will see action on this file soon.

best regards

Hannah Bell

MLA District 11 Charlottetown-Belvedere

My name is Dr. Heather Chandler and I live in Charlottetown on Cumberland Street.

I fully support the proposed STR regulatory framework as outlined in the document entitled: *Short-Term Rental Zoning & Development By-law Amendments* (File: plan-2021-04-october) published on October 4, 2021.

As my representative, **I ask you to please vote YES for these regulations.**

I am a veterinarian currently living and working in Charlottetown. However, this was jeopardized in the final month of my third year at the Atlantic Veterinary College. At this time, the apartment building I was living in was purchased by Zack Court who subsequently evicted the elderly couple below me who had been residents of the building for 11 years. They were forced to live separately following the eviction as they had no other options left available to them. Mr. Court then went on to "reno-vict" myself, and three other tenants of the building within a 3 week period. No evidence of renovations were apparent in the following months, and having kept in touch with the neighbours, I am aware that Mr. Court subsequently used these units for short term rentals. I was left scrambling to find a place to live, while trying to complete my schooling and work part time. Mr. Court kept the entirety of my damage deposit, citing pictures he had of my apartment, having entered without my permission, in the ensuing IRAC complaint. My apartment was cleaned to the same standard as the other units, which I toured having been friends with the tenants. Mr. Court consistently displayed a lack of respect and maturity, failing to show up for hearings and suffering no penalties for the inconvenience caused by his actions when I repeatedly had to take time off of work and school to attend. Why are we continuing to allow wealthy individuals to monopolize the only available/affordable accommodations in this city with their bullish behaviour? What are we doing to support the young/student/vulnerable populations? We cannot continue to be surprised that our young innovators are leaving this city when we are left with nowhere to live.

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Dr. Heather Chandler

I write to you regarding the ongoing discussions about moving forward to regulate short-term rentals. I have concerns with some of the proposals that are being put forth by current STR operators. I have not been directly impacted by the influx of STRs and am fortunate to have a secure, relatively affordable, and conveniently located apartment.. However, I am very concerned with the impact the growth of STRs has had on the housing market and the pain it has caused. From what I have learned, talking with like-minded people who are more knowledgeable than me, and especially hearing the presentation of research from David Wachsmuth's research at McGill, here is what I hope you will consider in creating the new regulations.

1. Restrict AirBnB to the host's primary residence. The company clearly emphasizes that the experience is intended to be a shared one between the host and guest. If people are operating AirBnBs as if they are the same as regular tourist accommodations, they should be subject to the same requirements, such as safety codes and commercial taxation.
2. Create a new system for registering short-term rentals. As Dr. Wachsmuth said, the lack of data is one of the biggest obstacles to effectively addressing these issues.
3. Do not grandfather in new rules. This defeats the purpose. Commercial short-term rentals are taking potentially hundreds of units from the long-term market. This effects not just the amount of affordable housing, but housing availability and increased costs across the board. Also, the rate of new builds will take years to catch up to what STRs have removed from the market.

I am eager to see how this process continues in the new year.

Thank you,

Isaac Williams

Finally, it appears that City Councillors, Planning Board members, and leadership in the Planning & Heritage Department are set to acknowledge what Charlottetown citizens and local housing advocates - myself included - have been saying since at least 2018. Namely, that the unchecked proliferation of Short-Term Rental (STR) operations within the City - particularly commercial operations located within the City's downtown core - has caused more harm than good to Charlottetown, and that the situation cannot continue as it has for too many years. I strongly support the proposal now before City Council & Planning Board - as well as the additional steps to follow to ensure compliance and enforcement with a robust regulatory regime.

At the outset of this submission, I wish to recognize City Planner Robert Zilke and thank him for the years of hard work that he has put into this file. I do not know Mr. Zilke personally, and I have only spent time with or spoken to him at any length on a couple of occasions (first, at a meeting

at City Hall with the Mayor, Coun. Rivard, & others on the afternoon of Mar. 9, 2020; second, at a meeting of the Planning and Heritage Committee on June 15, 2021).

However, in the course of my advocacy work around STRs, I have seen and reviewed much of Mr. Zilke's work product, as well as a significant amount of his correspondence on STR-related issues (along with that of multiple other City officials & staff obtained through "FOIPP" requests). Scurrilous and unfounded attacks on Mr. Zilke's professionalism, on his extensive research on STRs, and the allegations that he is not impartial on this issue advanced by local commercial STR operators¹ are beyond the pale. While I am confident Council and staff are fully aware that these attacks are unfounded - having heard from Mr. Zilke in many closed sessions - I encourage you to reflect on this behaviour when weighing the merits of the submissions made by Mr. Zilke's detractors.

I also encourage you to take any submissions from AirBNB Canada, or similar large corporate interests that have a direct financial stake in preserving the STR status quo, with a fist-sized grain of salt. The extensive data reviewed and analyzed by City planning staff that supports the

¹ Both at the November 9, 2021 Public Meeting, and in correspondence dated October 27, 2021 addressed to Mayor and Councillors by Terry McKenna, David Toombs, Terrie Williams, along with 47 other local STR operators (attached to this submission).

current proposed STR regulatory framework comes from third party entities such as Granicus (aka Host Compliance) and the experts at the McGill University Urban Politics and Governance research group. Why is that? Because entities such as AirBNB Canada choose NOT to assist governments by proactively providing data to inform the development of sound planning policy. Rather, it only offers up such data after a municipal, provincial, or state government has used data from independent sources confirming that STRs are a net negative on communities to develop policy. Cherry-picked internal data offered up by AirBNB at the eleventh hour of the Planning Department's process - and based around information collected during a pandemic - is of dubious value (at best).

I strongly oppose the proliferation of commercial STRs that displace people within a community that is in desperate and immediate need of more housing options at multiple price/affordability points. That's where we are in Charlottetown today, and it's where we have been for years.

I could spend many pages highlighting key passages & findings from the February 2020 Wachsmuth Report, which is the most authoritative, reliable, and independent analysis of STRs in the City of Charlottetown from pre-COVID times. Instead, I will highlight a few, while asking every member of Planning Board & City Council to read (or hopefully, re-read) the entire report; and to really think about what an STR regulatory regime ought to achieve for Charlottetown.

In the words of the Wachsmuth team:

On the Short-Term Rental Market

- Charlottetown's STR market is dominated by entire-home listings, which make up 77% of active listings and earned 89% of all host revenue in 2019.
- Family-suitable homes with two or more bedrooms make up 73% of entire home listings in Charlottetown.

Housing Market Impacts

- STRs removed an average of 138 housing units from Charlottetown's long-term housing market in 2019, and an additional 55 units were active full-time during the summer high season.
- STRs are responsible for 38% of all rent increases in Charlottetown since 2017. The growth of STRs in Charlottetown has cost the average Charlottetonian renter \$292 since 2017.

Regulatory Scenario Modelling

- There is little risk of an adverse tourism accommodation supply shock occurring in the wake of stronger regulations on STRs in Charlottetown, ***even under the more restrictive scenarios.*** (emphasis mine)

Host Compliance² Data Analysis

- The Host Compliance data has sufficient coverage to provide a reliable overview of the STR market, and to track changes over time.
- Because the HC dataset lacks detailed activity data, ***it cannot be used to conduct adequate housing-market impact analysis*** being contemplated. (emphasis mine)
- It should be feasible to monitor questions relating to the supply of STRs and their regulatory compliance in Charlottetown using the HC data.

Registration Status

- Like other tourism proprietors, short-term rental operators on Prince Edward Island are obligated under the *Tourism Industry Act* to register their operations with the provincial government.
- Of the 834 STR listings in Charlottetown active at some point in 2019, only 265 were identified as being registered.
- More than two thirds of listings (570) are not registered, and are therefore non-compliant with the *Tourism Industry Act*.³

Failures at the provincial (re: licensing requirements under the *Tourism Industry Act*) and municipal levels (re: Z&D Bylaw requirements) to pursue meaningful enforcement of existing regulations have accelerated the growth of commercial STRs in Charlottetown, resulting in a corresponding reduction in long-term housing supply. Dating back before the COVID-19 pandemic (and even before the 2018 municipal election), key voices at the City publicly denied the impact of commercial STR uses on Charlottetown's residential housing supply, and the negative results for all residents when it comes to both the availability & affordability of housing. However, the comprehensive Technical Report

Since at least September 2019, Planning Dept. staff have recognized that most - if not all - commercial STRs within the City of Charlottetown **do not comply** with the current Z&D Bylaw. As Mr. Zilke wrote in an email on Sept. 5th⁴:

"At present, a short term vacation rental that is not owner occupied is **not permitted** in the City of Charlottetown. A short term rental can be treated as a Tourist Accommodation as outlined in the Zoning by-law excerpt

...

² Now Granicus.

³ Conflicting with public representations regularly made by the Charlottetown STR Association that the majority of STR operators are following all the rules.

⁴ A copy of this email, obtained via a request under the *Freedom of Information and Protection of Privacy Act* (“FOIPP”), is included with this submission.

The current zoning regulations treat short term rentals as Tourist Accommodations you would have to apply through the Building permit process and provide all necessary info (i.e. site plan with parking, floor plans with # rooms, size, windows, smoke detectors) to ensure they comply with all applicable Codes and Zoning regulations (i.e. # of bedrooms, parking, signage, type of dwelling)."

Few - if any! - commercial STRs operating within the City have followed through on the Building permit application process Mr. Zilke references. The Planning Dept. could easily shed some light on this matter by releasing whatever statistics it has on Building permits issued for STR operations in the City of Charlottetown within the last 5 years. I respectfully submit that any STR operation - and particularly any commercial STR - that has failed to comply with these requirements should not be granted the privilege of being "grandfathered in" under any new regulatory model.

I also question whether having an abundance of STRs available in Charlottetown acts as a significant driver of our local or provincial tourism industries. All the things that make Charlottetown among the best places in Canada to live and visit - Restaurants! Theatre! Culture! History! - are still here even if there are several hundred fewer STR properties available for visitors. The Department of Economic Growth, Tourism and Culture produces detailed monthly statistics on overnight visits to Prince Edward Island, broken down geographically and by type of accommodation. I strongly suggest that the Planning staff obtain this data⁵ directly from the province in order to confirm or refute any anecdotal data or innuendo that the STR lobby may present.

People who elect to book STR accommodations outside Charlottetown are still going to come to Charlottetown to patronize our businesses in the hospitality industry. (And if they won't, that's indicative of a larger issue.) Furthermore, as far as I'm aware the City itself currently doesn't collect a dime in tax revenue or licensing fees from the hundreds of STRs operating within City limits. You can't lose revenues you don't already have.

All that said, with so many commercial STR units located in and around the downtown/500 Lot area, we are increasingly losing one of the things that makes our City vibrant: our people. With the explosion of commercial STRs, we've seen a gradual "hollowing out" of downtown (and downtown-adjacent) neighbourhoods that once offered many long-term housing options for Charlottetown residents, at varying price points.

Many City residents like to celebrate the ongoing gentrification of downtown Charlottetown. However, I believe this gentrification detracts from the distinct character of our City, and further marginalizes our more vulnerable citizens. Likewise, the "seasonality" of many commercial STR operations compels students to either move within or leave the City entirely each summer, and places the working-class people who staff so many of our downtown tourism businesses & attractions in a position where they lack proximate

⁵ Of course, this data may not include information from the many *unlicensed* commercial STRs in the City.

or easily accessible housing options at prices they can afford. The same can be said for people who generally lack access to affordable and reliable transportation options, whether due to financial circumstances or disability.

There is no doubt that a well-run commercial STR operation, particularly in an attractive tourism destination like Charlottetown, can be a very profitable enterprise - much more so than renting the same property to long-term tenants. The allure of that profit incentive becomes even stronger when it is apparent to the owners (or would-be/could-be owners) of residential housing units that local officials are quite happy to turn a blind eye to the harms caused by commercial STR operations. There will always be people and businesses who seize any opportunity to make more money, despite any greater social costs. It falls upon our Governments - both our elected officials and the bureaucrats/civilian committee members who support them - to see the big picture issues and to respond in a way that reflects existing laws, sound planning principles, and our society's values .

Documents obtained through the FOIPP process demonstrate that Planning Department staff have known for years that hundreds of STRs in Charlottetown were operating illegally, whether because they were: 1) unlicensed by the Province and/or City, or 2) Home Occupations that did not comply with existing & long-standing Zoning & Development Bylaw requirements for Tourist Accommodations.

At various times in recent years, Planning staff have communicated their concerns on licensing issues to provincial officials. Tourism staff have consistently issued licenses to commercial STR operators without seeking confirmation that the subject premises of the Tourism license complied with City Zoning regulations. This is particularly problematic given that the *Tourism Industry Act* has required such compliance since November 2019 (although the onus is on the license-holder to assure they are in compliance).

City Council have been aware of these issues since at least September 4, 2019⁷:

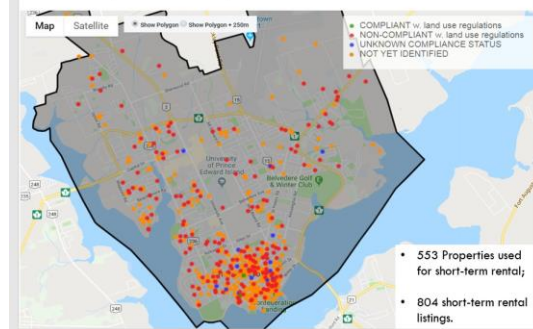
⁶ The merits (or relative lack thereof) of the T3 Transit system are a discussion for another time. It'll be sometime soon though.

⁷ Excerpted from a presentation made by the Planning Department to City Council in a closed session (unauthorized by the *Municipal Government Act*?), subsequently provided to STR operators.

Short-term Rentals in Charlottetown

- As of August 2019, upon an environmental scan there were approximately **553 properties used for short-term rental** purposes in Charlottetown;
- These listings are expected to increase during the spring and summer months (high peak for tourism);
- Tourism PEI requires operators to obtain municipal approval prior to receiving a license, however they have been issuing licenses **without** Municipal approval;
- These short-term rentals are not paying a commercial tax meaning missing revenue opportunity for the City.

Graphical Representation of STR's



STR's Profile Breakdown

Listing types

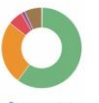


Single Family [63%]
Multi Family [25%]
Unknown [12%]

Bedrooms / Bathrooms



0 bedrooms [20%]
1 bedroom [22%]
2 bedrooms [22%]
3+ bedrooms [36%]



0 bedrooms [20%]
1 bedroom [22%]
2 bedrooms [22%]
3+ bedrooms [36%]

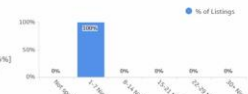
STR's Profile Breakdown

Land Use Compliance Status



Compliant STR [10%]
Compliant LTR [22%]
Not yet determined STR [53%]
Non-compliant STR [15%]

Minimum Nights Stay



Furthermore, the housing crisis in the provincial capital region stands to get worse before it gets better. The three major municipalities in the region (Charlottetown, Stratford, and Cornwall), together with the Province, have commissioned a major housing needs assessment study, with Stantec as lead consultants. As far as I am aware, the data gathered in the first phase of this project has not been shared with the public: yet.

However, having seen some of that data at a focus group conducted in June 2021 as part of a focus group for the second phase of this project, absent a policy response that focuses on increasing development & adding housing supply wherever possible - the general outlook is grim. Thousands - arguably tens of thousands - of units must be added to our residential housing supply within the next 20 years to accommodate our population growth, as well as the changing dynamics of our population. It is impractical and illogical to permit hundreds of **existing** units to operate as commercial

In making policy choices on a regime to regulate Short-Term Rental (STRs) operations, I believe it is critical to put the greater needs of city residents and other Islanders in desperate need of housing before the profit incentives of a relatively few property owners. I believe that a regulatory regime with significant restrictions on commercial STRs will have little to no impact on the City's tourism industry, or on City coffers. Furthermore, I believe this approach is consistent with the current provisions of the Official Plan and City Bylaws.

For years, representatives of the Charlottetown Short-Term Rental Association have consistently cherry-picked and even fabricated statistics to support arguments that favour their “industry”. They have misrepresented facts to the Island public and our local media, in the interest of personal profit. That needs to end. Because housing is a human right.⁸ Maximizing your return on investment is not.

Sincerely,

Jonathan Greenan Ward 1 Resident

⁸ Since 1948, per the United Nations’ Universal Declaration of Human Rights.

Attachments

FOIPP Email

On Thu, Sep 5, 2019 at 1:18 PM Zilke, Robert <rzilke@charlottetown.ca> wrote:

Hello

At present, a short term vacation rental that is not owner occupied is **not permitted** in the City of Charlottetown. A short term rental can be treated as a Tourist Accommodation as outlined in the Zoning by-law excerpt:

5.11 TOURIST ACCOMMODATIONS ON RESIDENTIAL PROPERTIES

5.11.1 Tourist Accommodations, such as a bed and breakfast or tourist home, are a permitted Home Occupation, subject to the following requirements:

- a. The Dwelling type in which the Tourist Accommodation is provided is a Single-detached Dwelling;
- b. It is licensed under the *Tourism Industry Act*;
- c. No Kitchen and/or cooking appliances are permitted in a guest room;
- d. No meals other than breakfast are provided to guests;
- e. Parking shall be subject to the parking regulations of this by-law; and
- f. Signage shall be subject to the signage regulations of this by-law.

5.11.2 The maximum Gross Floor Area for a Home Occupation does not apply for a Tourist Accommodation.

The current zoning regulations treat short term rentals as Tourist Accommodations you would have to apply through the Building permit process and provide all necessary info (i.e. site plan with parking, floor plans with # rooms, size, windows, smoke detectors) to ensure they comply with all applicable Codes and Zoning regulations (i.e. # of bedrooms, parking, signage, type of dwelling).

Hope this clarifies matters.

Petition addressed to Council from the STR Operators that is referenced in footnote 1 is included in Attachment K of the Planning Report.

Dear members of the planning and heritage committee and members of council:

On behalf of our household in Ward 4 I would like to express our support for the City moving forward with short-term rental (STR) regulations. We support the proposal that any dwelling unit except for apartments can be used as an STR under the condition that it is the host/operator's principal residence.

We want to live in a city that puts housing for residents ahead of short-term places to stay for visitors. We want vibrant neighborhoods, including vibrant downtown neighborhoods. Our definition of "vibrant" includes people of all socio-economic backgrounds.

I had the opportunity to observe the livestream of two public meetings on STR regulation and am very much persuaded by the evidence and testimony of members of the public advocating for housing as a human right and calling for more regulation of STRs. The proposal put forward by City staff is sound and well-reasoned. I disagreed with the views put forward by those speaking in favor of de-regulation.

I hope you will not put profit before people. We ask you to increase regulation on STRs in Charlottetown neighbourhoods.

Sincerely,

Jane Ledwell

I sent an email in October 2021 regarding the proposed STR regulations and am now resubmitting its content to ensure it is included in your feedback. Please see below:

Dear Mayor Brown and Councillor Duffy,

I would like to provide feedback regarding the proposed rules regarding short-term rentals. For context, I own a house in Ward 3, hold a Tourism PEI license for this property, and have rented to people both short-term and long-term. I would like to emphasize my absolute support for the proposed rules, recognizing that under these rules I would no longer be permitted to do short-term rentals. These changes are necessary to prevent Charlottetown from becoming even more reliant on a single industry to the detriment of local citizens who want to live in a vibrant, year-round community.

I have watched as friends in Charlottetown have been renovicted and struggled to find housing, and I don't wish to see this trend continue for my younger family members. I hope that this email will provide some counterbalance to other STR owner feedback you may receive.

Jill Forbes

I watched the short-term rental public meeting last night and couldn't help but notice the differences between the people concerned about short-term rentals and the people who came to defend them: one group shared concerns about the safety and happiness of their friends,

families and community while the other expressed concern only for themselves. It is also telling that even some owners of STRs want more regulations.

I was disappointed in the comments by Councillor Duffy who seemed unsure if anything would be done about this issue sometime this year. I have been documenting news stories related to the housing crisis since August 2019—I didn't expect to *still* be tracking it in mid-2021.

<https://jillianne.medium.com/peis-housing-crisis-links-of-interest-93c4d41485d8>

City council should move on adding regulations not in a few months and not in a few years. It needs to be done now. The data is very clear where the housing inventory has gone and what could be done to put those units back on the market.

I was also disappointed that Mr. Duffy considered last night's meeting a "warm-up" after the issue had laid "dormant." I assure you, it hasn't been a "dormant" issue for the families and Islanders who continue to suffer at the hands of greedy commercial STR moguls cashing in on Charlottetown's previously reasonable housing prices.

My husband and I purchased a home in Hillsborough in 2015. We are so, so, so, so lucky that we bought when we did because if had waited a year or two, we would not have been able to afford to buy a home in Charlottetown, the city that we love. We simply would not be able to afford to live here and we would constantly fear being renovicted. The house next to ours is the same build as ours with a few upgrades and it sold over the summer for AT LEAST DOUBLE the price that we paid for our house—in a community that was once considered affordable.

I'm fine with owner-occupied STRs. Scenario 1 or 2 seemed reasonable to me. Whatever is done, it needs to be done soon. This has gone on long enough.

Thank you for your time.

Jillian Hamilton and Colby Cudmore

To re iterate a point I have previously made regarding this contentious issue- before Council finalizes its new regulations to limit the proliferation of short-term rentals in the city, due consideration must be given to its own role in contributing to the loss of a substantial number of downtown houses and apartments when, for years it turned a blind eye to the practice of the Great George Inn who were buying up and renovating a large number of neighbouring properties in order to increase their revenue/rental capacity.

This has set a precedent for others to follow and with the arrival of an ingenious, easy to use internet platform called Airbnb (which many hotels and bed and breakfast also use) you can hardly fault others for doing exactly the same - often purchasing and fixing up run-down buildings (vastly improving the appearance of some dilapidated city streetscapes) and attracting more visitors to the city centre.

If new restrictions include forbidding STRs to exist in apartment buildings and requiring an owner to be an occupant of their rental property, and this is universally and fairly applied and enforced, Council will be obliged to upset the owners of the Great George which would find itself in

contravention of such stipulations or you could "grandfather them in". This would then also have to apply to others who followed their example. Council must accept the fact that the current shortage of what would be considered "affordable" accommodation in the city is partly due to the lack of early action on its part to prevent it.

Joan Cumming

To Charlottetown Planning,

We have owned a home in the neighbourhood north of Euston for the last 10 years and love the area very much. In 2018, we moved from our house on Orlebar to Walthen st. mainly because an airbnb opened across the street from us and caused the following issues - Garage in front of the house, parties, parking in non-parking areas, excessive noise, etc.

Over the last 5 years, we have noticed more and more homes in our area being bought and rented out on AirBnb. We do not feel that this is benefiting the people who live in Charlottetown (especially downtown) and is making it almost impossible for our friends to afford to buy or rent in our area / rent spaces.

We want neighbours, not strangers or vacationers here to visit Charlottetown. We want kids for our kids to play with and go to the park. We want our neighbourhood to be safe and not have houses that are empty all winter.

We hope that you will consider 'owner occupied only' short-term rentals for Charlottetown. We love living downtown in this amazing city and hope that others can afford to live here too.

Sincerely, Julia and Rob Hartley

I am submitting my statement to you on Short Term Rentals for your consideration, in the hopes that you will pass regulations that will mitigate the already devastating effects of the housing crisis on Prince Edward Island.

There were a lot of excellent points made against STRs during the meeting in which Robert Zilke made his presentation, both by Mr. Zilke and by concerned citizens. Truthfully, I'm not well versed in legalese, but the proposals made by Mr. Zilke were straightforward and incredibly reasonable; therefore, the only reason I can think that someone might be opposed to it is for the purposes of lining their own pockets. I do not doubt that owners of STRs have spent large amounts of money on renovations for their units as many of them brought up during the meeting, however, renovations are regular costs of upkeep on a house in which any homeowner is responsible for upkeep. In many cases, and in many of the STR units in Charlottetown, STR owners have gone beyond renovations and upkeep and have spent exorbitant amounts on creating a hotel environment that is, quite frankly, unnecessary, and does not justify the commodification of housing in PEI.

I believe it was Terrie Williams, one of the STR owners, that mentioned she believed she was one of potentially 5 or 6 people on Prince Edward Island (or perhaps just in Charlottetown, even more concerning) that owned an equivalent of/or more than 4 houses, which to her was not unreasonable. Doing the math it, however, shows that between 5 or 6 people owning at minimum

4 houses (not counting their own housing and potential cottages) is at minimum 20-24 houses owned by a handful of people. If some of them own more than 4, it could be anywhere between 20 and 30 houses, on the shorter end of an estimation. This is utterly disgusting. Wealthy people that are becoming wealthier as a result of taking advantage of a market wherein the poor have no hope of succeeding should not be the benchmark on which we govern rules. For that reason, I highly recommend that if you would like to see citizens of Charlottetown and Prince Edward Island as a whole succeed, you must invest in the citizens that NEED support, and not in citizens that hold the tourism industry ransom from the place they claim to love.

Thank you,

Kassinda Bulger

As a senior and a resident of Ward 7, I am writing in support of the recommendation to Charlottetown City Council to limit Short Term Rentals (STR) to owner occupied premises. Contrary to the opinions of the STR operators who spoke at the public meeting on November 9, these units do contribute significantly to the lack of housing in Charlottetown. A significant amount of affordable housing was located in multi-unit dwellings in downtown Charlottetown. When these are purchased by investors and renovated into STR, they are removed from the available housing inventory.

It is difficult to feel sympathy for the STR operators as they each tried to portray themselves as being victimized and not being able to profit unless they own multiple buildings. The property they currently own is almost certainly worth more than they paid for it so crying "poor me" is meaningless.

Charlottetown is in a housing crisis. Housing is a right not a privilege. On Nov 9 those in attendance heard the privileged few speak against regulating STR. They have benefitted for several years from lack of regulations and it is past time that some rules were laid down and enforced.

My concern is that the STR owners will convince City Council to grandfather the existing units if the recommendation is passed. It is important that this does not happen as there is a substantial number of STR that could be converted back to long term rental units.

Charlottetown is a tourist destination – STR regulation will not affect that. As someone at the meeting pointed out, the City is beginning to look like a staged town. It is not a theme park – it is a vibrant, living community. At least it should be. The air of community is vaporizing as long term tenants are pushed out. Charlottetown City must limit STRs to owner occupied premises only. Once they become a multi-unit commercial enterprise there is no longer community.

Lack of affordable housing has brought this issue to the forefront. While this problem is multi-faceted it is nonetheless real and also needs to be addressed in concrete ways. It is time for the City to take action whether this is lobbying provincial or federal governments for financing for public housing or undertaking it as a City. The number of people struggling to survive is high. We cannot leave people without decent housing while STR operators make obscene amounts of money.

Thank you to Charlottetown City Council for listening to public input and bringing STR regulation forward. I look forward to hearing the decision.

Regards

Katie McInnis

My name is Kelly Robinson and I live in Charlottetown Ward One on Prince Street. Thank you for hearing my testimony at the consultation on November 9th and for taking time to read my letter.

I fully support the proposed STR regulatory framework as outlined in the document entitled: *Short-Term Rental Zoning & Development By-law Amendments* (File: plan-2021-04-october) published on **October 4, 2021**.

To those on Council, **I ask you to please vote YES for these regulations**. Further, **please vote NO to grandfathering existing STR units**.

I've worked in our non-profit sector my entire adult life and volunteered in my free time, devoting my energy to supporting Island residents to be safer and more well. Despite never owning property, I am a long-time contributing Islander and Charlottetown resident - I have more than pulled my weight as a community member and I hope my perspective and lived experience will be weighed as equal to the wants of property owners.

My years working with PEI People First taught me about life in this city for folks with intellectual disabilities and how marginalized peoples are the first to be unhoused; my time with the PEI Rape & Sexual Assault Centre, the PEI Advisory Council on the Status of Women, and serving on the Premier's Action Committee on Family Violence Prevention showed me how vulnerable people stay in dangerous relationships out of housing desperation sometimes with lethal results; my work with Community Legal Information Association taught me about the huge gaps in legislation and enforcement at the federal, provincial, and municipal levels to protect Islanders against housing insecurity.

As for me, despite working full time my entire life, despite having a living wage and living within my means, I am housing insecure. If I am evicted tomorrow, I will be forced to move in with my parents, impacting the retirement that they worked so hard for.

The housing crisis has many heads and residents need immediate and aggressive steps taken at every level of government. Getting the STR situation in Charlottetown under control has the potential of repatriating over 800 units to the long-term rental market. It won't solve everything, but it will make a huge difference.

If we do nothing or only take half-measures, we will lose an entire generation of young people. Nothing can keep people in a place if there is no where to live. When people are forced to pay 60-70% of their income to rent, they are not spending money in the community. And if families cannot afford nutritious food, extracurriculars for the kids, or other necessities, they are turning to NGOs and Governments to help. In other words, in the end, our economy suffers and we're subsidizing landlord profits instead of protecting our people.

Every great place is great because of the people who live there. Please put us before the escalating profits of a small few. Every Charlottetown landlord will still make profit. They will

simply make less. In times of crises past, Islanders have turned to and leaned in to protect their communities and vulnerable peoples. We need you to do this now. Please stand with the people who live here, we are desperate, we need your protection.

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Kelly Robinson

It is instructive to see what Hawaii's government is doing to address problems with Air BnB and operators.

Please consider registering all Air BnB and other short term renters using their companies to provide aid and information that will help your office regulate this "industry".

The rental housing crisis in Charlottetown and across the province is growing because there is a lack of planning and control by City Hall as to what to do with absent owners and short term rentals.

Whatever you do, I advise you to do something quickly or watch hotels and registered tourist accommodations suffer along with folks and families who cannot find decent, affordable rental properties in which to live.

Kip Smith

Attachments

APNewsBreak: Airbnb agrees to provide host records to Hawaii

By AUDREY McAVOYtoday

FILE - This Oct. 29, 2013 file photo shows people at Lanikai Beach, a popular neighborhood for vacation rentals, in Kailua, Hawaii. Airbnb Inc. is agreeing to provide Hawaii with records for many of its island hosts as the state tries to track down vacation rental operators who haven't been paying their taxes. Airbnb and the state Department of Taxation reached the agreement after negotiating the scope of a subpoena sought by the state. A judge approved the deal last week. (AP Photo/Audrey McAvoy, File)

HONOLULU (AP) — Airbnb Inc. has agreed to provide Hawaii with records of many of its island hosts as the state tries to track down vacation rental operators who haven't been paying their taxes.

Airbnb and the state Department of Taxation reached the agreement last week after negotiating the scope of a subpoena sought by the state. First Circuit Court Judge Bert Ayabe approved the agreement.

Ayabe still must rule on whether the state has met the requirements for serving the subpoena. A hearing before the judge has been scheduled for Wednesday.

The state needs the court's permission to serve the subpoena because its investigation targets a group of taxpayers and not specific individuals.

"We are pleased to have reached a compromise with the Hawaii Department of Taxation that provides adequate data to help them enforce against individuals who they suspect may have skirted tax laws, while including safeguards to further hosts' privacy," Airbnb said in a statement.

The company said it remains committed to working with state leaders to collect and remit taxes on behalf of hosts, which it says would generate \$64 million a year for Hawaii.

The state's court filing said it has struggled to collect taxes from vacation rental and bed-and-breakfast operators in part because many hosts don't generate enough revenue for Airbnb to send the IRS relevant tax forms for them. It also blames the relative anonymity hosts are given on the Airbnb website, where rental operators are often identified by a first name.

In addition, many Hawaii hosts have been illegally running their businesses without permits. Hawaii's counties issue permits for short-term rentals, and each of them has different regulations.

Honolulu, the most populous county, cracked down on illegal operators with a strict new law enacted earlier this year. Before this law took effect, Honolulu was estimated to have about 800 legal vacation rental and bed-and-breakfast units and about 10 times as many illegal ones.

Details of the agreement filed in state Circuit Court last week said Airbnb will provide the Department of Taxation with the records of the 1,000 hosts who made the most revenue from 2016 through 2018. The company will give these hosts two weeks' notice before it hands over the information.

Airbnb will provide the state with anonymized data for hosts who had more than \$2,000 in annual revenue during those years. The state may then request individualized records for these hosts, though it will be able to obtain information on only 500 hosts every two weeks.

If a host files a legal motion challenging the transfer of records, Airbnb won't provide the state with the data until the legal case is resolved.

The department cited statistics to justify the need for its subpoena. It said its investigation of 600 Airbnb hosts found many didn't have a license to charge the general excise tax, a state levy similar to a sales tax, or an account to charge the transient accommodations tax, the state's hotel tax.

Of about 500 hosts who received income from Airbnb, 76 percent had at least one delinquent general excise tax or transient accommodations tax return, it said.

Nicholas Mirkay, a University of Hawaii law school professor, said the agreement appears to be a breakthrough for the state so long as the judge finds Hawaii has a reasonable basis to serve the subpoena. Getting the taxpayer information will be huge, he said.

"Now they know who to go to. Up until this point, it appears that there's been a lot of taxpayers that would be subject to the tax but they had no idea who they are," Mirkay said.

Hawaii first sought to subpoena tax records from Airbnb last year. This initial request aimed to compel Airbnb to hand over a decade of vacation rental receipts.

But First Circuit Court Judge James Ashford denied that move in February, saying the state didn't sufficiently show that Airbnb users may have failed to comply with tax laws. Ashford said the state also didn't establish that the information wasn't available from other sources.

The state filed a new petition in June seeking approval for a revised subpoena. The department and Airbnb began negotiations after the second petition was filed.

The deal also calls on Airbnb to send a written notice to hosts who generated \$2,000 or less in annual revenue.

This notice will inform the hosts that they must obtain a license to collect general excise tax and a certificate of registration to collect the transient accommodations tax. The notice will remind hosts that they must file tax returns and pay taxes to the state.

Dear Planning committee,

I am writing to you today regarding the proposed changes for short term rentals (STRs) in the Charlottetown area. I would like to state that I agree with the changes that have been proposed but have some concerns with the limited application and scope of these changes and how they will be enforced. I would also like to make clear that the existing STRs should not be grandfathered into these changes and need further work by the council on how to deal with the gross number of STRs that have developed over recent years despite the housing crisis. Existing STRs that do not meet the proposed changes need to be converted to long-term rentals or sold within the year of these changes taking effect. I am sharing mostly from the student perspective as to why these changes are necessary and will speak to how STRs have been affecting both students and citizens in PEI.

A common misnomer used by STR owners in the attempt to justify STRs, is that eight-month rentals benefit students who leave during the summer. These leases are only applicable and beneficial for a very small percent of students, and this is for multiple reasons. Most STRs go until the middle of October, given this is when the tourism season ends in PEI. Therefore, those units do not convert to longer term leasing for students until the middle of October. Students start school at the end of August. Therefore, if we wish to lease one of these STR during the school year we would have to rent out a STR, stay in a hotel, or couch surf for an entire month and a half until a STR lease in October became available. This is less than ideal and so students will not lease STRs like this unless they absolutely must because it is very inconvenient to move in the middle of the semester, but it is also extremely costly. The overwhelming majority of students will try to seek housing that starts at the end of August for these reasons, therefore, making STRs not student friendly and the STR justification baseless. Our vacancy rate in Charlottetown is 1.2% according to the presentation given at the last meeting, which is one of the lowest in the country and below the recommended 3% that signifies a functional market. Unfortunately, because of this vacancy rate, I know multiple students who have had to pay absurd amounts either for a hotel or STR for a month and half at the beginning of the semester until the longer leases open up in October, or are asked to pay the profit STR operators would lose out on in order to secure a lease

starting at the end of August, and do so because there is no other option. This is despicable behaviour; as students, we are already some of the lowest in financial security, socioeconomic class and have the highest amounts of debt, and so should not have to bear the financial burden for the lack of housing available that is directly related to STRs. The housing crisis is multifactorial, but STRs are a huge proponent of this problem and directly impact students in terms of being able to find affordable housing.

Furthermore, university is the time in your life where you are branching out on your own, figuring out who you are, and seeking employment in the summers that may relate to your future career. At a minimum, however, students seek employment to help offset the cost of the upcoming school year. This means that a lot of students wish to stay in Charlottetown during the summers because of the career opportunities provided by the institutions here that might not be available elsewhere. But also, our booming tourism industry produces a lot of jobs in the summer that need to be filled by minimum wage workers and are primarily targeted at students. This being said, if your lease ends at the beginning of May, and there are no new leases to sign on to, you cannot live in PEI during the summer unless you rent a STR yourself which is not an option due to cost. According to the data collected by the planning committee the average number of housing units converted to full-time STRs in Charlottetown was 55 in 2017, 125 in 2018, and 138 in 2019 (but rose to 193 during the summertime). That is a total of 318 full time rentals taken off the market since 2017, which means 318 less places for students and citizens to live year round. This is not considering how many people these places could house with regards to individual bedrooms. Therefore, STRs directly take away long-term renting opportunities which prevents students from contributing to the PEI economy and potentially even blocking them from engaging in opportunities that could directly impact their careers. I know multiple students from the vet college alone (where I am a student) who have had to leave during the summer due to lack of housing, despite wanting to stay here and engage in all that PEI has to offer. This is not only impacting the ability for young people to succeed, but it may be a contributing factor (along with the embarrassing low 'living' wages in PEI) regarding the so called 'labour shortage' often spouted by PEI media. You cannot work in PEI if there is no where to live, student or otherwise, and having stable housing year-round is a must if you plan to remain a citizen of an area.

The unstable housing market and low vacancy rate partially created by STRs also deters young people from moving here or staying after graduation to contribute to the workforce. There are also many young people with careers who have had to leave PEI due to the lack of affordable housing. If PEI cares about tourism dollars more than the interests of the younger generations, all they will be left with is an aging population with huge personnel shortages for not only tourism, but other necessary services to live and function as a society. Therefore, by STR owners taking away this much year long housing from citizens, they are directly impacting the careers of young people and potentially the livelihood and functioning of the entire population long-term.

The report released by the planning committee also demonstrated that STRs are responsible for 38% of all rent increases in Charlottetown since 2017, with the growth of STRs in Charlottetown costing the average Charlottetonian renter \$292 since this time. By causing a shortage in units available, the remaining rentals skyrocket in price as landlords gain leverage to ask for higher rents due to supply and demand. While it is great that tourism provides for this province, it is unethical and negligent of governing bodies to prioritize tourism revenue over the

citizens who live in this province and make the economic benefits of tourism possible. STRs are directly impacting both students and community members by taking away long-term rentals and increasing the rent of those units left over. It is completely immoral and downright evil to force the poorest of people to take on extra financial burden just so that the rich can continue getting richer. The planning committee report demonstrated in 2018 alone, STR owners made 8.5 million (averaging \$13,400 per listing but as high as \$400,000\$ per listing). When compared to other cities in Atlantic Canada, Charlottetown was found to have one of the highest profits per listing despite having one of the lowest numbers of listing per 1000 households. Further, if you take the host revenue made in 2019 and divide it by the estimated city populations of these places, Charlottetown has the highest per capita revenue, indicating that the profit made here from STRs is disproportional to that of other cities in Atlantic Canada (Table 1). To be clear, no one is saying STR owners cannot make money from properties. There is profit to be made off of long-term tenants; I have paid over \$50,000 in rent alone in the four years of being in Charlottetown, and this is with having roommates. We are just asking that extra profit and greed to not be valued over providing the basic human right to affordable housing and shelter for the citizens of this province. This is exactly what has been allowed to happen in Charlottetown, and it needs to come to an end by passing these new regulations on STRs and changing any existing STRs that do not meet the proposed changes to long-term rentals.

We understand that reversing some STRs alone will not fix the housing problem, but it will provide some immediate housing, and this is a huge start to addressing the housing crisis. The John Howard society point-in-time homeless count in 2018 determined the number of homeless individuals in Charlottetown alone to be roughly 118. Likewise, the Community Outreach Center has seen an increased demand over the last few years for overnight shelters and other services for poor and marginalized islanders. Given this information and the state of the housing crisis, it is no surprise that there was an estimated 75% increase in the number of homeless islanders compared to 3 years, numbers that were released in a media report just last week. This drastic increase was likely created by the pandemic lay offs, simultaneous skyrocketing rent and 1.2 % vacancy rate for long-term rentals. Furthermore, the planning committee reported “that of the 635 active STR listings on September 1, 2019, 342 (53.9%) listings were likely operated in their hosts’ principal residences. This means that just under half (46.1%) of listings active on that date were operated out of non-principal residences” and would not meet the proposed changes put forth by the committee. Therefore, if these STRs that do not meet proposed regulations were changed to long-rentals, that is 342 new long-term residences that could be used to house every single homeless individual in Charlottetown, as well as provide housing security to other islanders who are displaced in the summer months. Thus, the existing STRs that do not met the regulations should be changed to long-term housing as they have the potential to better the lives of many islanders by providing more long-term housing and stability to the rental market, and would also help increase the vacancy rate for future islanders.

By allowing these STRs to go unregulated for all these years and allowing 318 rentals to be taken from the long-term rental pool, the governing bodies have prioritized extra profit and greed over the security and well-being of their own people. This has been through displacing citizens and students, causing extra financial and emotional stress due to increasing rent and extremely low vacancy rates, and even putting the future of this province in jeopardy by chasing young

people away. Thus, the proposed changes by the committee need to be passed and enforced. This includes regulating the existing STRs under the proposed changes, as these rentals, if changed to long term housing, have the potential to put an immediate dent in the housing crisis and guarantee a better future for all islanders, not just STR operators. I will finish this letter with a question that needs to be clarified to the public when it comes to finding a solution to this problem: How are you going to enforce these new regulations if passed, when more than two thirds of listings (570) are not registered, and are therefore non-compliant with the Tourism Industry Act already? I hope that you deeply consider what I have written here, along with the many other letters and emails you will have received by passionate young people who are just trying to secure a future for themselves and their neighbours in a province we all love.

If you have any questions regarding the contents of this letter, do not hesitate to reach out.

Yours truly,

-Kylee Graham (AVC class of 2022)

City	Active listings	Listing per 1000 households	Host revenue (2019)	Revenue per listing	Estimated <u>city</u> population	STR revenue per capita (Host revenue in 2019/ estimated city population)
Charlottetown	635	12.1	\$8.5 million	\$13, 400	40, 000	212.5
Halifax	2, 483	13.2	\$34.3 million	\$13, 800	202, 000	169.8
St. John's	982	18.8	\$10.3 million	\$10, 500	108, 000	95.37
Moncton	377	10.7	\$3.7 million	\$9,800	75, 800	48.8

Table 1. Modified from STR activity in the top five Atlantic Canada cities (excluding Lunenburg)

References used in this letter

Statistics Canada

https://p1cdn4static.civiclive.com/UserFiles/Servers/Server_10500298/File/Mayor%20and%20Council/Council%20Meetings/Short-term%20rentals%20in%20Charlottetown%20-%20UPG%20McGill,.pdf

(<https://www.homelesshub.ca/community-profile/charlottetown>).

(<https://www.saltwire.com/prince-edward-island/news/salvation-army-has-asked-to-be-replaced-as-manager-of-charlottetown-community-outreach-centre-100655963/>)

(<https://www.saltwire.com/atlantic-canada/news/latest-pe-i-snapshot-puts-number-of-homeless-at-147-100658328/>).

Dear Mayor Brown and City Councillors:

My story: Read if you wish or skip down to the fourth paragraph.

My family moved here in 2010, leaving a city (Victoria, BC) wherein we couldn't afford to purchase a home and so much of our income went to housing. We wanted a place to raise a child and potentially retire. It was such a relief not to encounter the rampant homelessness and increased vulnerability of people that was so visible, and increasing, in Victoria.

Fast-forward to 2014. Walking my dog in the North of Euston neighbourhood (where we bought a home), I am aware of an increasing number of houses on our walk that have been turned **into STRs**. I called the province and the city to ask if any rules or guidelines existed to limit the number of these businesses on residential streets. Both sounded surprised by the question and had no answer. **I counted 13 in a five-block radius from my home.**

In 2017, I needed to move from the family home. I wanted to be able to have my daughter and dog with me and to live in the neighbourhood in order to maintain strong co-parenting ties and the least amount of disruption for my child. It was scary. I was able to do it until this past summer, when I had to vacate the duplex I was renting and couldn't find pet-friendly accommodations. Had I been a single-parent, I don't know what I would have done with my dog. Keep in mind that I have a good income, pay for 50% of my health care premiums, and, with no pension, hope to contribute to my RRSP each year – and I was worried and scared. I have also had a student living with me: not because I wanted a roommate, but because she needed an affordable, safe place to live near Holland College.

My point:

I strongly support 'option 1' for short-term rental regulations, as presented at the community meeting on November 9th, 2021, at Confederation Centre of the Arts. I am also **opposed to any grandfathering** of existing STRs that **did not comply with existing zoning bylaws**. If they claim to be businesses, then they don't belong in areas that were not zoned for stand-alone businesses. Investing in real estate comes with risks, as does investing in any other market: it's a gamble and not a guaranteed payout.

If there is a compelling argument for allowing residential housing stock to be used for other purposes, especially during a housing crunch, I have yet to hear it. Transients or people planning to move to PEI can be housed in many of our existing tourist accommodations, which is what happened prior to the introduction of disruptor industry platforms for vacation rentals.

Thank you for listening. I have attended every community engagement meeting on the topic: from the well-attended March 2020 in Memorial Hall to the STR-operator boycotted/police at the door meeting in May 2021 in the theatre at Confederation Centre of the Arts to the very civil meeting this past Tuesday. I hope that the recommendation of the planning committee, as presented, is passed.

Sincerely,

Laura K. Bird

I am writing to you provide some additional brief feedback on the STR Consultation. I was able to attend the STR Consultation meeting at the Confederation Centre on November 9. Many of the speakers who spoke in favour of Option One made points that I would echo including remarks by people like Bob Gray and Bill Campbell and many others. The frustration expressed by some people related to the long delays due to Covid-19 etc on making decisions on this file particularly as the growth of STRs occurred over a period of time when it was not permitted under existing rules and bylaws that were not enforced. I think greater regulation and greater recognition of the growth of these STR's on the ongoing housing crisis as evidenced by the research by The Professor Wachsmuth from McGill and also found in the recommendation from your Planning Officer Robert Zilke.

I am a resident of Charlottetown and want to make the following observations:

- 1) I support and uphold the knowledge and analysis made that concluded Option 1 should be the correct option and the attacks on the Planning Officer were both unfair and done in a very self interested manner by some STR operators and I uphold that decision and analysis provided by the Planning Officer.
- 2) I know some of the STR operators who have had quite a number of STR operations under way before Covid-19 have in fact may have gone the route of longer term rentals now due solely to the tourism economic downturn but should not be allowed to grandfather their STR properties in violation of the rules in place and the new suggested bylaw option.
- 3) i was concerned that in a number of comments from some Charlottetown Councillors in the media and other sources seemed to imply (and I apologize if I misunderstood) that their final decision should be made by weighing the argument and debates and come down somewhere in the middle between those two points of view. I would like to say that the final decision should be based by any decision maker on the basis of the best evidence available to them and I think that the best available evidence as well as public opinion is solidly behind selecting option number one. The arguments made in favour of STRs seems to be mostly self interested and not in the long term interests of having Charlottetown meet the needs of its neighbourhoods, its citizens and maintain the long term viability of a vibrant City which is inclusive and welcoming to all including students, seniors and lower paid service workers. Charlottetown must remain an affordable and accessible place for workers and citizens continue to contribute to the needs of all its populace not just profit margins of those who want to maximize profits at the detriment of others.

Sincerely,

Leo Cheverie

I am emailing today to express my support of regulating short-term rentals in the City of Charlottetown. I am advocating that Council approves a regulation scheme that takes immediate action to protect existing, long-term housing in our communities. Research on this topic across the world has indicated that short term rentals have an impact on city affordability and housing supply.

I am in support of an owner-occupied regulation within the City of Charlottetown. Residents can still list their primary residence while curbing the influx of commercial rental units in our neighbourhoods.

We have voted for our councilors to represent community members, so please advocate for us on this topic.

Thank you for your time,

Luke Crawford

I would like to add my voice to this controversial issue.

The Urban Politics and Governance report has provided us with a clear picture of the extent to which the STR business has taken over our city. The ability to capitalize on a housing investment has appealed to many Islanders and they have taken to the business in a big way. Not all of them following regulations apparently, as shown by the large number of unregistered sites.

What the housing crisis and the UPG report have revealed is that our city is being turned into a fractured hotel and no longer a welcoming group of neighbourhoods surrounding a downtown core. While our tourists are thrilled at the varied accommodation available, their holiday gatherings and festivities are not always welcome by the local citizen who happen to be living out their lives with their families in the adjacent homes.

The citizens of Charlottetown who have purchased a condominium, find themselves confronting strangers at their front door, in the hallways or parking areas, creating an unsettled atmosphere in what should be their neighbourhood.

The apartment dwellers, paying rent for what should be a secure environment, instead are never sure of who else is occupying their building one night to the next, again feeling unsafe in their own home.

The homeowner who has invested significantly to become part of a neighbourhood, instead finds a revolving door of visitors next door or up the street.

Not only have the unfettered expansion of these STRs created an indisputable shortage of housing in the city but they are also changing the feeling of neighbourhoods which gave our city that special vibe that is attractive to visitors.

I feel the tourists could be provided ample accommodation in the registered, legitimate tourist facilities and hotels in the city without turning every building into Airbnb units operated by investors.

It has been a long standing occurrence for homeowners to rent out their residence for the summer while away on vacation or at a cottage. But in the past people would rent out their home "for the summer" not on a nightly basis. Allowing the rental of a principal residence, for whatever term, would free up just under 50% of current (2019) STR listings for full time rental or homeownership. A much better fit for our city.

Of the options that were provided by the UPG report, I feel the best scenario for Charlottetown

would be Scenario #1 - principal residence only, no apartments, banning all non-principal-residence and apartment listings.

Thank you Marie Ewing

Hello,

I would like to suggest that strict rules be put in place regarding short-term rentals in PEI. The main priority across the province - but especially in Charlottetown - should be to ensure that low-income residents can find affordable long-term housing in and around the city of Charlottetown. Not only is this the right decision from a humanities perspective, but many folks have the wrong idea in their heads when they hear the term low-income residents. Low-income residents include people from all ages and walks of life who contribute to the daily operations, the vibrancy and the beauty of our small and tightly-knit community. If the artists, musicians, actors, craft-makers, essential workers, the students, the young people just entering the labour market, and our elders are all forced to move to another place with cheaper rent, then it will be to the detriment of all of the businesses that rely on that vibrancy, beauty, and character to attract tourists.

It is widely agreed upon that people should spend no more than thirty percent of their income on rent. The federal government has determined that the minimum amount of income needed to survive in Canada is about \$2000 per month. This means that a single adult should be able to find a 1 bedroom apartment (not just a single bedroom in someone else's apartment) for around \$600 per month. This is far from the reality we see here today at \$900-\$1000 per month on average. Either the province must take steps to ensure that rental prices come down, or they must implement a universal basic income which enables residents to afford the steadily rising cost of rent.

The low-income residents of a community often function as the conscience, and the moral fiber of a community, since they are most often the ones who are affected by bad policies and lack of oversight. Listen to your low-income residents. They are speaking to you.

Sincerely,
Matt Bridges

I am a cottage owner who rents seasonally out on the north shore. To be "street legal" with Tourism PEI I have to fulfill a variety of stringent requirements in order to run my business, and pay a yearly license fee. It continues to be my understanding that this is not the case for everyone running an AirBnB. On top of that, I know a large number of friends in Charlottetown who have been displaced by renovations and a shrinking rental market.

I don't know what the solution for Charlottetown is, but I do know that when I was younger, being able to afford to live relatively close to the cultural attractions of town is the only thing that made it worth living in Charlottetown/the Island as a young person. If all of our young people and young families are pushed past the suburbs and beyond, this won't be a town worth visiting or living in. People will go elsewhere, and PEI will suffer for it. AirBnBs in town should be strictly regulated, they should be required to show proof of business insurance, they should have to fulfill all the requirements of any other tourism rental operator, and they should be sure they're paying all the

proper taxes. If people want to rent out their extra bedroom or ensuite, that's one thing. But taking whole houses off the market is going to hurt Islanders the longer it continues unabated.

Thank you

Matt Steele

To: Alanna Jankov,

I write to you as a resident of downtown Charlottetown, and in support of the proposed Short-Term Rental Zoning & Development By-law Amendments—October 4, 2021. I encourage you to vote in favour of the regulations.

In recent years, I have been forced to confront the possibility that I may not always have a place where I have always so proudly called my home. I can only imagine the case if this situation is left to fester.

I hope that you will see the proposed amendments as imperative to protecting the future of Charlottetown. Maintaining our path toward continued precarious—or complete lack of—housing is untenable for the City, and those who so desperately wish to call it home. I hope that the future of Charlottetown, as well as those who live here and contribute in their many ways to our neighbourhoods, will be at the forefront in your decision making—and that you will vote yes.

Respectfully,

Matthew Richard

I spoke at the meeting on Short Term Rentals last week but still wanted to submit my comments through email, and have an additional and important point to bring to your attention.

My partner and I have a duplex home where we live in the lower floor (2 bedroom apartment) and rent out the upper floor through Airbnb (2 Bedroom apartment).

We have loved our experience with Airbnb but have seen its huge growth and see the detriment to community when it is not properly regulated. I believe in prioritizing community wellbeing over and above prioritizing profits of those who can afford multiple dwellings to rent out to tourists. As more houses go up in our neighbourhood, we hope they will be purchased by future neighbours who will contribute to our wellbeing and the wellbeing of our children and community.

I also wanted to highlight a group that suffers due to lack of affordable housing that has not yet been addressed. We are foster parents and thus hear about some of the situations that occur with vulnerable families and children in PEI. One situation is when a parent has taken steps to be able to regain custody of their child(ren) but they are not yet able to do so due to lack of housing possibilities. Another is if one parent wishes to leave an abusive situation and they have nowhere else affordable to live, it results in more children coming into care as they cannot remain in that abusive situation. Here we see a negative impact of STRs on the islands most vulnerable children. This is happening in our community today, and will continue until action is taken to restrict STRs.

I believe that this crisis has an impact on the wellbeing of so many community members and believe that options 1 or 2 should be implemented.

Thanks,

Megan Burnside

I am writing to voice my support for the City FINALLY creating STR regulations. Lack of affordable and safe housing is a critical human rights issue in our City. I am also deeply shocked and angry that Councillor Greg Rivard has benefited financially from his role on City Council and is now in partnership with Developer APM. The optics on this are entirely unethical; he clearly had a conflict of interest when making housing decisions.

I applaud the work done by City staff in response to the recommendations. It is time that the basic needs of everyone are given precedence over the profit of a few.

Thank you,

Michelle Jay

Dear Mr. Zilky and Planning Office,

I missed the presentation to your office by the Short Term Rental Association. My partner and I do rent out our Charlottetown property during the summer when we move to the country.

While I am part of the STR Association I do not share all of their views so I thought I would pass on my comments as well.

I do not like the idea of grandfathering in existing operations and having tighter controls only apply to future property owners. This is discriminatory to future and younger generations and would create challenges for enforcement. I am not aware of other jurisdictions that are offering grandfathering clauses and would discourage you from including one.

I would like for you to recognize the difference between residing within the unit and residing within the building. Many people have a house which may have a secondary unit. I would propose that as long as property owners reside in the building the building would be viewed as owner occupied. This distinction would still allow property owners to help finance their home using STR but would still prevent people from managing multiple buildings.

I share the concerns that many have expressed over houses being converted for the sole purpose of STR, in doing so some buildings are made into multiple smaller units which are not necessarily suitable for longer term occupation which may limit their future potential.

Young people are being priced out of the housing market across this country. STR can allow young people to get into the housing market but if home sharing is the only option it will not help young families but if they could be renting an auxiliary unit within their home it could.

I wish you the best of luck and courage as you develop the policies for Charlottetown around this issue.

Sincerely,

Mike Gibson

I am writing to provide my feedback on the proposed regulatory approach to short-term rentals in Charlottetown.

I am happy to endorse the City's proposed regulatory approach to short-term rentals.

This approach is appropriate in a number of ways:

- 1) it preserves the residential character of Charlottetown neighbourhoods¹;
- 2) it will meaningfully address issues of rising unaffordability; and
- 3) it achieves the best balance between the competing interests of housing and supporting tourism and economic activity.

I also believe this new regulatory approach **must not grandfather existing commercial short-term rentals**; to do so would be a failure to address the negative impacts they have had

on our community, and would reward commercial operations that to-date have not complied with existing municipal bylaws. I strongly hope that this issue will be included and addressed going forward. Below, I have provided some brief thoughts on short-term rental regulation that I hope are useful in your deliberations on regulation.

Housing Impacts

Regulation will have an important impact on housing in Charlottetown, both in terms of supply and affordability. Ensuring Charlottetown remains a great place to live, work, and play requires that Council end speculative activities that harm our local housing market.

Preserving our existing supply of affordable housing is key to keeping housing prices low and accessible. Across the country, we are seeing affordable housing units leaving the market at a rate that exceeds the number of affordable housing units we are putting on the market—there is no reason to believe that PEI is any different. Commercial short-term rental activities have a direct negative impact on local housing. Very few (if any) commercial operators build purpose-built tourism accommodations. This means they are largely buying existing housing in Charlottetown to convert for use as a short-term rental.

Typically, this results in the acquisition of “underperforming assets”, where the rents and profit extracted are not maximized by the current owners.

Because commercial operators are motivated by profit rather than a need to put a roof over their heads, they are much more willing and able to pay more for these units than other prospective buyers like a first-time homebuyer or a senior. This is because the operator will make profit on top of their expenses, whereas a first-time homebuyer or senior will generally just pay their expenses of living in the home with no expectation of revenue.

With commercial operators exacerbating demand for housing increases, housing prices will continue to inflate. And because of renovations that so often occur in these units after they are purchased by commercial operators, these units will no longer be accessibly priced if or when

they return to the market for sale, and it will also force some Charlottetown residents to relocate out of their community.

From a rental perspective, the profit motive means operators will charge greater rents (which they can justify at IRAC) because their costs—like mortgage, renovations, and other upgrades—are greater than they were pre-acquisition. And, as if exorbitant rents weren't enough, commercial STR operators will use 8-month leases to evict students and other tenants in the spring and maximize revenue in the summer. This can lead to Charlottetown residents being left without housing in their own community. Though operators will suggest this creates a convenient arrangement for students particularly, that argument has been rejected by student leaders and also fails to consider that nearly half the UPEI student population enrolls in summer courses.² Commercial STRs detrimentally affect affordability by making it more difficult and expensive to buy a home and to find secure and affordable rental units when operators charge excessive rents and remove units from the market. Operators are correct in saying that STR regulation has little to nothing to do with the construction of new affordable housing (though I'm not aware of anyone making that argument). But that is not why I and many members of the public want regulation; we want it to **end speculative activities that remove existing affordable housing** from the market.

¹ See also the November 18, 2019 decision by Ontario Local Planning and Appeals Tribunal in case PL180082: *[105] The Tribunal accepts the unwavering evidence of Ms. Samuel that “the PR requirement keeps the use residential.” Its effect is to establish the dwelling unit primarily as a place of residence for residents, and only secondarily, as accommodation for visitors or persons otherwise away from their normal place of residence. The PR requirement is not new to the ZBL. It is employed in the regulation of home occupations, tourist homes and day nurseries in residential areas.*

Tourism Impacts

There have been a number of concerns expressed by short-term rental operators that regulation will hurt our tourism market. In fact, it might actually make our tourism industry more efficient, while preserving housing for residents.

To this end, it is helpful to consider pre-pandemic trends where the Province was operating normally, not limited by travel restrictions relating to the COVID-19 pandemic. (It is also worth noting that the Province was experiencing successive record-breaking years with respect to tourism performance.)

Using 2017-2019 data from the Department of Economic Growth, Tourism and Culture's *Prince Edward Island Tourism Indicators*, it is notable that, while the number of short-term rental units had increased, tourism accommodation occupancy rates³ in Charlottetown had decreased. In the months of May-August, the traditional “sweet spot” for short-term rentals⁴, the occupancy rate in Charlottetown has decreased from 70.4% in 2017 to 65% in 2019⁵,

despite an increase in room-night sales. In other words, the supply of short-term rentals added to the tourism accommodation market exceeded the demand for these units. As a result, when averaged out over May-August 2019, 33% of Charlottetown accommodation units were unoccupied on a given night.

Provincially, the May-August occupancy rate of tourist homes had also decreased, from 53.9% in 2017 to 46.8% in 2019. Total room-nights sold, averaged over that same monthly period, had decreased from 8,636 in 2017 to 7,939 in 2019. This challenges the narrative that tourists are increasingly looking for tourist homes.⁶

By limiting the expansion of short-term rentals, we will be able to direct more business to existing tourism establishments and make better use of our existing capacity. It will also make the sharing economy model more viable for Charlottetown residents seeking supplementary income by maximizing the use of their primary residence.

² See the Official Opposition's "Putting People First: A Housing Strategy for Prince Edward Island": https://storage.googleapis.com/wzukusers/user-32195115/documents/0617a67f7b2c40c1959895f445e31_9_b9/Putting%20People%20First%20-%20A%20Housing%20Strategy%20for%20Prince%20Edward%20Island.pdf

³ The percentage of room-nights that are occupied (sold) out of all room-nights available.

⁴ Many short-term rental units will be rented out on a longer-term basis from September to April, with tenants evicted at the end of April so the unit can be used for a short-term rental purpose.

⁵ See *Prince Edward Island Tourism Indicators*, December 2017 - October 2019.

⁶ In fact, the Economic Policy Institute's report, "The Economic Costs and Benefits of Airbnb," cites research that indicates that 96-98% of Airbnb rental accommodations are ultimately substitutes for other accommodations. In other words, these operations are generating almost no new business - they are simply displacing existing business. See: Josh Bivens. "The Economic Costs and Benefits of Airbnb." Economic Policy Institute. January 30, 2019. Available here:

<https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-no-reason-for-local-policy-makers-to-let-airbnb-bypass-tax-or-regulatory-obligations/>

NO Grandfathering

Under NO circumstances should existing commercial short-term rentals be grandfathered under a new municipal regulatory regime. As someone who has FOIPPed thousands of pages of records from the City on STR regulation, one of the few constants has been the opinion of the Planning Department that under the City's present bylaws, if an STR is not in a single-detached dwelling and is not owner-occupied, it is **not permitted**.

In a general sense, grandfathering happens when a **previously permitted** use or activity is no longer permitted under a new regulatory regime. This is not the case for many of the STRs that have been operating in our community, which have not been operating in accordance with municipal requirements.

Not only, then, would the grandfathering of these units contrast greatly with the traditional use and purpose of grandfathering generally, it would also permanently remove hundreds of units from the long-term rental supply. For these reasons, I strongly urge the City to require ALL tourism accommodations to comply with the new regulatory regime for tourism accommodations.

Final remarks

I would like to express my gratitude to the planning staff, and in particular Robert Zilke, who has been diligent in presenting clear information to the public on the effects of short-term rentals and the options for regulating STRs.

I have been extremely disappointed with the conduct of some short-term rental operators who have sought to cast aspersions on Mr. Zilke's work, and I was glad to see members of Council push back on some of these unfair criticisms. It was disrespectful, and their views certainly do not represent the general opinion of the public.

I hope and trust that Council will make the right decision: that it will listen to and prioritize those fighting for their neighbours—not those fighting for their profits—and regulate short-term rentals in the proposed manner with no grandfathering.

Good luck!

Nathan Hood Ward 3

Members of the Planning and Heritage Committee:

I know you will hear a lot of comments from the perspective of the tenants, and you will definitely hear from the vocal minority of STR owners. I wanted to offer some perspectives you might not be hearing much of, including homeowners who may want to be in your city, contributing to the local economy year-round, but who have effectively been priced out, given the current housing shortage. To start with, I'm a former resident of Charlottetown. I have lived in several wards, and have also owned a home in the city. In the time since I moved away from Charlottetown, I have periodically been an employee working in Charlottetown, and have also attended school programs there.

I have considered relocating back to your city for a few years now, but with the prices so inflated and the market moving so quickly, it seems like an unwise decision. As someone who currently owns a home, I could afford to purchase in Charlottetown. The bank would happily hand over the money. However, for most Islanders considering the move to Charlottetown, relocating would require taking on a mortgage that is much more costly than is reasonable for the quality of houses on the market. The current prices for housing are very extreme compared with the wages of a typical Islander, even for those making good money for the region. It's not desirable, and it's just not sustainable. These artificially rising prices affect home owners and tenants alike, who are forced to reprioritize their local spending, with a much larger percent of their income going towards housing than is recommended for financial security. Also, while interest rates are low today, that could change at any time, and we've seen how things go when mortgages turn top-heavy.

I know there are many who would choose to live in your city if it were feasible. They would be contributing to the local economy, to the community, bringing their labour (as workers, as volunteers, as contributors in so many ways), their skillsets, their businesses, their families and contributing to the culture of the city. We are effectively losing these potential members of the community right now. It's hard to quantify how many would otherwise be contributing to the local economy in ways tourists don't, and certainly more consistently.

Many of the comments I've heard from STR operators have been troubling. For one thing, they've referred to their business as though it is revitalizing the city, but they are minimizing the damage this so-called "revitalizing" does. When I moved back to PEI in 2003 from Calgary, one of the reasons I returned was the impact of being in and around the beautiful older homes in the downtown Charlottetown area. They had so much character, so much vibrancy, so much history, just like the city itself. Mass renovations lead to soul-less, cookie-cutter, indistinctive units instead of inspiring living places. These renovations also arbitrarily raise the cost of living. There was also great arts scene when I moved to the city, with many of the artists living downtown. This was a big draw for me. Charlottetown, at the time, was renowned for being a must-stop place for great Canadian musicians on tour. Many of the local artists whose work I've followed over the years have since left the city, as it is no longer financially feasible to live there. This might not seem like it would have a big impact, but it very much does. When you're looking to draw skilled workers and/or businesses to the region, the arts scene and local cultural activities have a big impact on where they choose to relocate.

I also wish to address the false perception that being a landlord should be a way to make a

quick buck. This is a relatively new perspective. In the not-too-distant past, it was well-understood that rental units were primarily for building long-term equity. Ideally, costs related to the property would be covered by rent, while the property itself rose in value over time. The property itself was the nest egg, and it was considered a relatively stable, long-term investment. This typical model allowed for the accumulation of assets, while still offering reasonably accessible living costs to those in need of housing. The current model, on the other hand, is absolutely not sustainable.

With the influx of STRs on the market, and the associated constant flipping to make quick money, a handful of people (and corporations) may be cashing in, but they're removing hundreds of livable spaces from the market. This comes at great expense to the citizens, the local businesses (who are dealing with relatively empty neighbourhoods), and to the community as a whole.

Please, also consider that those who are in unhealthy home situations (or even those who simply wish to leave their situations), are at a disadvantage when there are limited rental units available at a reasonable price, and no other homes they could afford on one salary.

I appreciate that the city staff members have done their due diligence of putting forward a well-researched recommendation, and hope the committee will opt to follow the proposals within. This situation is already too far gone to consider part-measures, including "grandfathering." Those who are already operating in opposition to the current by-laws should not be rewarded for disregarding the law. Aside from their willingness to operate outside of the law, at the very least they either knew – or should reasonably have known – that their business model was risky. Regulations and restrictions on the operations of STRs have long been in place in many cities throughout the world, and further restrictions were easily foreseeable.

I know you're dealing with a very vocal STR ownership association, but please don't be swayed by their distorted, handpicked statistics that don't actually tell you anything about the situation. The figures I've seen that they've chosen to share are carefully selected so that they don't actually reveal the extent of the issue: the vast amount of homes that have been taken out of circulation. Homes that should have remained available for *long-term, all-year-long* housing. While the folks who suffer the most in a housing crisis are the precariously housed and other members of the vulnerable populations – and this should be reason alone to address the inequity – they're not the only ones who suffer in a crisis: we all do.

In case the rest of my letter is unclear, I believe STRs should be limited to one's primary residence, if at all. I would strongly discourage any version of "grandfathering-in." I believe the crisis needs to be addressed now, and decisively. Please ensure that these units go back to being available for long-term housing.

Thank you for your consideration,

Nikkie Gallant

I am a resident of Ward 4 in Charlottetown. I have lived, studied, worked and loved our city my entire life. The last few years have seen an increase in the number of Short Term Rentals in our city and in the downtown neighborhood I grew up in. This has had a significant impact in our community and neighborhoods. We no longer interact, care for and rely on our neighbors like we did growing up as they're not there anymore. Instead of regular, long-term residents, more and more houses have been purchased and used as Airbnbs.

Outside of having a dramatic impact on our community, it has also raised housing prices in our neighborhoods astronomically. Saltwire has said that homelessness in Charlottetown has been raised 71% in just the past three years (referenced below). The rise of housing costs and homelessness has been shown to have a direct and significant link to the rise of short term rentals. They have taken valuable long-term rentals out of the market as well as driven up costs to unaffordable levels. We have heard that PEI now has Toronto prices for housing but the food costs are higher. Toronto pricing in a city that has more options for employment and a significantly higher minimum wage. We are putting our most vulnerable community members at risk by not regulating short term rentals.

I am in favor of Option 1. No other option should be satisfactory to anyone who is aware of the significant struggles that our community is facing.

When we regulate housing, we are not only opening up more housing in Charlottetown and hopefully drive down pricing but we know that having safe, affordable housing options also supports those in mental health crisis, improves the economy and results in a healthier and happier community.

We are in our current situation because of the lack of enforcement for the rules that were already existing. If you fail to introduce Option 1, you are not only telling your community that you don't care for wellbeing but you are confirming that you don't represent them. I was at the November 9th 2021 consultation, overwhelming, everyone in attendance was for Option 1.

I am, as well as countless others in the community, strongly against the grandfathering of STRs. I hope that this will not be considered, as it shouldn't be. Those profiting off of the current housing crisis and turning long-term housing into short-term rentals, should not have the benefit of conducting business at the expense of our community. Like any business, this one too has risks. Regulating was the risk, which we all hoped would be coming. Their business should not be at the detriment of others. If their business was to poison the water, it wouldn't be permitted to continue and wouldn't be grandfathered in. This is poisoning our community and literally killing community members.

Thank you,

Nouhad Mourad

Hi I wish to express my opposition to the short term rental option. I currently reside at an apartment complex which chooses to utilize this option. I strongly oppose this as I do not wish to live in a hotel; if I did I would have chosen that option.

I do not like the disruption involved with short term renters nor the possibility of inviting unwanted pests and drug peddlers. Allowing short term renters in precipitous both of these concerns.

Another concern for long term renters is the ability to leave due to lease agreements and the cost of moving is prohibitive.

These options leave one feeling as though this is not our permanent home but rather an unwelcome situation to what they thought was a long term solution to housing needs.

If the City wishes to allow the use of short term rentals, then leasees need to have the option to break their lease and furthermore, buildings should have a visible notice that they are allocated to that usage.

The public needs to be aware of such designations! I also recommend if a building becomes a STR designation, then the City needs to reverse that designation. I feel the current tenants should be polled to have their input into that status in a confidential manner. There are enough concerns regarding renting and we should not have more issues to deal with once we have signed a lease.

phyllis mccarron

I operate an AirBNB and am writing to express my support for the proposed STR regulations and to contest any suggestion that the existing STRs should be grandfathered in.

I began operating an AirBNB in 2016. It is in my principal residence. It was obviously a risky choice then, and remains obviously so. Risky investment choices are a privilege, and where they create public harm they need to be regulated. In this case, the public harm far outweighs the consequences for STR operators. People with the assets and time to fear whether or not we are maximizing the growth rate of our wealth do not suffer because you place a limit on our ability to run STRs. We have innumerable other investment opportunities to seize, and can allocate our capital accordingly. The consequences for STR operators are minimal, even if you choose to ban principal residence AirBNBs.

The public harm related to the housing crisis is substantial. For example, the housing crisis:

- Compromises the economic and cultural prosperity that arises out of housing affordability;

- Increases rates of substance abuse, domestic violence and mental health emergencies. I am a family lawyer and respite foster parent and hear directly from people that are affected by the housing crisis.

Notably, you are likely to not hear from all the students, artists, entrepreneurs, youth, etc. that have already left Charlottetown, and apparently the many that have not arrived due to the housing crisis. I hope that their voices will weigh heavily within your decision making process.

Best wishes to you all,

Randy Campbell

My name is Ryan MacRae and I am a resident of Ward 4 who currently lives in a former AirBnb on Upper Hillsborough Street. I am writing to you today to voice my support of Option 1 of the city's short term rental proposals (where STRs are only owner-occupied) and to stress the importance that those currently operating STRs not be exempt from these regulations by "grandfathering" them in.

Charlottetown faces a housing crisis and the STR market is clearly decreasing the housing stock since many of these operators are not building new homes but instead renovating old homes which used to house residents of Charlottetown. The COVID pandemic created the financial incentive for STR operators to rent long term, this is how I came to live in my current apartment, but I fear that now things are starting to reopen, these units may become STRs yet again.

I don't need to provide the city with more facts, Mr. Zilke has already put forward a fantastic report providing sound statistics and recent data. Please use his report in making your decisions, rather than listening to false numbers from lobbyists who have financial incentives behind their numbers.

It is time that the city stand up for its residents and their collective right to housing rather than supporting Charlottetown's wealthiest earning more. This is only the first time in fixing Charlottetown's housing market, but a necessary one. We would like to see the city work with the province and the federal government to secure more money for public housing and housing cooperatives.

Thank you for your time. I trust you will make the right decision for our city.

Ryan MacRae

My name is Samara Hartling and I am a resident of Parkdale-Sherwood. I'm writing this morning in support of the proposed Short Term Rental (STR) regulations that was put forth by Mr. Zilke and believe that city council should reject grandfathering in existing STRs (many of which are operating illegally under the current bylaw).

I believe by accepting Mr. Zilke's proposal for the regulation of STRs, the City of Charlottetown will be able to focus on fixing the current housing crisis that we are facing. By doing nothing and allowing STR owners to profiter off of the backs of our most vulnerable, the City of Charlottetown will have failed many of its constituents.

Best regards,

Samara Hartling

My partner Tristan Gray and I sold our home in Ward 4 last fall, and were lucky enough to find a home in lovely ward 5. Although we had planned to stay in the downtown core, after looking for two years, the inventory was just not there and we had to leave. We love our new neighborhood, and feel very lucky to be homeowners in a city with very low vacancy rates, and increasing cost of rent.

As you can guess, I am writing to you to discuss the need for regulation of short-term rentals in Charlottetown, and I believe in options 1 & 2. Commercial operations are the obvious culprit in this scenario, which has led to a number of issues that currently exist in our city.

I hope you will take this matter seriously, as it does impact everyone who lives in Charlottetown. One thing that really stood out to me during the public meeting this week was the psychiatric nurse who spoke about how housing issues have affected the ability to discharge folks, and has led to a decrease in the number of available beds for incoming patients. Precarious housing is such a strain on mental health to begin with, but now we are having a two-fold effect on the system because of this crisis.

Thank you for your time and consideration. We haven't had a chance to meet you yet, but look forward to connecting with you sometime soon.

Best,

Sarah Dennis

Good morning Alanna,

I'm writing in support of a motion that's going to council this week which I understand sets the limit on Air B And B properties to those that the owner resides in for part of the year.

I share concerns about the impact on housing posed by the number of rental properties that sit empty for most of the year and are only rented during the tourist season... putting pressure on both availability and cost of rental property in Charlottetown.

Sheila Bacon

I attended Tuesday's public hearing on the proposed STR bylaw and would like to provide some comments in relation.

First, I'd like to commend Mr. Zilke for his role throughout all of this and to express my sympathy for enduring that sort of harassment on Tuesday evening. He's been a consummate professional throughout this entire process and while some may disagree about the expertise or recommendations the planning department can bring on a given file that's absolutely zero excuse for the behaviour we all had to witness. From one human to another, I'm sorry you had to sit through that.

I'd also like to point out, though planning and council likely already know well, what everyday residents of this city who spoke in favour of regulation have been up against. A representative from AirBnB, who was almost certainly on the clock and being paid, spoke on behalf of STR owners at the meeting via WebEx. Private meetings and communication were held between STR owners and AirBnB throughout this lengthy process. Employees from a massive multi-billion-dollar STR corporation helped coach local STR owners in how to approach these public hearings, provided talking points and otherwise aided their attempts to sway the city against regulation. That stands in contrast to the many everyday people from all walks of life who turned up and spoke, as an overwhelming majority, in an attempt to address the harms commercial STR operations have had on our community. None of them had access to corporate resources and no one was on the clock being paid to coach each speaker or speak at the hearing. They came together from a sense of need and community.

While some of the STR owners (I'm thinking of two in particular) wrote to the city about the dangers of hosting the hearing during the "4th wave of COVID," publicly berated city planning staff about alleged bias, and argued that any regulation would harm their finances, they also called in from Italy while on vacation. For those speaking to concerns of house/homelessness, in part due to the proliferation of commercial STR operations in the city, I imagine a trip to Italy sounds rather lovely. Who wouldn't want the finances to travel the world? But it again demonstrates the stark contrast in resources between those simply looking out for their neighbours and those seeking to earn lavish vacations as they profit off of them.

I don't bring this up to directly dismiss anyone's opinion. Thankfully all respectful concerns and comments are welcome at these hearings. Rather, just as planning staff and council don't determine where a crosswalk is placed solely based on only strict planning metrics but also the concerns and communicated needs of the community, so too it's important to recognize where the concerns and needs of the community are on this issue. Those with the great luck and finances to own multiple properties aren't operating on the same playing field as those facing housing concerns are. That has to factor into decision-making. Council would do well to remember this when they ultimately vote on the issue.

To planning staff, I would like to address a few things specific to the proposal.

As it stands many (if not most) STR operations are already not adhering to provincial regulation. That means that enforcement of any regulations will be where any proposal lives or dies. While Summary Offense Ticketing is necessary, it must be backed by a robust system that regularly tracks STR operations. Not on an annual basis but ideally quarterly or monthly. If it's possible for an operator to set up a STR for a month or two and then slip away, any regulation will never ultimately be successful. If the city recognizes that STRs are contributing to the ongoing housing crisis and is acting on the basis they have an obligation to do their part, that means any success towards that goal hinges on ensuring that unregulated operations are shut down in a short and timely manner.

It also means that the grandfathering of existing operations, especially but not limited to ones already skirting regulation, is a clear and obvious mistake. It doesn't make sense to allow existing operations to continue on grandfathered grounds. If the purpose of any future bylaw is to address an unregulated STR market and alleviate its harms on the housing stock, grandfathering is entirely antithetical to that. All STRs should be operating on the same common basis and under the same regulations. No favouritism for those who have already shown they're willing to slip by regulation.

I think we're at a point on the issue where the planning department has done a lot of excellent due diligence on the issue. The academic expertise brought in and the internal dedication to understanding and developing the proposed regulations means this isn't an issue of "if" but of "how" at this point. To that extent, my only hope is that council continues to listen to the overwhelming outcry from the community on this issue as well as their own planning department recommendations. Council can and does often differ from staff recommendations on any given item before them but this seems an issue that has a clear direction. It seems to be a matter of addressing the housing crisis, addressing unregulated commercial STR operations within municipal bounds, and listening to the mass voice of so many who have spoken out for strict regulation vs succumbing to the bullying of a small handful of reasonably well-to-do STR operators.

The evidence is quite clear, it's been before you for some time and the majority of residents want strict regulation. Many will be watching to see how council votes, myself among them. As was discussed on Tuesday, let's not make this an election issue.

Thanks for your time,

Stewart Rogers

My name is Emma Drake and I am a resident of Ward 1. I am writing to you today to express my endorsement of scenarios one and two in relation to the regulation of short-term rentals.

As a former President & CEO of the UPEI Student Union, I have been researching and

advocating for the regulation of short-term rentals since 2018, with specific reference to their negative impacts on students. My colleague Sweta Daboo and I had the honour of presenting to the City Council on behalf of the UPEISU regarding short-term rentals in January 2020. While I am no longer with the UPEI Student Union, as a recent grad and public policy enthusiast, I continue my support for the regulation of short-term rentals.

To begin, Dr. David Wachsmuth's research identified that short-term rentals, "took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the Summertime which is an 8.9% increase in loss from the previous year." His research also showed that the "growth of STR's has contributed to an increase in rental costs of approximately 37.7% in 2017." This makes "STRs responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter." **While short-term rentals are one piece of the puzzle, make no mistake, without regulation and enforcement, short-term rentals have created a unique impact on the housing crisis in Charlottetown.**

As an attendee of the May 17th consultation on short-term rentals at the Confederation Centre of the Arts, I was disgusted, but not surprised when listening to the negative lived experience of many low-income, Black, Indigenous, and People of Colour, and or folks with disabilities as homeowners and renters in the Charlottetown market, due to the pervasion of short-term rentals. For example, one resident stated being displaced throughout the months of May to September and paying a premium of \$2700/month from October to April. Looking at short-term rentals through an equity, diversity, and inclusion lens, it is clear that strong regulation in the form of scenarios one or two is needed.

Scenario one and two are the strongest policy options to provide unique tourist accommodations, and economic opportunities for hosts while balancing the need to preserve our historic neighbourhoods and make Charlottetown an accessible option for residents, guests, and anyone who wants to enjoy our beautiful City.

Best regards, Emma Drake

Dear Planning & Heritage Department, Mayor Brown and Councillor Ramsay,

I hope you are taking good care as we begin to experience some warmer weather on PEI.

I write to you today to provide feedback regarding the Planning & Heritage Department Public Meeting on the topic of STRs within the City of Charlottetown that took place at the Confederation Centre on May 17, 2021.

CBC Reporter Nicola MacLeod's follow-up with Councillor Duffy about this meeting the

following day was disappointing. To learn that this public meeting is not being considered part of the “official path” to creating a bylaw to regulate STRs demonstrates a blatant disrespect of the time, energy, health and safety for members of the public who attended. As outlined under your “City Meetings 101” online page, public meetings of council are:

“..held to formally consult the public. These are typically related to Planning and Heritage items [...] Public Meetings of Council are the formal platform that provides an opportunity for the public to speak and give feedback to Council.”

It is peculiar that a large in-person public meeting would be held – in the midst of the ongoing COVID-19 pandemic – only for attending guests to learn after the fact that their input was merely “more of a warmup”, contradicting the very purpose of public meetings. This should be rectified promptly by:

- 1) Issuing a public statement to notify City of Charlottetown residents and attendees that all input/feedback on the evening of May 17, 2021 will be incorporated into the “official path” as the City moves forward with its next steps in creating a STR bylaw.

Furthermore, I would like to address the collection of personal information during this meeting. I do not see the necessity of having members of the public disclose their first and last name, along with their address/street name in order to speak at a public meeting. This is particularly sensitive information, especially when many speakers and attendees were young, racialized, disabled, queer, gender-diverse, low-income and renters.

I must emphasize how frightening it is – and how much courage it takes – for the above demographics to show up to these public meetings, especially when the topic at hand pertains to their past, current and/or prospective housing situations(s). Sharing their personal information publicly and on record without disclosing *why* and *how* this information will be used by the City is irresponsible at best, and at worst could result in negligent misuse of their personal information.

Considering the unique and often precarious situations that many renters and housing insecure persons are in, I suggest the following protocols for STR meetings and consultations going forward:

- 1) **Engage with renters** – particularly low-income and racialized renters – in the City regarding their lived experiences. Doing so will provide insight and direction on how to ensure their privacy and safety is upheld.
- 2) If the collection of personal information is necessary, be transparent as to **why, how the information will be collected and how it will be used before a meeting** (ex. in a news release and a reminder at the beginning of a meeting).
- 3) One alternative to having speakers state their first and last name along with their address/street name: **have speakers disclose only their first name and the Ward**

in which they reside.

Finally, I would like to formally express my support for Scenario 1 or Scenario 2, as outlined in the presentation delivered at the public meeting. The data that we have thus far clearly demonstrates the impact that STRs have had on our private rental housing stock.

I acknowledge the multi-faceted nature of both our general and affordable housing shortage. However, it is unacceptable to infer that the “STR issue” and the “housing issue” are separate and distinct problems. The information that we have at our disposal tells us this is factually incorrect. I do not anticipate that adopting STR restrictions will solve the housing shortage, but appropriate restrictions will provide some much needed relief.

Best regards, Brittany Cormier

Hi Alanna,

I understand there is a meeting about STR. Of course we support a regulatory framework that will protect availability of rentals across Charlottetown. We have some very serious shortages for low income options and I believe in an inclusive society is a healthier one. Of course provincial government needs to support building of more units. I have always thought developers agreeing to a 10% creation of low rent units in new builds is one way to weave low income tenants into new builds rather than creating large low income blocks. Large blocks create clusters of poverty and accompanying social issues that are counter productive to supporting families into moving forward. Sorry I have digressed into another issue.

Back to SRT, we need to meet expectations of tourists to support much of our economy but also recognize that if accommodation is too expensive workers in the hospitality area will not be able to sustain a livelihood. The ultimate example of this is Manhattan where many restaurants and bars have folded due to a employee crisis. Experience and common sense shows us workers will not make long commutes for low wage jobs. The acceptance of those low wage jobs involves the trade off of living in a dynamic and stimulating city. We also have to account for the reality that with higher home prices and rising mortgage rates supplementing mortgage payments with SRT is a reality for many home owners.

So I hope that percentages of Tourist Homes, STR and suites will be regulated against the number of available units.

Thank you,

Susana Rutherford(she/her)

I am writing this letter in support of scenarios one and two pertaining to Short-Term Rental Regulations in Charlottetown. From the evidence presented thus far, and well as the lived experiences of a number of residents of Charlottetown, these are undoubtedly the only two

options having a sustainable positive impact on our city.

I have previously held the position of Vice President Academic and External with the UPEI Student Union, representing five thousand students, most of whom reside in the Greater Charlottetown area. Of these students, the vast majority are renters and thus directly negatively impacted by the housing shortage in the City. I had the opportunity, in fact, to present to the City Council with regards to this issue in January 2020 alongside my colleague Emma Drake. At that point in time, the housing situation in Charlottetown was dire, with spiking rent prices, increases in renovations and an inability to find 12-month leases as opposed to 8-month leases.

Indeed, students do not, as is falsely claimed by a number of individuals, seek 8 month leases. As the City's data collection shows, short-term rentals see an exponential increase in summer months between June to August- or the four months of the year, where students supposedly do not need housing. On the contrary, over 50% of students at UPEI were enrolled in summer classes in 2018 and 2019, which required them to be on PEI during the summer months. Of the remaining 50%, at least 30 to 40% of students were employed in the Greater Charlottetown area, and therefore preferred to live in our City. Thence, the claim made by several seemingly benevolent landlords who claim students only look for 8-month accommodations is not only misleading but actively harmful.

Students are however not the only casualties of the housing market, the direness and competitiveness of which is significantly directly due to short term rentals on the market, as has been shown time and time again by research commissioned by the city, be it conducted by the planning committee, or by Dr. David Wachsmuth from McGill University. What is truly appalling about the current context is the obstinacy of the City to treat all opinions as equal, despite one side being motivated by personal profit and the other by a need for survival. Be it in interviews, the May 17th "information meeting" at the Confederation Centre of the Arts or other sources, the language of "hearing all sides and opinions" has been utilised generously. Let us be clear: the side pushing for stricter regulations as stipulated by Scenarios 1 and 2 is backed by research, studies, and lived experience while the other is a small vocal minority looking to profit off an already unstable market.

If expressing the wide-reaching detrimental social impacts of the abundance of short-term rentals is insufficient to sway the mind of the Planning Committee, I will now expand on the economic impact these accommodations have on Downtown Charlottetown. We have all seen small businesses struggling or closing down during the past year of the pandemic, and this despite the relatively lax guidelines we have enjoyed here on PEI. This was initially reported to be due to government workers working remotely as opposed to the downtown core. To be

realistic, while remote work was certainly a factor, the impacts would not have been as catastrophic had there been actual residents in the area, especially when looking at Lot 500. Without tourists to populate the various long-term turned short-term rentals, Charlottetown was transformed into a ghost city,

Availability of non-hotel or inn short-term accommodations is not as important of a deciding factor for potential tourists as is the vibrancy of the location being visited itself. If short-term rentals have a hand to play in the vulnerability of our businesses, their long-term harm will certainly outweigh their benefits.

I will also take this opportunity to express my deep disappointment with the regulation development process thus far. One public consultation in June 2019 is insufficient. The fact that no further consultations were held with the general public between February 2020, when Dr. Wachsmuth first presented the five possible scenarios to City Council and the vote to go with Scenario 4 at the level of the City is deeply concerning. It is an affront to the democratic process to unilaterally adopt a particular scenario with wide-reaching consequences without allowing the people a voice. The sheer opacity of meetings, be it through in-camera discussions, or the fact that the May 17th “public consultation” was revealed to be a “warm up” is a farce and an insult to the residents of Charlottetown who look to the City Council to make sound decisions on their behalf.

Scenarios 1 and 2 are by far the best public policy solutions to a rampant issue of homelessness, housing shortage and unaffordability on PEI, which is why I would strongly recommend these.

Best wishes in your efforts to develop and implement regulations
Sweta Daboo

I fully support the proposed STR regulatory framework as outlined in the document entitled: *City of Charlottetown Official Plan and Zoning Development By-Law Short-Term Rental (STR) Amendments* (File: plan-2021-04-october) published on October 4, 2021.

As my representative, **I ask you to please vote YES for these regulations.**

I am a tenant of Terrie Williams. I live on one side of a duplex she owns on Greenfield Ave. The only reason I was ever able to become a long-term tenant in one of Terrie's properties is because of the pandemic. In May 2020, Terrie put this duplex on the long-term market since she would no longer be able to gain income from Airbnb. My two roommates and I were thrilled to find such a great spot, since it has been so difficult to find appropriate housing over the last number of years.

Since we moved here in June 2020, we have grown to love this community more and more. We have become friends with our neighbours and rejoice in the times we share our meals, our baking, and can collectively participate in holiday activities such as Halloween trick-or-treating and New Year's celebrations. We love helping to make our street look cheery and bright over the holidays by decorating our door and front steps. Our neighbours often remark how happy they are to see this unit occupied long-term - it gives them great comfort to know and trust the people who share backyard space with their young children after so many years of watching strangers parade in and out of this unit every weekend.

Although it is unfortunate the pandemic has been so long-lasting, we are so grateful that it has allowed us to stay here. However, my roommates and I are dreading this upcoming summer because we know we are going to be asked to leave our home so that Terrie can make more money off Airbnb tourists. We have really made this place our home over the last year and a half and will be so sad to say goodbye to our neighbourhood. Furthermore, given the current housing situation, we all fear that we won't be able to find a suitable housing alternative.

While I have seen Terrie Williams and David Toombs attempt to persuade Council that their Airbnb's contribute to Charlottetown's economy, the negative impact of their short term rentals on the *community* cannot be overstated. Research has shown that tourists do not make their decisions on whether to visit a city based on the availability of Airbnb's. The tourists will still come. The long-term residents on the other hand, may have no choice but to leave Charlottetown to live elsewhere with more affordable and available housing.

I and many of my young friends want to make our lives here. We love this city and this province and we want to stay here, but many of us are afraid that we will have to go elsewhere if the price of living continues to outgrow our wages. Regulating short term rentals can help mitigate the current housing crisis.

I am asking you to consider where your values lie - will you vote for already-wealthy Charlottetownians to make more profit, or will you vote for more vulnerable Charlottetownians to grow and prosper here and contribute to the future and vitality of their community?

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Taya Nabuurs

My name is Tristan Gray and I live in Ward 5.

I'd like to put my households support behind Option 1 for the proposed STR regulation. Living both up and down town I've seen the damage that airbnb operators have done to the city and how they've affected the housing and rental market.

I hope that The Planning Department puts the people of Charlottetown ahead of a profits

Thank you, I hope you have a great weekend, & get to enjoy the sunshine today!

My name is Tegan Hermanson and I live in Charlottetown on Prince Street.

I fully support the proposed STR regulatory framework as outlined in the document entitled: Short-Term Rental Zoning & Development By-law Amendments (File: plan-2021-04-october) published on October 4, 2021.

As my representative, I ask you to please vote YES for these regulations.

As a young person new to the community, I see that Charlottetown has the potential to be a wonderful place for young folks to settle into, to find work, buy houses, etc. I also know that none of this is possible if housing is not fairly priced and accessible. Housing is more expensive here than in large city centres across the country; Charlottetown cannot compete with centres that have both better paying (more varied) jobs and cheaper housing, and will see consequences should this not be ameliorated. Beyond this, unaffordable housing disproportionately disadvantages low income families/individuals; this is simply not inclusive and caters to the white middle/upper class.

Inclusivity is a must and affordable housing is a right full stop.

Thank you for your work on the issue of housing for Charlottetown residents.

Sincerely,

Tegan Hermanson

Renting PEI

Re: Proposed Short-term Rentals By-law Amendments

I am writing to share feedback on behalf of Renting PEI. Renting PEI is a project of Community Legal Information. Renting PEI shares plain language legal information with tenants and landlords about their rights and responsibilities. Renting PEI staff regularly support tenants who are

affected by the lack of affordable housing both in Charlottetown and other parts of the island. Renting PEI fully supports the proposed by-law amendments to regulate short-term rentals in Charlottetown.

Since April 1st, 2021, Renting PEI has served 416 clients. We speak to tenants almost every day that are facing evictions and have no place to go. I have spoken to three tenants in the last month who were evicted due to no fault of their own and are now homeless. The lack of affordable housing is undermining housing security on PEI.

We appreciate the City of Charlottetown taking the time to put forward a well-researched set of amendments, drawing on the best data available. We hope the City will take care in weighing the housing needs of Charlottetown residents against the financial interests of a small group.

There is a housing supply issue on PEI and it's affecting how our laws work. When a landlord on PEI breaks a condition of their lease agreement, often the only option available to the tenant is to apply to the Rental Office for an order terminating their lease. This is useless unless there is an adequate supply of housing. Most tenants don't have many options for alternate housing.

Home-sharing platforms, like Airbnb, are a new industry and new industries need new regulations. Some members of our community have over-invested in an unregulated industry. Heavy investment in an unregulated industry is a clear risk, and many have made money on that gamble. While these people may face financial losses due to the introduction of new regulations, that does not mean the City should stop at anything less than reasonable and functional regulations.

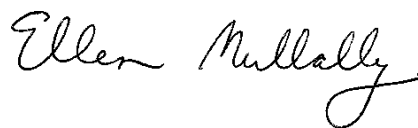
We have a big question to answer: "What is a house for?" When I think of a house I think of a home, not an investment or a business. When I see an Airbnb, I see a community member priced out of the town they grew up in, I see a place where the next generation could be growing. Instead, we have empty houses and transient visitors. If we don't sufficiently regulate this sector, we are trading parts of our community to turn a profit for a few.

Thank you for taking the time to consider this feedback.

Sincerely,



Morgan Sandiford Legal Navigator Renting PEI
Community Legal Information



Ellen Mullally Executive Director

End of comments

Public Feedback – Oppose Regulations

Good Afternoon,

We are writing to say that we do not want the short term rental bylaw to pass. We feel Airbnb and short term rentals are great for tourism which in turn helps PEI's economy.

Thank you for your consideration,

Ashley and Kristian Macdonald

Good morning Mayor Brown and all those that are on this email. As you are aware I've been trying to "follow the rules" and secure a Provincial Tourism License for a property I manage for my Son in Law on 52 Sydney street.

I have been back and forth on this to both the province, Mayor Brown and Councillor Jankov. I've left messages for Mr Forbes and to date he has not responded.

As the City Planning Department is well aware this building was approved by the City with the clear intention of selling 2 of the units and their Corporate Company retaining two of the units for Short Term rental. All required permits, approvals etc were obtained as required. The Condo bylaws confirm that STR's are allowed as well.

The Province has clearly stated that they are now required by Provincial Statute a letter of approval from the City of Charlottetown confirming that the Province can go ahead and issue the appropriate Tourism License in order to ensure the "rules" are followed. This is what we are attempting to do.

Both the City Mayor and Councillor Jenkov have confirmed as of today the City does not have an active policy on the regulation of STR's. They are working on creating one which we have been actively involved with by attending the 3 public meetings the City has hosted. It is our understanding that over the past number of years the City has not secured any new applications for registration of such properties. The Province has confirmed that City Staffer Robert Zilke had responded to this initial request. My understanding from City Council members is that Mr Zilke's response was not within his jurisdiction and as such I request that the City planning department provide the Province of PEI Tourism Department with the proper approval so we can "follow the rules" as they presently stand.

If there is "paperwork" required from the City's end, please send it along so we can complete the application on our end.

Bruce Donaldson

My name is Demi Theriault and I'm a 4th year UPEI Nursing student. I've been living in a Short-Term Rental for the last 3 years during the school year (from Sept 1 until April 30). This arrangement was perfect for myself as I move home to New Brunswick every summer. Without short term rentals being available to me as an option, I would be forced to pay rent or find someone to sublet my space during the summer months. The Airbnb I stay in is licensed through the Province of PEI. I

know this because the plaque with the license number is displayed inside the door of the property. I'm writing today to ask for the planning board to consider grandfathering all existing licensed short-term rentals into any new bylaw that is developed. Thank you for your consideration.

Demi Theriault

Though I was not able to attend the November 9th public forum in person, I was able to watch the stream on YouTube and I wanted to first off say thanks to everyone who has, and continues to, participate in the housing discussions, which is such an important topic for our community. I also want to recognize the courage and conviction of everyone who spoke during the forum. Its great to see so many people passionate about the housing crisis in general, and on the issue of STR in Charlottetown specifically.

I have some thoughts about the issue of STR, but I want to start by saying that I'm neither a renter of my home nor an owner of a STR property. I am a concerned citizen that wishes to provide some insight and perspective from a neutral party.

I understand the concerns from renters regarding the increasing cost of rents, the dwindling inventory of available rental options and the uncertainty that can exist when you rent a home. That's a real problem that should not go unheard nor is it an issue that should go unaddressed. I caution though, that it is not a problem that should fall to the feet entrepreneurs/small business owners who are fellow citizens attempting to create a business and contribute to the local economy. This is a problem that should be solved by our governments. Not through more regulation and further handcuffing small business, but by providing low-income housing options.

PEI is already regarded as the most regulated province in Canada when it comes to landlords and housing. The regulations and requirements in PEI are so restrictive for landlords that it does not incentivize anyone to become a landlord to provide housing options for residents. One way the government can help incentivize more long-term rentals (LTR) over STRs is to remove the restriction on rent increases to market rents when there is tenant turnover or allow landlords to increase rent in line with inflation (which is currently at 4-5% compared to the current 1-2% allowable rent increases).

Landlords in PEI will eventually get squeezed out of profitability and thus will no longer offer housing options to the market. This will further reduce the available rental housing supply in the market, which in turn drives up costs. The opposite of the intended effect but the result, nonetheless. Over regulation is counterproductive to keeping costs affordable.

Small business owners are the backbone of our economy; they create jobs and provide housing. If the governments continue down this path of over regulation it will drive landlords and small business owners out of the province. They will take their resources to other areas like Moncton where it is easier to do business and make a living, The jobs they create and the homes they provide go with them.

I am relatively new to PEI, though originally from Atlantic Canada (NS). I have lived in many different parts of Canada (NL, NS, PE, ON, AB, BC). PEI is by far the most regulated and difficult place to operate a small business in real estate. This is a problem. Here's why. 90% of millionaires become so through real estate. The more high net worth individuals you have living here, the

more they create more high net worth individuals, through job creation, mentoring, taxes, reinvesting in the local economy, providing housing of all types. We should want more of these people here; not fewer. They have more resources to give back to their communities. People are paid based on the size of the problems they solve. We should be encouraging problem solvers to remain in PEI; not driving them away with over regulation.

STR are a very small portion of the properties available in Charlottetown, and they are an important factor for tourism. Many tourists who visit our beautiful city want to rent a home for a week or a month where they have amenities similar to what they have at home. I caution us to not lose sight of the

importance of tourism to this island. If we don't have enough accommodations for tourists, eventually tourism starts to dry up, and the impacts of that would be devastating.

Also, due to the covid-19 pandemic, the borders to PEI remain closed to visitors for the better part of year and a half. This forced many STR owners to convert their STR to LTR. So, most of the STR stock converted to LTR for the better part of 1.5 years, yet we saw no material change to the housing crisis. STR is not the cause of the issue and regulating them will not solve the issue.

When we hear city officials stating something to effect of – *One property owner shouldn't have multiple residences*, it is very concerning. If we start to go down the path where the government gets to determine who gets to own property or how much and what they have to do with it, we are staring down the barrel of communism. I promise you this is not the society we want to encourage or to which we want to strive.

I want to finish by again acknowledging there is a very real housing problem that requires solutions. This housing crisis is not going away without some real solutions. I urge you to consider the knock-on effects a decision like this can have. Instead of handcuffing your small business owners, look at real solutions like providing low-income housing, and ensuring that Islanders are earning a living wage. You have ambitions to increase immigration in Charlottetown, which I applaud, but for that to be a success, we need to ensure the infrastructure is in place to support the increased population that has and will continue to result. The housing crisis on PEI is the worst in Canada, and PEI is also the most heavily regulated when it comes to housing. This is not a coincidence. Over regulation will not solve the issue. I urge you to not only reconsider adopting this STR regulation but also work with, or at least encourage, the province to review and amend the regulations on LTR as well, as those are directly contributing to the housing crisis.

Thank-you for the opportunity to provide my thoughts.

Craig Bennett

My name is David Toombs and I'm a long-time resident of Charlottetown. I'm a business owner and a Commercial STR property owner. I resent being called a "commercial STR Owner" as if it's a bad thing. In my day, when you worked hard, achieved success, employed people, followed the rules and invested wisely, you would be referred to as an entrepreneur and that's what I am. I am one of the small group of commercial STR owners in Charlottetown that have invested heavily and painstakingly transformed most of the 500 lot area from slums and drug houses to beautiful livable spaces.

I say slums and drug houses because I know first-hand. I purchased an unoccupied property a few years ago. People had been living in it 6 months earlier. I guess to some it would be considered "affordable" housing and perhaps that's what some of you here tonight are fighting for... but I

don't think you would be fighting for this property. It had no clean water, the appliances were rusted out and non-functioning, and it was infested with rodents. Not fit to live in.

I don't understand Mr. Zilke's public comments to CBC that commercialization of STRs has contributed heavily to the decrease in vacancy rate and the rise in property values in Charlottetown. No mention here of the thousands of immigrants and migrants relocating to Charlottetown every year and the lack of new builds in the last 20 years by all levels of Government. I would suggest he's comments are very biased and ill-informed and portray Commercial STR owners like me as the "bad guy". Like it or not Charlottetown is a very desirable place to live and still very affordable on the world market. I suggest prices will only get higher as time goes on and the world gets smaller. Regulating STR's will have zero impact on housing prices or vacancy rates. Just look at what happened in Toronto after restrictive STR regulations got put in place – rents and housing prices are still climbing. Zero Impact. Since 2013, the City has witnessed the transformation of the 500 Lot from slums to beautiful homes. Knowing full well the only way anyone could restore these properties is by renting them short term. Now the planning department wants to change the rules and pull the rug out from under us all. This is not a fair or reasonable solution in my opinion. Since the new provincial legislation passed early November, stating all STR's must publish their tourism license on their listing, we should be able to calculate how many actual licensed STR units are in the City. We do know from Tourism, there are 83 tourism licenses issued for 2021. Imposing any regulations before this accurate data is collected is simply irresponsible. Charlottetown is NOT Toronto or Vancouver or even Halifax. Tourism is our #2 industry and STR's provide millions of dollars in revenue to the City and Province.

If the highly restrictive proposed regulations are implemented, I can tell you that my STR units are NOT going to be \$971/month affordable rental units, or even be returned to the long-term rental market. Quite frankly, I have too much invested into the properties, and it doesn't make fiscal sense to do anything other than short term or 30-day rentals. Not everyone wants long term accommodations. There is a market to rent to students, cottagers and new immigrants who need a place to stay before they get settled. The only thing that will be achieved by banning commercial STR's is eliminating alternate high-end accommodations in Charlottetown. Very short sighted in my opinion.

I can speak from my own personal experience as my business takes me around the world. Whenever possible, I stay in self-contained Airbnb's during my travels. And right now, I can tell you that the Charlottetown STR market offers nothing short of world class accommodations. To destroy this and achieve nothing will be a complete shame. To revert to "Tourist Homes" as the planning board is recommending is putting Charlottetown back in time 40 years. What next? Banning Amazon and going back to Sears catalogue. It's too ridiculous to consider. I'm hoping the Councilors have some common sense and want to keep Charlottetown in this Century.

In closing, I support:

1. grandfathering all STRs that are currently licensed under the Provincial Tourism Act
2. collecting business/tourism/hotel taxes
3. striking a working committee with all stakeholders to help develop this new bylaw

Thank you for your time.

David Toombs

My name is Ellen MacDonald. My husband and I are homeowners and operate an STR in downtown Charlottetown.

We purchased 165-167 King Street in 2017. It was completely run down and needed hundreds of thousands of dollars in renovations to restore. It was a complete eye sore, and when the property became available to purchase, we did everything we could to come up with the money to buy and renovate the very much rundown building. Living next door to this property for years while it was in such bad shape and poorly taken care of was frustrating to say the least.

After we purchased this building we applied for the applicable building permits and followed heritage guidelines and recommendations, as well as having meetings with the heritage board to ensure we were within their criteria. All the while we spoke very freely to our city councilor and the Mayor that we had all intentions of using this property as a STR for vacationers to PEI. It was always intended that when the renovation was complete, we would operate as a STR to help recoup the excessive costs of doing such an elaborate renovation that entailed keeping the buildings original charm and historical character. In saying this we were encouraged by many city councilors and the Mayor to operate as a STR when the topic came up in conversations with them. As well we were commended by these same people on what an amazing job had been done and how much it cleaned up this part of King St.

Prior to advertising on Airbnb and VRBO, we did our research to ensure we were following all city bylaws, and found out all we needed to do was become licensed by Tourism PEI. We did this and have done so every year since operating as a STR. I very much take pride in running a five star STR and happily welcome Tourism PEI to come and inspect our property yearly.

After attending the last public meeting regarding this issue it feels as though we (STR operators) are bad people, and are taking houses away from the ongoing housing crisis in Charlottetown. When in reality we are very much contributing to the much needed tourism revenue for restaurants, shops, boutiques etc., also by upgrading our property much like other STR owners we are not only beautifying older neighborhoods, but it also increases the property tax base for the city. Another addition that STR's bring to Charlottetown is the need for short term housing for locum doctors and professionals coming to assist in our desperate health care system on PEI. We hosted a locum doctor some time ago, and they expressed how thankful and happy they were

to have has such quiet and private accommodations, close to the QEH and that suited their needs so perfectly.

Mr. Zilke's proposal to very much restrict the STR market in Charlottetown, and return the units to the long term rental market is just not practical and is very much a bad misconception. I agree that we have a housing crisis in Charlottetown that defiantly needs to be addressed, but to suggest the current restrictive staff recommendation on how the STR is contributing to the affordable housing crisis is just not correct. These restrictions would not resolve this issue, and would most likely financially ruin my family. As we have invested most of our life savings into this property in hopes of someday having this be our retirement. Most of these STR properties with extensive renovations are just not in the demographic of those needing housing, our properties are not and will never be listed as affordable housing.

In conclusion, I completely disagree with the purposed restrictions of STR's in Charlottetown, or that we have contributed to the housing crisis in Charlottetown. That is by far a much bigger issue that needs to be addressed by all three levels of government, Federal, Provincial and Municipal.

As a property owner and STR operator, **my recommendation is that all existing Tourism license holders be grandfathered, and continue to operate our STR's as we have been all along. Also, STR's need to be registered and licensed with Tourism PEI and to submit occupancy reports to the province monthly.**

Thank you for your time and the consideration of my suggestion

Ellen MacDonald and Tim Driscoll

Thank you for taking my submission in regards to the Short Term Rental (STR) issue. My name is Eugene Sauve, I am a long-time resident of Charlottetown, a former restaurant owner in Victoria, PEI and a former STR operator in the city. I know first hand how hard and demanding the Tourism and Service Industries are. This Industry is not for everyone - the risks for operators are great, they invest a lot of time, money and long hours into their businesses. Reviews can make or break your business, especially in the STR World. If you are doing it right, you are giving 100% and you are on-call 24/7. You have a lot on the line. It takes substantial capital to set up a STR - renovations, high cost of furnishings, licenses and fees. You cannot just return it to the long-term rental market without taking a major financial loss. It's not considered an affordable housing option.

I think it is a mistake that the Planning Department is considering shutting down hard working commercial operators in the City. These operators have restored many rundown houses all over the City; they have invested Millions of dollars hiring contractors, plumbers, electricians, painters and architects, just to name a few.

You want to shut them down when really you should be thanking them for beautifying, energizing and revitalizing our beautiful City. Times are changing on the Tourism landscape - travellers don't want to stay in a tourist home with the owner present, especially during COVID-19. So let's keep

Prince Edward Island on the destination map! Everyone has a right to affordable housing but affordable housing is the responsibility of Municipal, Provincial and Federal governments. It should not be put on the backs of private property owners.

I am asking Council to Grandfather existing Provincially Licensed Properties, it is the only fair and reasonable option.

Thank you.

Eugene Sauve

We write to you today in support of allowing existing short term rental property owners the ability to continue in their business activities and to continue in making their significant contributions to Charlottetown's tourism industry and economy. In addition to paying our annual property taxes, we have contributed substantially to the local economy by employing local professionals, tradesmen, contractors, service providers, suppliers and manufacturers as we have improved and maintained our property and welcomed many tourists, returning islanders who are currently living away and visiting professionals to the City of Charottetown, the Province of Prince Edward Island and the Maritimes in general since first purchasing our home in 2008. While we do enjoy the house for our own purposes and that of the enjoyment of our families from time to time, we also offer term and short-term furnished rentals throughout the year.

It is our hope that council will consider the proposed regulations in question with care and that the resulting regulatory framework will be one which further recognizes, supports and encourages the ongoing contributions of this most valuable economic activity.

Most sincerely,
James Ormston and Steven Fudge

I was at the meeting and spoke the other night although I was a little nervous ok A lot nervous. so I wanted to send an email of the content of my message. I am an indigenous woman from Mississauga first nation. I am asking for your consideration in the matter of short term rentals. I have been purchasing properties on PEI since 2013 I buy properties in which many are historic century homes I update and refurbish. This contributes to the revitalization of the downtown core.

In most of my housing locations I rent to you UPEI students for nine months. The students appreciate this as they do not have to pay rent in the summer months when they are not there. As an indigenous woman and small business owner I have overcome many obstacles. I have invested money time and sweat equity. I have been dedicated to supporting other local services and trades.

This is my passion and livelihood. If you decide to eliminate STR's you are handcuffing my rights and freedom as an indigenous business owner. I would like you to consider grandfathering our properties and allow us to continue to offer student housing in the remaining nine months.

Miigwech
Janeen LaForme

My name is Jayne Toombs and I live at 151 Queen Elizabeth Drive. My husband and I ran an Inn in Charlottetown for 20 years but sold it a number of years ago. I would just like to make a couple of points. The tourist market has changed in the last number of years and tourists are looking for high end accommodations. Families and couples are looking for more than a hotel room. Many are looking for more space and want kitchen and living rooms. Short term rentals are meeting this demand.

Existing STR owners of today saw an opportunity in this market a number of years ago and in good faith invested time and money to meet what the market was looking for. They invested at a time that the regulations were not being enforced by the city. My understanding is that these accommodations were licensed by the province and were inspected by the province under the tourism act.

As a former owner I know the cost involved in running a tourist accommodation in terms of time money and energy. I agree there needs to be rules and regulations for SRT but it is unfair to shut down current owners who invested their money, and time in good faith. The fair thing to do is to grandfather in the existing STR and move forward from this point.

I'm a resident of Charlottetown, an Airbnb host and a concerned citizen. This month, the City asked residents to weigh in on a series of short-term rental proposals. A few of the regulations being proposed would make it much harder to host and would unnecessarily restrict my ability to share my extra space. When guests stay with me they support our local economy and spend money at local restaurants and shops.

When the pandemic is behind us and travel comes back, we can play a big role in supporting our small businesses, restaurants and tourism attractions. This summer and fall, travelers from around the world will be eager to stay in our historic city and they will bring much needed revenue to our community. In addition, with so many people having the opportunity to work remotely, many may choose to rent their homes while they're away visiting family or working from another city. The city's proposal would make it much harder for residents like me to earn supplemental income. I'm urging you to protect responsible hosts like me who open up their space to travelers and are able to make ends meet by doing so.

Jeni Mutch

My name is Jillian Marchbank and I'm a 4th-year UPEI Nursing student. I've been living in a Short Term Rental for the last 3 years during the school year (from Sept 1 until April 30). This arrangement was perfect for me as I move home to Kensington every summer and live in Charlottetown throughout the school year. Without short-term rentals being available to me as an option, I would be forced to pay rent or find someone to sublet my space during the summer months. The Airbnb I stay in is licensed through the Province of PEI. I know this because the plaque with the license number is displayed inside the door of the property.

I'm writing today to ask for the planning board to consider grandfathering all existing licensed short-term rentals into any new bylaw that is developed.

Thank you for your consideration.

I come through this to express my concerns in regards to the new proposed by-law involving Short term rentals in our city. I am an immigrant that moved to Charlottetown to open a business 6 months ago. Unlike many others, I've got my permanent residence in Ontario and then decided to move to PEI. My wife and I are the founders of KY Home Solution, a company based in Stratford that helps immigrants, executives, and international students relocate to the island. We help them find a place to live when they first arrive while they are still in their countries. Many of my clients are new to Canada, they have no credit score nor references when they arrive. We offer them a turn key living solution while they look for a more affordable permanent accommodation. Our rentals are generally from 2 to 4 weeks.

In the past few months we have helped several families and individuals to start their life in PEI. We take great pride in the work we do, we feel grateful and fortunate to have had the chance to restart our life in this amazing country. Our mission is to help other people that are looking for a fresh start. These people most times are unfortunately ignored by locals due to the fact that they lack history in Canada and they don't speak the language.

This Business is the main source of income for our family, and it is a secondary source for the cleaners that we employ (usually international students that can only work part-time). If the by-law was to be approved the way the city is proposing it, it would be devastating for our family.

I therefore, urge you to vote against this proposal and to work with the STR operators to find a compromise that will mitigate the problem of house shortage without destroying local businesses like mine.

Juan

Carniel

I am writing to voice my objection to the proposed regulation for Short Term Rentals brought forth by the City of Charlottetown Planning Department. I reside at 17 Bardin Crescent in the City of Charlottetown. I believe this to be an over reach by department representatives as well as

having the appearance of a Vanity Project to satisfy a vocal minority whose objection to Short Term Rentals which is misguided and ambiguous at best.

The proposed regulations are an overreaching short term solution to the “housing crisis” which is currently being touted as the flash point for these proposed regulations. A high percentage of these properties will be too cost prohibitive to provide any real benefit to the rental market and the regulation proposed shoots wide of the target to provide any real contribution for additional units into the rental market. The returns investor/owners require in order to both finance and recover costs prohibits many of the proponents of the proposed regulations. City of Charlottetown residents who have invested their savings, sweat equity and in some cases their life savings cannot be expected to jeopardize their investment nor finance what is the Federal and Provincial governments responsibility for affordable housing. Lower rental/affordable housing costs are not achievable by overreaching regulation at the municipal government Level.

Personnel in this department should be aware that affordable housing is not funded by municipalities and opportunities for funding efforts should be promoted at the both the Provincial and Federal governments level. Regulating and hindering investment appears to be short sighted low hanging fruit which reeks of incompetence on the city’s behalf.

I would challenge the legitimacy of these regulation particularly after the City’s planning department issued permits and encouraged the development of these properties as part of the revitalization of many properties in the City. Efforts to designate new development areas as affordable housing and collaboration with Federal and Provincial government for funding would be a much improved utilization of the taxpayers dollar.

This strong arm regulation presented and promoted in the media by the City employee should be seen as an overreach and embarrassment to both the planning department and City taxpayer. It has in fact, absolutely offended many of the owner operators as well as many tax payers of the City of Charlottetown and has potential to cause future investors to look elsewhere. This message that STR owners simply “may sell or return their properties to the rental market” should never been presented to the media as the City’s stance and is offensive and I would insist that an apology or correction be presented to the same media outlets who originally interviewed and published the City of Charlottetown Employees comments.

Kirk Redmond

Please note the following concerns I have as an operator of STR located at 4 Richmond St...Let it be known that I have a deep concern for people in need of continuing long term rentals close to the city. The term, affordable rentals, used often, but needs a definition as what is considered affordable and to whom.

My other concern is limiting business. Entrepreneurs are the backbone of commerce and should this STR bill pass council, it will effectively put me out of business. This also means that the property manager will lose some of her business as well as the housekeeper..

I feel that this is placing the City of Charlottetown on the edge of a precipice saying Charlottetown is not open for business. Declining STRs today, what will happen tomorrow? There will be a loss of revenue to restaurants and bars, entertainment, merchandise sales and miscellaneous services. This could be caused by a diminishing of people not visiting Charlottetown who prefer independent accommodations, available elsewhere. There is no argument with regulation, inspection and comfort and security of patrons. I do not believe that limiting business in this area will solve the affordable housing crisis. Simply selling these properties will not help with this housing crisis. I feel there must be alternatives to this crisis, not on the backs of small entrepreneurs.

Respectively submitted

Larry and Beverley Dunville, Lawrenceville Investments (2017) Inc

I would like to first commend the City of Charlottetown Council for undertaking the review of regulations for rentals in the Charlottetown area. Secondly, I would like to emphasize, as short term rentals are an important part of the tourism industry here on PEI, I support the grandfathering STR's that are currently licensed with PEI Tourism, under the existing Act.

Thanks for hearing!

Marley McDonald-dow

I am writing to voice my opposition to the proposed municipal bylaw amendments with respect to short-term rentals in the City of Charlottetown.

My son-in-law and I own a 3 unit apartment building in the City, and I am a 25% shareholder in a corporation which owns 21 rental units in the City. While all of these rental units are currently rented as long term rentals, some have been rented on a short term basis from time to time.

I strongly disagree with the proposed restrictions to short-term rentals. I do not disagree that there is a shortage of what has been termed "affordable housing" in the City. However, I disagree that it is the role of the private property owner or entrepreneur to provide affordable or lower-income housing. Surely this is the role of government, as is the provision of any form of social assistance. The severe restriction of short-term rentals, as proposed, does not recognize the value of short-term rentals to the economy of Charlottetown and all of Prince Edward Island. Many short-term rentals in the downtown core of Charlottetown are located in buildings which have been purchased, renovated and upgraded, contributing to the revitalization of downtown Charlottetown and the resulting positive impact on the revenues and viability of all downtown businesses. Short-term rentals are a vital component of the tourism industry, and are the current trend in accommodations. They are necessary to sustain and grow the tourism sector, a major driver of the PEI economy. If not readily available in Charlottetown in the current manner,

potential visitors seeking this type of accommodation will simply choose to travel and stay elsewhere, adversely affecting revenues of Charlottetown restaurants, attractions and retail outlets. Further, restricting property owners from renting on a short-term basis will not address the issue of a shortage of affordable housing. Property owners who have invested significant funds in their properties are not going to rent them for rental amounts that will result in financial losses.

The short-term rental business is currently regulated by provincial tourism legislation which requires maintaining provincial standards for annual licensing. HST and income tax legislation apply to this sector the same as they do to any other business. Accordingly, this sector contributes to government revenues the same as any other sector. Yet municipal government does not get in the middle of the business of other industries by restricting how they operate with far-reaching and imposing regulations/bylaws such as those proposed for short-term rentals. The proponents of “affordable income housing” have had a sustained voice with respect to their issue. No one disagrees that there is a need for lower income housing. However, it is not the responsibility of property owners who, in good faith, invest significant dollars in the purchase, renovation and maintenance of valuable properties, to then rent those properties at a financial loss to solve the “affordable housing” issue. This is the role of government.

For the above-noted reasons, I respectfully request that the proposed bylaw amendments with respect to short-term rentals in the City of Charlottetown be abandoned.

Michael A. (Mike) Hennessey

My name is Mitchell Roggeveen, I am a resident of the City of Charlottetown. I am writing to you to voice my concerns about the upcoming decision on short term rentals (STR) within the city of Charlottetown. I recently purchased a property at 61 Dorchester Street, that was licensed and operating as a STR. I bought the building intending to continue operating it as such. Unfortunately, due to the COVID-19 I did not feel safe renting out my unit up until this point. I would like to obtain the license in my name for this property and be grandfathered in. This property has been renovated following the PEI Heritage codes and the city bylaws. Affordable housing is in a crisis, especially with the population of PEI increasing making it difficult to find rentals/buy. I do not believe getting rid of STR's is the proper solution to low income housing crises. To rent my residence out long term I would have to rent it out for \$3,000 a month and that is just covering my mortgage/expenses and minimal profit for unforeseen expenses. That is not low income housing.

When I attended the meeting held on November 9, 2021, there was a lot of shame and guilt portrayed to any and all STR owners. I do not understand where this hatred against STR began, it is very unfortunate that I am made to feel this way as the prideful owner of a Charlottetown property. I would also like to point out one of the main industries in PEI is tourism, where will all the tourists stay if STRs are unavailable in Charlottetown, especially the downtown core? I understand hotel accommodations are still available, but people love their own space for their

families or for themselves. STRs owners have invested their own money into renovating these run-down places into beautiful accommodations, that people love coming back to year after year including islanders for staycations. I will also add Charlottetown is looking aesthetically beautiful and pleasing. It wasn't the governments money put into making it like this it was the STR owners' money.

STRs have created multiple job opportunities for islanders as well, especially in the busier months from May-Septmeber. From hiring landscapers, buying local product for guests, employing cleaning companies and property managers. I hope you take into consideration there needs to be a much greater solution to the housing crisis than eliminating STRs, this witch hunt that's happening is not the answer.

Mitchell Roggeveen

Our names are Philip and Kelli Tweel, we are landlords, businesspeople and chose to live, do business and raise our family in the City of Charlottetown. We did the renovation and expansion to our store, Island Activewear, a few years ago. During the process, we decided to renovate the two apartments above the store as our tenants were moving to senior subsidized housing. We had to fund the renovation of the apartments personally and decided the STR would be a short-term plan to recoup some of our personal funds. We rent them out for STR from June thru September. Some of the people renting our units during the summer months are families attending Andrews Hockey School, UPEI Summer Vet Camp, Lokums, people building homes or renovating and people working short term in Charlottetown (Federal Government, IT sector etc.). For the most part, they need more than just a bedroom and washroom. This past year and half gave us the unique opportunity to rent to people needing to self-isolate for 2 weeks due to Covid-19. We also have others for shorter stays, couples or families for weekend getaways. We usually have students take the fully furnished units from Sep/Oct thru May. This enables us to offer them a fully furnished unit along with a more affordable rent as all the furnishings are there. After being in the STR business the past few years, we have learned many people love the fact they have a space other than one room. In some instances, they take their families, enjoy their privacy and maybe stay a few extra days to enjoy our city and province.

We are writing to you on the proposed regulations that are being considered for Short Term Rentals in Charlottetown. We feel the Short Term Rental Industry is being singled out as the singular reason for the lack of affordable housing in Charlottetown. We do not believe this to be true. There are other factors such as people moving to Prince Edward Island for work, to raise their families or retire. Not to mention the influx of new residents moving to PEI due to pandemic. As a result of the increased population, obtaining new apartments and housing is getting more difficult. Additionally, the inflated price of housing and demand due to these factors are a major contributor and are happening all over Canada not just Charlottetown. We do know for a fact, Souheila Tweel (Philip Tweel's mother) who has been a landlord with her deceased husband, Said Tweel for over 50 years, has several affordable units available and there is no one calling to rent, so they remain empty.

We do feel that some regulations are necessary. We believe that all STR's should be licensed and inspected. We registered our business with the Province of Prince Edward Island, we are inspected on a yearly basis, and we claim the income from it. We also believe a levy similar to that of the Hotel/Motel industry should be imposed. We are hoping that the existing licensed and inspected STR's should be grandfathered or allowed to continue. We use the same platforms as many of the B & B's, Tourist Homes, Inn's and Boutique Hotels. We also feel that STR's are a very important part of Tourism on PEI.

We also feel that any City of Charlottetown Employee, no matter what position they are in, should unbiased, not one sided and not be an advocate for organizations that are in conflict of what they are presenting to council as well as the public. Our belief is that they are to represent the citizens and tax payers of Charlottetown fairly and should act in an ethical manner. If they are unable to perform their job in an unbiased fashion, then they should recuse themselves from the issue or position.

We ask that you take our letter into consideration when you are making the decisions for this critical bylaw the future of Short Term Rentals in Charlottetown.

Let's work together to move Charlottetown forward into the future, be proud of our city and make it a better place for generations to come.

Philip and Kelli Tweel

As you evaluate and consider the comments presented at the recent STR meeting I would like to suggest that you take the time to tour some of the STR accommodations in the City and assess for yourselves the impacts they are having. I think you will find that considerable investment has gone into these facilities and that each one offers a unique, attractive, AND affordable option for visitors. These renovations have greatly enhanced the City, contributing to having our city become recognized as one of the best cities in Canada to visit and live in. It can be said that the recent investment of small-time entrepreneurs who have purchased and renovated houses in Charlottetown in order to make them available to tourists is a primary contributor to the beautification and attraction of our city.

STRs have become popular world-wide because they offer a much needed and more appealing product than standard motel/hotel rooms for travelers. If it were not for STR's many families simply would not be able to afford to come to Charlottetown. Many of these accommodations also offer much needed winter housing for students, and people in the process of re-settling to Charlottetown. This in no way diminishes the need for affordable housing. However, they are very separate issues. The recent proposal by City planners, and the rather naive proposals by Green MLAs are simply out of touch with the bigger picture that should be recognizing the value we entrepreneurs have created regarding the visual, economic, environmental and social enhancements to our city.

It is incumbent upon the City Council to find other means to address the need for housing without damaging the important value of STR's in serving our tourism industry. STR's also provide employment and they generate revenue to other small businesses, service providers and tradespeople. Without a doubt, the COVID-19 pandemic has put an enormous strain on many small business owners, particularly those of us in the tourism accommodations sector. New restrictions and additional taxes will likely bankrupt many self-employed entrepreneurs and have a chain reaction of related businesses that supply them. Those of us who made substantial investments in renovating STR's have followed the rules, registered our properties, paid our taxes, employed numerous trades people and service workers. As someone who has both short term and long-term rentals we can attest to the fact that our long-term tenants have been a much greater problem. Long-term tenants tend to care less about landscaping the property. They often neglect to inform landlords about needed repairs until the problems become major issues. Over the years our long term tenants have become the cause of numerous neighborhood complaints, police raids and city by-law violations. On the other hand, STR guests have been cordial, respectful of neighbors' privacy and valued contributors to events and festivals that Charlottetown hosts. Rather than imposing additional regulatory hardships on the entrepreneurs that are helping to enhance our city, we suggest that City Council investigate what other cities have done to address the affordable housing crisis. I propose three rather simple solutions that can have immediate, long-term and effective impacts on addressing the problem.

First, I remind you of the efforts initiated by the late Jim Munves. Jim was a strong advocate for Island-wide mass transit. He helped conduct a thorough study that demonstrated how an Island-wide bus system would help revitalize rural PEI and address the critical need for affordable housing. While we can all agree that housing is an essential need for everyone, not everyone needs or wants to live in the urban centres. However the cost of owning and commuting in a car is too expensive for many people. So, many people are forced to seek housing in the City. The new Island-wide transit system is providing a low-cost means for people to commute to Charlottetown for work and other services. Accessible transportation that connects people and jobs is fundamental to creating economic opportunities that will also help ease the housing issue.

My second suggestion is for the city to allow and even encourage increased population density. From Halifax to Vancouver many urban residents are building tiny houses, micro-apartments or right-sized studios in the homes and backyards of urban houses. The trend seems to appeal to all kinds of people from youths to seniors. Many of the houses in Charlottetown have unusually large yards for a city. Quite a few even have barns left over from the days when people kept horses and livestock. The trend toward tiny living can reduce the residents' cost of living, provide supplemental income to property owners and help create a more vibrant city. Charlottetown City Council did pass an amended by-law to allow for backyard studios. However, the new law

requires a minimum of a half-acre lot. This is unreasonable and needs to be amended to much smaller lot sizes. Recognizing the impact that the lack of affordable housing can have to the health of the local economies is not a unique problem to Charlottetown. Many major cities have implemented programs that engage employers in providing financial support for workforce housing. This leads to my third suggestion. According to Robert Hickey, senior research associate with the USA Center for Housing Policy, Los Angeles, Seattle, San Diego, Santa Monica, and San Francisco - cities with some of the least affordable housing, require developers of new commercial, industrial, or retail properties to pay a "linkage fee" to help meet the need for workforce housing created by the addition of new jobs. These fees are usually charged on a per-square foot basis and deposited into a housing trust fund, which are usually operated by nonprofit housing developers to support the construction or rehabilitation of high-quality, low-cost housing over the long term. Mr. Hickey says, 'In each of these cities, linkage fees have generated millions of dollars in much-needed revenue to create affordable homes. By establishing a direct connection between new jobs and the need for new homes, these fees help to make it possible for families to live in the communities where they work, which also helps reduce traffic congestion from long commutes.'

I hope Council will seriously consider these suggestions as an alternative to the heavy handed regulations as proposed by your planning staff. Thank you.

Sincerely,
Phil Ferraro and Nancy Willis

Please accept this letter as a show of support for the STR owners in Charlottetown. I do not own or operate any STR's, however; I feel these independent owner/operators, who invested their money and efforts into establishing a small business, do not deserve to be told by City staff or City Council to either cease operations of their STR's or sell their properties. Where it is City's staff's jurisdiction to dictate what citizens choose to do with their personal properties, I fail to see.

The city is to be applauded for taking the initiative to begin to address the "affordable" housing crisis in our city. However targeting the STR operators, essentially the "little guys", is very misdirected. If the city does indeed shut these operators down, such action will have very limited to nil effect on the actual "affordable" housing crisis in our city. If you compare a current rental apartment in the "affordable housing" price range in Charlottetown, which is \$700 - \$900 per month, with the quality and level of the vast majority of STR's it is very clear to see these units are in totally different ball parks. Many of the "affordable" units priced around \$700-\$900 are generally older, and in many cases run down units which have had no updates in many years. Conversely, the majority of STR's units are updated, clean, fresh and modern units. With that said, to put most of these STR's on the LTR market the asking price per month for rent would land anywhere from \$1400-\$3000 per month. Based on this reality, it is very unclear how it is

realistically felt shutting down STR's is a major component to alleviating our "affordable" housing crisis. In my opinion if the "affordable" housing crisis is to be minimized the threshold of what is considered affordable in Charlottetown must become more realistic. Currently big developers are being given (generous loans) billions of dollars from Ottawa under the guise of "affordable" housing, yet this threshold for Charlottetown is established at around \$1500. The amount of \$1500 per month for rent in Charlottetown for low income people is well beyond reality. The below-noted article highlights the fact big developers, such as those in Charlottetown, are circumventing this loan program by receiving money from Ottawa under the guise of developing "affordable" housing. If anyone in Charlottetown really thinks a threshold of \$1500 is reasonable for "affordable" housing units in Charlottetown I would suggest they have lost touch with reality.

A solution or partial solution to our "affordable" housing crisis, if people want to be real, is to fix this program. I would suggest one of three options: 1) Have the threshold for "affordable" housing reduced to \$900 in relation to this program. With the lowering of this threshold Big Developers can decide whether they will adhere to this threshold or not participate in the program. Hence not receive any money from Ottawa. Basically a case of developers being either "on the boat" or " off the boat" in regards to this program. 2) Government pay developers to build "affordable" housing units. Once the buildings are completed, government would then hand them over to non-profits (such as Parkdale Sherwood Lions Club) to manage and maintain these properties. 3) Government build and operate these properties. This would be the last option as due to labour market shortages this could lead to more difficulties for developers to employ skilled trades people. Assuming the government took many of these tradespeople away from private industry. Here is the news article I refer to if the link does not work then copy and paste into the address line to view:

<https://www.cbc.ca/news/canada/nova-scotia/rental-construction-financing-cmhc-loans-average-affordable-rent-1.6173487>

In closing I fully support the STR owners. I do not understand the rationale whatsoever as to how closing down STR's is going to increase rental property options for marginalized or low income Islanders.

Steve Leclair

This letter is a follow up to my comments at the public meeting last evening on Nov 9th. I ran out of time due to technical issues.

I asked the question last evening (and several times before) "How many Tourist Accommodation Licenses have been issued since the beginning of time? Mr. Zilke answered me ZERO in a personal meeting we had with Mike Duffy in the fall. Last evening, he could not remember or answer the question. I asked this question again via email to Mr. Forbes before the public meeting and I was assured by him that all my questions could be answered at the meeting. Still no answers.

Since 2013, and the rise of STR's in Charlottetown, the City has not issued a single license (maybe a few were issued this year to make it look good).

The real question is why not?

It doesn't matter if the little BOLD disclaimer saying "you require a Municipal license" on the TELA form is there or not if the Province goes ahead and gives you a license number to operate, takes your money for fees and inspects your properties. **A provincial license supersedes a municipal license, in the eyes of the law.**

In 2013-2017, more and more STR's came on the market. The City was well aware this was happening. At this critical point, why wasn't the public educated on what permits are required to rent your home in the city? **The province took that exact strategy and ran a public awareness campaigns on radio and TV to have your property licensed through the province.** That message reached us, and we promptly got all our properties licensed and inspected 5 years ago. We, along with all other STR hosts, thought we were doing everything by the letter of the law.

Now, here is the problem. We have been operating our STR units for the last 5 years thinking everything is legal and above board. But now, the planning board thinks it's fair and reasonable to tell us to shut down our STR businesses and sell the properties or rent them long term? If the City properly communicated to the citizens of Charlottetown what exactly is required to rent a STR, we would not be having this heated debate. If we had of known we needed a city permit as well as a provincial permit, we would have got one. And if we couldn't get a permit from the city, we would of never got into the STR business or completed any renovations to our downtown properties.

Why not admit the planning department and the City dropped the ball years ago by not educating the public on what is required to rent your home? The only reasonable and ethical action to take is to grandfather provincially licensed properties, as we are all operating legally. Moving forward, put whatever regulations in place. This is the easiest, quickest and most fair solution to all citizens. We would like this matter resolved as quickly as possible as we are getting tons of bookings for 2022 and 2023 Canada Games.

I would also recommend all STR's pay the appropriate tourism/business taxes, the same as hotels.

Finally, I would like to see a working committee formed of STR owners both commercial and single unit owners, members of the city and provincial governments work together to find the best solution for Charlottetown and the province. I believe it's possible.

Thank you!

Terrie Williams

As I know you are aware, I am a landlord in the city and my properties are mostly located in Downtown DN (500 Lot) or the Waterfront Wf zones.

I have also been in the property development business for the past 30 years and I have renovated over 50 properties in Charlottetown. Most of these properties were older properties, some dilapidated and even some that were deemed “Drug houses” and an eyesore for the city have been renovated. My current rentals range from low or affordable housing to mid-range and a few higher end properties on the Charlottetown Waterfront. Some of my tenants have been with me for over 25 years and are the foundation of my rental business.

I also have some Short Term rentals which represent about 10% of my overall rental business. Having been in the business for this period of time, I feel that I have gained some significant insight into the long and short term rental situation in the City of Charlottetown.

I am writing to you today on the proposed regulations that are being considered for Short term rentals in Charlottetown. The Short Term rental industry in Charlottetown has been singled out by the Affordable Housing Advocacy groups as the cause of the lack of affordable housing in Charlottetown. This is not the case and it is very unfortunate that the Affordable housing groups have been led to believe that it is. There are currently 83 licenced and inspected Short Term rentals in the City of Charlottetown according to the Province of PEI Tourism licencing. None of these properties would ever be deemed affordable housing if returned to the rental market.

The only way to create affordable housing is to build affordable housing, it is as simple as that. The provincial and federal governments have to take ownership of this issue and stop forcing municipalities like the City of Charlottetown to have to deal with the affordable housing issue by restricting a growth market like Short term rentals which is a critical tool in the growth of Tourism in Charlottetown. I also believe that the city has to deal with current factual information to make an informed decision. The city is using a study that was done in 2019 in regards to STR rentals. Since 2019 and due to COVID, the STR industry has been decimated and is now about 20% of what it was in 2019. I am also very concerned how the process has been executed thus far. Mr Zilke, the city’s employee has been very one-sided and biased in public and in the media on his position on short term rentals. A city planner should not serve as an advocate for a regulatory regime during a public consultation process. The STR restrictions that are being proposed (i.e Principle residence only) is going to be a grave mistake if this proposed bylaw is accepted by council. This proposed bylaw will eliminate an industry that is vital to the Tourism growth of the City of Charlottetown.

Also this proposed bylaw would allow an STR rental in any residential zone in the city, I feel that STR’s should be only located in the zones in which the Hotels and Inns are located and where the Tourists want to stay.

I do feel that some regulations are necessary for short term rentals in the city. I would like to respectfully propose the following:

- Allow STR rentals in the DN (500 Lot) & WF (Waterfront) zones only. These are the zones where the majority of tourists want to stay and where the hotels and Inns are located.
- All short term rentals have to be licenced and inspected.
- Impose a levy similar to that of the Hotel and Motel industry.
- Existing licenced and inspected STRs should be grandfathered or allowed to continue as non-conforming use.

I have also attached some suggestions on the last page for your consideration.

As you are aware, I am the City of Charlottetown's representative on the Charlottetown Area Development Committee. I will be respectfully not taking part in any public meeting or consultation as I do not want to put myself or the City in a conflict of interest situation. Please accept this letter as my presentation to you as a member of Council.

In closing, I am appealing to you Alanna, as councillor, to do the right thing for the city. Imposing such a short sighted restrictive bylaw that is currently being proposed would be a critical mistake by the city. I am humbly asking that you take my points in this letter under consideration when you are making your decisions on the future of Short term rentals in the City of Charlottetown.

Terry Hennessey

I am writing to email in concern over the new proposed changes to the STR market, specifically Airbnb's. I was unable to attend the recent public meeting, but **I would like my opinion recorded.**

My family and I travel a lot and we always choose to stay in Airbnb properties. These properties and their owners are always more welcoming than your standard hotel, and they offer all the amenities of home. Staying in an Airbnb is a more economical way to travel. Most homes offer you a full kitchen, many bedrooms, and bathrooms. Rather than all of your family being stuck in one hotel room, an Airbnb offers more space and privacy. Best of all it saves money so people can travel more. Because we save money staying in an Airbnb, we tend to spend more in the surrounding communities we are visiting.

I am very concerned over the potential upcoming changes. Communities need Airbnb's as they stimulate local economies. When a tourist stays in a STR they will spend more money out in our community by staying longer at their vacation destination because they have all the comforts of home.

I have travelled the world and each time I travel, I always choose a STR versus a standard hotel. If you take this option away, I personally will travel less, and I am sure others will feel the same. Less tourists will visit our Island, as there will be less places to stay and definitely higher costs to do so. Hotels and cottages charge so much during our busiest season, STR are a great alternative.

I live in an area that has a number of Airbnb's. I actually live beside a home that is used as an Airbnb during the summer months. We have never had an issue with any of the renters. Actually, tourists take better care of a home they have rented as they see pride of ownership, and respect the property more than a hotel room. They tend to be less disruptive and more respectful of others.

I hope you read my email and really think about my comments when you are putting forth your changes. Please allow the Airbnb's to remain as they are. **I support any STR operator that is currently licensed under the provincial tourism act and strongly agree that they should be grandfathered in. I take a firm stance on this matter.**

We need STR's , and so do our communities.

Vikki Woodhead

I knew there was talk about shutting down STR in
 Chitown, but never thought the city would allow this until
 I watched the news a few weeks ago and a city Employee is ^(planning) ^{Dept.}
 telling us we can just sell our homes

So let me start with a little history on our property on King

I lived next to this property for 22 years the building
 was

- In terrible shape (always) - Rotted wood, Broken windows etc.
- Garbage left around
- Non stop traffic over the years for what ever reason
- Not all tenants were bad, but the last year before we purchased
 the place, one unit had ~~bed~~logging, the traffic was unbearable, Police would
 be involved, arguments, and so on
- and one of the other units from whom we purchased it
 they never paid the rent for 6 months.

Needless to say the building was shut down
 and a 2 year Renovation was completed, 100's of thousands of
 dollars the building returned to the way it was when
 moved there in 1890. anyone living in the surrounding area
 who never happened.

Final comment

The guests who have stayed at our wonderful home
 one of the big reasons for Airbnb is they don't have
 to deal with hotels other guests & hotel staff
 they feel much safer.

With all this being said we could never go back
 to renting long term.

Tim Driscoll
 165-167 King St.

ATTACHMENT K

Oct 27, 2021

Dear Mayor Brown and Members of Council:

It is with great concern that short-term rental (STR) operators read the comments in the Guardian from your employee, Robert Zilke. As a municipal government employee, he should be neutral in this debate and upcoming consultation process.

On what basis does a city planner serve as an advocate for a regulatory regime which is allegedly the subject of an upcoming public consultation? How can you possibly believe that STR operators in Charlottetown view the pending consultation as fair and open in light of the stage your employee, Mr. Zilke has set?

Mr. Zilke's comments were not only biased, but factually incorrect. 91% of operators STR's on Airbnb in Charlottetown have 1-2 units, with the average unit renting out 19 days in a year (data directly provided by Airbnb on Oct 25, 2021). A fair and equitably regulatory framework can't be built upon erroneous information led by someone with publically-proclaimed biases.

To this end, we are asking that Mr. Zilke be removed from the STR file given his very public and one-sided comments.

We urge you and your colleagues on Council to recognize that STR's play a key role in the tourism sector in a city and province that relies heavily on visitors to support our economy. We also recognize and acknowledge that access to affordable housing is a challenge in Charlottetown as it is in every city in Canada. However, any notion that the overregulation or in some cases outright banning of STR's is going to fix the affordable housing challenge is as misguided as it is dangerous.

We expect a response on this very serious matter.

Sincerely,

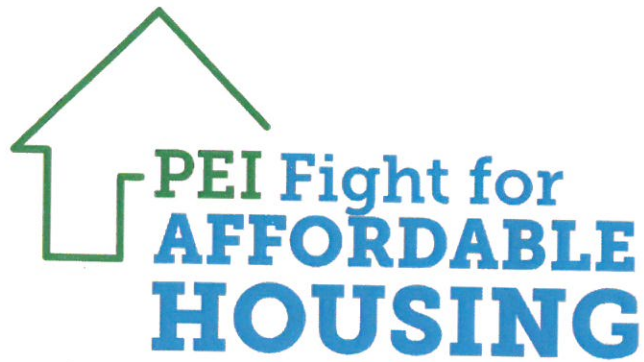
1. Terry McKenna
2. David Toombs
3. Terrie Williams
4. Nora McKenna

ATTACHMENT K

5. Janeen LaForme
6. Don MacLean
7. Cathy Anne Hennessey
8. Dico Reijers
9. Steve Murphy
10. Christine MacQuaid
11. Myrtle Jenkins-Smith
12. Vaugh Smith
13. Steve Barber
14. Tim Driscoll
15. Ellen MacDonald
16. Lisa MacDonald
17. Lori Kays
18. Doug Hurry
19. Sharon Larter
20. Susan Roggeveen
21. Mitchell Roggeveen
22. Phillip McInnis
23. Scott Dickieson
24. Phillip Tweel
25. Kelly Tweel
26. Leslie Condon
27. Michael MacDonald
28. Steve Sawye
29. Craig Rout Gallant

ATTACHMENT K

30. Tyler White
31. Renee Williams
32. April Clow
33. Santina Carmichael
34. Nancy Godkin
35. Steve Godkin
36. Steve Fudge
37. James Ormston
38. Jayne Toombs
39. Brodie MacPhee
40. Tracy Warren
41. Rebecca MacQuaid
42. Ron Hatelly
43. Sarah Dougan
44. Matt Lewis
45. Karen Cudmore
46. Eugene Sauve
47. Leslie Beck
48. Leonard Williams
49. James Kilbride
50. Vikki Woodhead



To the City of Charlottetown's Mayor, Councillors, and Planning Board,

This petition contains 920 unique signatures supporting regulating short-term rentals according to Scenario 1 or 2 as proposed by the Planning Department in the consultation on May 17th, 2021.

The signatures have been gathered in two rounds, the first in 2019 and the second in 2021. Each round gathered nearly the same amount of signatures—the second doing so within two weeks—which shows that support for regulation is strong and long-lasting.

611 of these signatures are from Charlottetown residents, while 309 are from the surrounding area—primarily Cornwall and Stratford, and other communities further away. We have included these signatures in this petition because Charlottetown is both the province's capital and largest concentration of housing—the market here decides the market everywhere else. The by-law that you will make for short-term rental regulation will affect housing across Prince Edward Island.

Each petition sheet repeats a statement of support for owner-occupied regulation with well-defined requirements. We urge you to heed the support of nearly a thousand Islanders and develop strong regulation of short-term rentals in line with either Scenario 1 or 2. We need homes, *not* hotels.

From,
The PEI Fight for Affordable Housing

Petition: Homes, not Hotels!

Charlottetown is in a housing crisis, exacerbated by the short-term rental (STR) market. Available housing and affordable rents require strong regulation of STRs. We the undersigned support regulating short-term rentals to owner-occupied residences only. These residences (house or apartment) must be where the host lives for at least 185 days out of the year and has listed as their primary address on their bills, ID, and taxes. We do not support STRs in commercial or Domestic Mixed Use Neighbourhood zones.

We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Max Riley	1-1	timber.riley@gmail
	Morag MacKenzie	1	maccaineac@hotmail.ca
	Karyn MacPhee		karynmacphee@gmail.com
	Kelly MacEachern	1	MacEachern69@gmail.com
	Sherr Ramsay	1	slramsay3@gmail.com
	Nancy Ramsay		nmramsay@upeir.ca
	Sarah Outram	11	sarahoutinnature@gmail.com
	Pelumi Ajao	1	oajao@upeir.ca
	Daniel Dai	7	daniell0227@gmail.com
	Sarah MacKinnon	1	sarmackinnon@upeir.ca
	Gordon Lam	1-7	gordon.lam70@yahoo.com
	Manu Jose	9-5	Manu.mijose@gmail.com
	Jason SARK	1	jason.sark3@gmail.com
	Michelle Val	Westley Muir	michelleval@gmail.com
	Alex Wood	Cornwall	
	W. Waterman	1	
	Abigail Hameline		902 326 5347
	CAROL SMITH	1	902 892-1777

By signing I authorize my name being made public in supporting this petition.

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We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Luisa Fernanda Guiza	1	luisafernandaguiza@hotmail.com 702-377-0319
	CHRIS Grandner	6	902-489-7813 Grandner Chris 50@gmail.com
	Alexia Montezano	1	alexia.scottm@gmail.com 978-992-2902
	Thompson Gammons	6	tfegammons@gmail.com 902-329-7317
	Ian Wallace	4	ianwallace@gmail.com 902-218-8771
	Greg Gill	Stratford.	greggill@hotmail.com 902-393-7582
	Kevin Rich	1-	
	Garrett Curley	3	902-343-8987 garrett.sullivan@curley@gmail.com
	Andre Uytendaele	6-1	andre-u@hotmail.com 902-978-1457
	Joshua MacNeil	2-6	joshua.macneil83@gmail.com 902-916-5086
	Emily Murray	8	esjm42@mun.ca 3115-1781
	Zubir Mistay	6	mistay@yahoo.com
	CHANDRAH TRAY	4	chandrah389@gmail.com
	Sam LeLanc	3-4	902-626-6867
	Matt Gille	69	
	Clint McMuray	Stratford	902-316-2657
	Stephen Frost	4	902-940-9035
	Lauren Krieg	Bonshaw	902-916-3070

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	David McQuille	Brighton	902 916 3451
	Sophia Whichee	Brighton	204-226-7365 sophw3@gmail.com
	Sylvia Forsythe	Brighton	402-593-8029 sylviaforsythe@gmail.com
	Luke Beird	Downtown	902-354-7962
	TED LOCKIE	Downtown	403 542 7209
	Elaine Murphy	Windsor	862-388-2632
	Lorena Lujan	Downtown	902 213 8806
	Kiara Fernandez	Downtown	902 330 0651
	LIZA WENDT	Brighton	302.566.2927
	Kelsey Hubby	Hillside/L	902-3145821
	Ella Boyes	Downtown	902 3K 2624
	Chanel Briggs	Downtown	902 330-4548
	MIYAH MISTAL	DOWNTOWN	403 703 9620
	Rick Dube	Windsor	902-566-1200
	Kyle Burner	Downtown	902-978-1426
	Corbett Matthews	Downtown	902-916-3175
	Matthew Gregory	Downtown	902-626-8864
	Alison DesRoches	Downtown	902 916 5649

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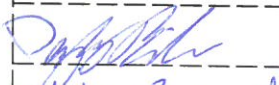
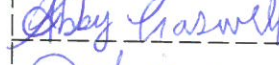

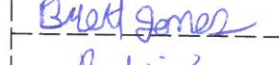
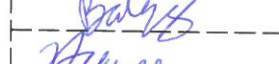

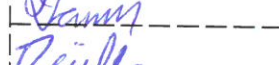
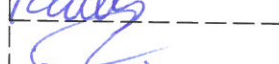

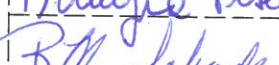
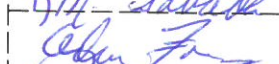

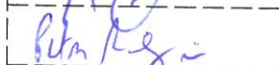
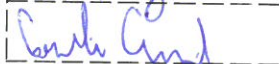

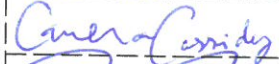
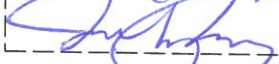

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>BMorley</i>	Olivia Morley	9-1	902-393-8021
<i>AMurphy</i>	Alex Murphy	9-1	902 940 6203
<i>JWhite</i>	Charm White	9-1	902-218-8185
<i>Alexa McClure</i>	Alexa McClure	9-1	902-393-6273
<i>Jack Ross</i>	Jack Ross	9-1	902-626-5253
<i>VRamero</i>	Victoria Ramero	5-1	(902) 3940220
<i>Libby Douglas</i>	Libby Douglas	3-6	902-629-0271
<i>Jonathan Schot</i>	Jonathan Schot	1	902-218-0226
<i>Victoria Denis</i>	Victoria Denis	Cornwall	902-807-9041
<i>Lara Mullally</i>	Lara Mullally	Stratford	902-393-3080
<i>Jennifer Moss</i>	Jennifer Moss	9-6	902-330-6670
<i>Matthew Joseph</i>	Matthew Joseph	2	289-407-2427
<i>Chantal Hayman</i>	Chantal Hayman	3	613-762-1352
<i>Ben Wheeler</i>	Ben Wheeler	1	902-218-7555
<i>Lanis Wheatley</i>	Lanis Wheatley	Stratford	902-388-1562
<i>Debbie McMillan</i>	Debbie McMillan	Cornwall	902-629-9829
<i>Adam Smith</i>	Adam Smith	Georgetown	902 313 0251
<i>Noelle Elliot</i>	Noelle Elliot	10-7	705 331 0524

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Petition: Homes, not Hotels!

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We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Dempsey Bicker	5	209-577-3828
	Abigail Craswell	5	902-629-9711
	Jen Whiten	1	902-367-8218
	Brett Jones	marshfield	902-629-9355
	Nik Balgis	stratford	902-213-8840
	Brandon Mackean	Winsloe	902 213 8039
	Damon Callart	Winsloe	902-353-3550
	Reilly Mackenzie	Warrens Grove	902-388-6241
	Robert Tierney	Spring Park	416-371-7211
	Wayne Pike	5	902-315-0020
	R.M. SABAM	1	902 842 2785
	Aden Francis	1	902 940 2926
	Allison Holmes	1	902 213 7212
	PETER MacSweeney	1	902 388-5409
	Caroline Enserink	7	902-916-4459
	Adam Shea	7	902-316-3530
	Cameron Cassidy	1	902-393-7658
	Jace Ruyone	1	774-826-5400

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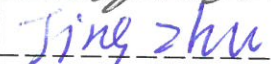
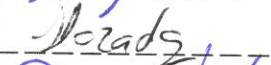

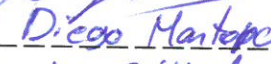
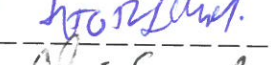
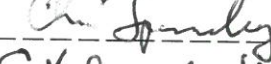
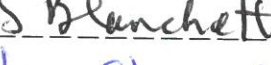

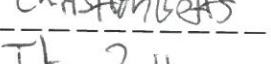
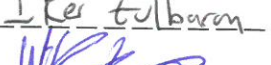
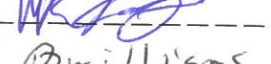



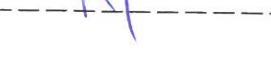
SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Margyrene Moreland	Spring Park	902 416 3342
	Victor Lund	Ward 5	(902) 213 2087
	Dylan Phillip	2-1	902 916 4495
	Mathew Carr	1	902 809 9872
	Brechan Maclean	1	902 213 7858
	Ridge Crane	1	902 377 1717
	Saigra Hussain		902-940-5085
	Melissa Soth	1	902-218-7225
	ADRIAN CHAUHAN	1	902-416-2375
	Kinley Pauling	1	902-316-0032
	Lisa Whalen	1	902-629-4886
	Akelia Skeete	1	782-377-3320
	Stephen Doyne	1-1	902-388 7240
	Zoc Pocock	1	902-330-3217
	Hannah Rose	1	902-940-1641
	John Fox	1	902-316-3365
	Jacob MacDermid	Stratford	902-327-3475
	Antwawn Rolle	5	902 218 772

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We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Faith Harrison	Mount Stewart	fharrison881@gmail.com 902-213-0039
	Tim Rees	Mount Stewart	timrees96@gmail.com 902-300-0039
	Sam Midkiff	5-3	SMidkiff177@gmail.com
	Jing Zhu	5	Zhutinero8@gmail.com
	Rafael Lozada	1-5	rlozada@hotmail.com
	Doug Week	6	dsweets@ede.pe.ca
	Diego Montano	7-6	902-393-1664
	Hector Mahecha	1-1	581-745 9698
	Chris Spenceley	9	
	Suzanne Blanchette	2	
	Leo Cheverie	2	902-940-5635
	Christian Betts	2	902-856-0805
	Iker Zulbarin	1-9	902 213 5302
	Matt Kars	2	907-303-5127
	Brandon Williams	1	902-218-0397
	Daniel Godoy	2	902-314-8780
	Jon Mallard	3-3	506 875 8901
	Ross Hastie	HA201600K	002-314-6652

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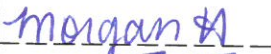

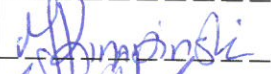



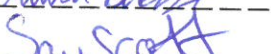



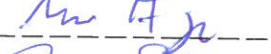




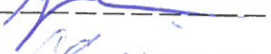
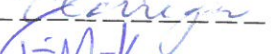
SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	SIMON VICK	1	902-314-5112
	Nathan Butler	1	902-393-1301
	Heather Ferber	1	902-940-9712
	Natalie Wilson	Stratford	902-314-4636
	CRAG ANNAND	Stratford	902-759-3095
	Patricia Noonan	Cornwall	~ 626-8875
	LEITH CHIU	4	902 388-0693
	Danni L. Mohel	5	902 314 1894
	Myer MacNeil	Cornwall	902-394-0731
	Nova Asenault	4	902-330-1917
	Chris Chavone	8	902-218-5889
	milee Grang	1	394-0774
	TRACY STRETCH	1	902-314-5966
	SHAKEEM THOMPSON	Watt 5	782-572 3018
	Gabrielle Smith	5	902 393 7402
	LYRIC CULMER	5	902 388 5558
	DAVID BIAT	4	902 424 5963
	ROGER COLLETTE	4	NONE

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We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Michael Vais	6	902-393-4214 michael.vais@hotmail.com
	Morgan H.	6	902-318-4393 morgan.harrison@hotmail.com
	MICAH THOMAS	3	940-1595 MICATHOMAS@gmail.ca
	Grace Kimpinski	6	902-393-4589 kimpinski92@gmail.com
	Teri MacLennan	1	902-258-5184
	Nicole April	Cornwall	902-844-1654
	Larisa Borge	Stratford	902 940 1719
	Sam Scott	Cornwall	902 314 6098
	Ben Velasco	9	902-314-2895
	Brandon Howard Roy	4	514-701-1918
	Marc Hogan	Mermaid	902-916-0699
	Renee Silver	mermaid	519-639-6027
	MATT ACORN	9	902 388 5655
	Amanda Gallant	9	902-388-5655
	RYAN CRANE	HARRINGTON	672-1475
	CONNIE CORRIGAN	SHERWOOD 2-3	902 620 9487
	Travis MacKenzie	1	902-808-4336
	Ashley Higgins	1	902-598-8110

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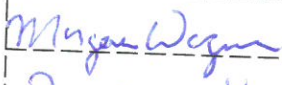
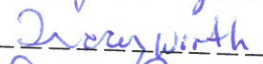
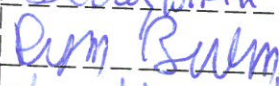
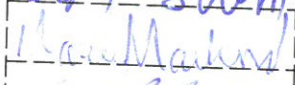
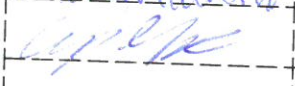
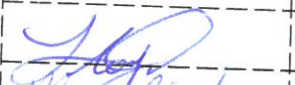
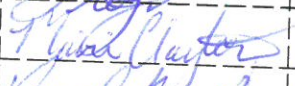
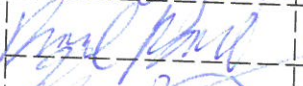
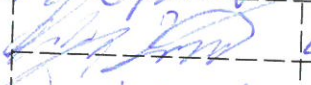
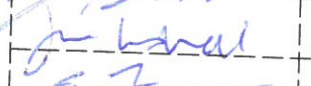
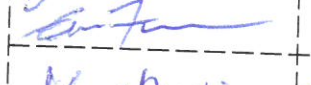
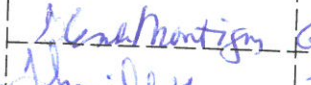
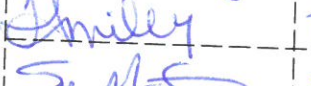
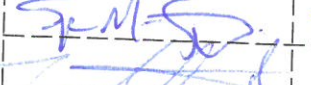
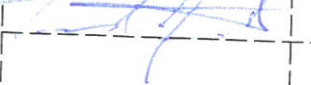
SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>Joanna Howlett</i>	Joanna Howlett	25 Selkirk Crescent	902 393 0804
<i>Morgan Sandiford</i>	Morgan Sandiford	"	782 377 4441
<i>Susan Campbell</i>	Susan Campbell	Cornwall	
<i>Denise Morgan</i>	Denise Morgan	Vernon Bridge	902 621 3455
<i>Graham Ching</i>	Graham Ching	266 Grafton St	902 394 3249
<i>MaryAnne Fitzpatrick</i>	MaryAnne Fitzpatrick	Mike Duffy	902 213 2355
<i>Matthew Zawacki</i>	Matthew Zawacki	1000	902 592-8642
<i>A. Simpson</i>	Andrea Simpson	Strathford	213 4405
<i>H. Chapra</i>	Helen Chapra	"	394-3973
<i>H. MacWilliam</i>	H. MacWilliam	C-Town	213-7646
<i>Kara Bernard</i>	Kara Bernard	Shenwood	213-5802
<i>Chao Jing</i>	CHAO JING	4	438-397-0825
<i>Max Knechtel</i>	Max Knechtel	4	902-314-7367
<i>Meg Preston</i>	Meg Preston	5	902-940-6132
<i>P. Payne</i>	P. Payne	Ch. town	902-388-4154
<i>G. Lerner</i>	G. Lerner	C 3	902 978-1020
<i>Gabrielle Lerner</i>	GABRIELLE LERNER	C 3	902 978 1020
<i>Shirley MacLennan</i>	SHIRLEY		(902) 566-5527
<i>Bruce MacLennan</i>	Bruce		" "

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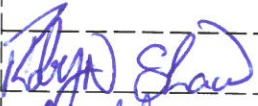
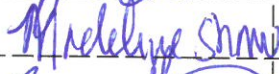
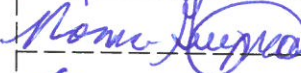
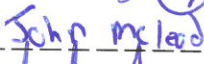
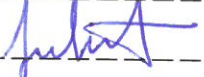
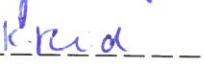
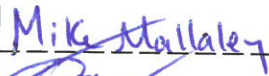
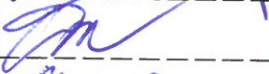


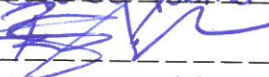
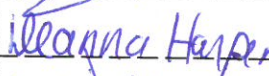
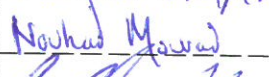
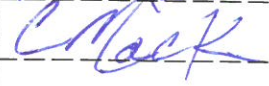
SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Morgan Naylor Wagner	Cornwall	902 218 0305
	Tracey Worth	down town	902 393 1773
	Ryan Baker	Sherwood	902 394-018
	Maria Haines	downtown	902 626 9119
	Craig Norton	Ch'town	" "
	Lloyd Robinson	Kirkcaldy	902 314 1245
	Mari Clayton	Cornwall	902 940 0720
	Darryl Bernard	ch'town	V V V
	Garry Bernard	ch'town	218 7690
	Jane Ledwell	Ch'town W4	902 892 2940
	Evan Furness	Vernon Bridge	902-394-4824
	Glenda Montigny	Ch'town	902 628-5365
	Taylor Smiley	Charlottetown	902 218 6444
	Spencer Montgomery	Charlottetown	902 388 6977
	David Saulte	Charlottetown	902 716-5653

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Petition: Homes, not Hotels!

Charlottetown is in a housing crisis, exacerbated by the short-term rental (STR) market. Available housing and affordable rents require strong regulation of STRs. We the undersigned support regulating short-term rentals to owner-occupied residences only. These residences (house or apartment) must be where the host lives for at least 185 days out of the year and has listed as their primary address on their bills, ID, and taxes. We do not support STRs in commercial or Domestic Mixed Use Neighbourhood zones.

We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Robyn Shaw	8-6	3raesh@gmail.com
	Madeline Shaw	8-6	mdashaw@gmail.com
	Norma Guignard	Brackley Beach	—
	John Mackod	Montage	Shi101@hotmail.ca
	Jessica Reket	Charlottetown 1	jreket@gmail.com
	Kyra Reid	Cornwall	709 639 2362
	Mike Mallaley	1	mikemallaley@hotmail.com
	Damian Morley	Cornwall	902-393-7903
	Katie Green	Charlottetown 7	katie-green10@live.com
	Stacy Palmer	Charlottetown 6	
	B. Shachar	Ch'town 6	
	Deanna Harper	Ch'town 10	(902) 892-0055
	Nourad Mourad	Ch'town 4	nourad.mourad@upei.ca
	Corey Mackenzie	Ch'town 4	coreymackenzie@gmail.com

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We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>[Signature]</i>	MARTINA	1	902 940 1770
<i>[Signature]</i>	Cindy Riley	East Royalty	902 393-4491
<i>[Signature]</i>	Rory Morrissey		
<i>[Signature]</i>	Brook MacIntyre	7	902 213-8156
<i>[Signature]</i>	BRANDON B	CORNWALL	902-314-1244
<i>[Signature]</i>	Reannak	Spring Park	902 439 4704 dea
<i>[Signature]</i>	LILY LEVESQUE	Charlottetown	902-969-0885 LLEVESQUE@COWPEA.CA hotmail.com
<i>[Signature]</i>	DAVID PETERS	SPRING PARK	902 940 0694
<i>[Signature]</i>	Maureen Griffin	Cornwall	902 940 5573
<i>[Signature]</i>	Walter Leblanc	34- Henry St Town	902-367-2734
<i>[Signature]</i>	Evan McSham	2	902 218 7006
<i>[Signature]</i>	Mark Samkin	2	902-771-1506
<i>[Signature]</i>	Carla MacBrown	Spring Park	
<i>[Signature]</i>	JOE SMITH	1	902 716 4207
<i>[Signature]</i>	Sam Chace	Stratford	902 439 0957
<i>[Signature]</i>	Rob Drew	Ch'town	902 916 4049
<i>[Signature]</i>	Sandra Mandel	Ch'town	902-916-5089
<i>[Signature]</i>	MELISSA MACKEAGIE	Ch'town	902 940 1053

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>Connor Kelly</i>	Connor Kelly	1	jconkelly@outlook.com 902 948 3217
<i>GARY H</i>	GARY M. H	1	—
<i>Hannah Aiken</i>	Hannah Aiken	1	hannah.aiken32@gmail.com
<i>Adam MacKinnon</i>	Adam MacKinnon	Stratford	adam-malcolm-mackinnon@hotmail.ca
<i>Craig Abbott</i>	Craig Abbott	n/a	craigdabbott@yahoo.ca 393 5587
<i>Elynn Mackinnon</i>	Elynn Mackinnon	—	—
<i>Angela Simpson</i>	Angela Simpson	Ch'town	angela.simpson@gmail.com
<i>Rafe Wright</i>	Rafe Wright	Ch'town 2	rafe.wright97@gmail.com
<i>Sheila Bacon</i>	SHEILA BACON	Ward 1	902-940-6222
<i>Mike Red</i>	Mike Red	Reds Island	No phone
<i>Dawn Howatt</i>	Dawn Howatt	Hillborough Dr	902 388 7148
<i>Scorch Lovers</i>	Scorch Lovers	Walther Drive	902 629 5467
<i>Holly Noel</i>	Holly Noel	Ch'town 1	902 393 9526
<i>Christine Noel</i>	Christine Noel	Ch'town 1	902 629 0108
<i>Scott Perry</i>	Scott Perry	MISCOWCHE	902 303 1877
<i>Robert Fairclough</i>	ROBERT FAIRCLOUGH	CHARLOTTETOWN	902 954 1255
<i>Wendy Dunn</i>	Wendy Dunn	Ch'town #1	902-388-0555
<i>Michelle Day</i>	Michelle Day	Ch'town 1	902 218 0289

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>Sam. Macdonald</i>	Sam. Macdonald	1	Samuelmacd@gmail.com 902 213 8979
<i>Jacob Humphill</i>	Jacob Humphill	W 1	jake Humphill@hotmail.com 902 946 9670
<i>Anthony Welsh</i>	ANTHONY WELSH	W 1	Centre Friendswoodmundo@gmail.com
<i>G. Abrams</i>	G. Abrams	North shore	330-2204
<i>L. Smith</i>	L. Smith	1	
<i>Trena Doucette</i>	TRENA Doucette	Ch. Town	393-3919
<i>R. Pegg</i>		CH TEE	671-0000
<i>L. Macdonald</i>	L. MAC DONALD	CH TOWN	pelman@hotmail.ca
<i>Andy O'Dea</i>	Andy Jr O'Dea	NTV road	andyodea121@gmail.com
<i>Lorraine Goley</i>	Lorraine Goley	Cornwall	lorraine.goley@gmail.com
<i>Kaycee McLean</i>	Kaycee McLean	Charlottetown	kayceemclean@hotmail.com
<i>Emma Doucette</i>	Emma Doucette	Charlottetown	
<i>Bob Edwards</i>	Bob Edwards	"	393-4486
<i>Dail Michael</i>	Dail Michael	Charlottetown	902-894-9803
<i>Joseph</i>	Joseph	Ch. town	902-367-1273
<i>John</i>	John	Charlottetown	
<i>Alex</i>	Alex	May point	
<i>Maryann West</i>	Maryann West	Ch town	West67507@gmail.com

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>Rita Kelly</i>	RITA KELLY	St. Bernard	rita.kelly@yahoo.ca
<i>Barbara</i>	BARBARA	St. Bernard	barbarastick@cs
<i>Nick Murphy</i>	Nick Murphy	Alanna-Jankov	nicholas.murphy2010@gmail.com
<i>Holly Grasse</i>	Holly Grasse	Windsor	3681530
<i>David Mackay</i>	David Mackay	St. John's River	902-444-1111@gmail.com
<i>Robert Schurman</i>	Robert Schurman	9	robwschurman@hotmail.com
<i>Yueyuan Long</i>	Yueyuan Long	2	lyy1388766007@gmail.com
<i>Nathan Walsh</i>	Nathan Walsh	2	nathan.b.walsh@gmail.com
<i>Maddy DeLackman</i>	Madison Power	University Ave	maddydeLackman@gmail.com
<i>Jon Kielly</i>	Jon Kielly	Sherwood	kielly.jon@gmail.com
<i>Jim Campbell</i>	Jim Campbell	Ch'town	902-940-6462
<i>Hara Knapton</i>	Hara Knapton	University	902-844-5344
<i>Amy Caine</i>	Amy Caine	New Moore Creek	amy-caine@kafman.ca
<i>Kevin Brooks</i>	Kevin Brooks	Lwr Malpene	kevin@brooksmurphy.com
<i>Shane Coady</i>	Shane Coady	St. Aards	902-892-9866
<i>Alfred Iyie</i>	ALFRED IYIE	STANLEY BRIDGE	902-439-7003
<i>Kendall Wyman</i>	Kendall Wyman	Charlottetown	506-645-8566
<i>Alyson Brown</i>	Alyson Brown	Charlottetown	506-654-4553
<i>David Craig MacDonnell</i>	DAVID CRAIG MACDONNELL	St. BAY	902-969-0799

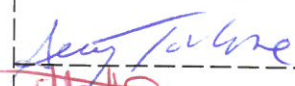
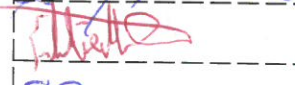
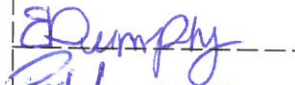
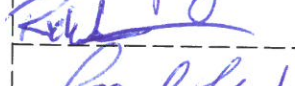


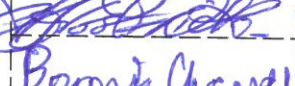
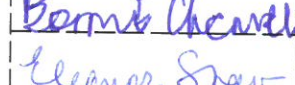
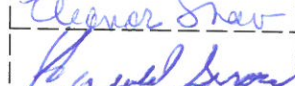
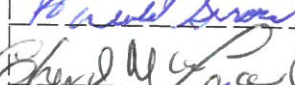
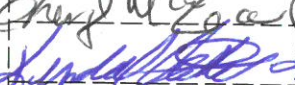
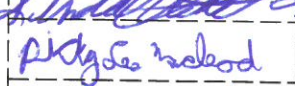
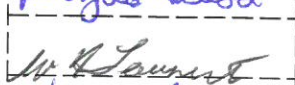
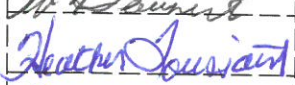
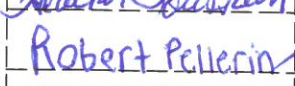
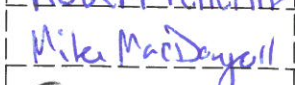
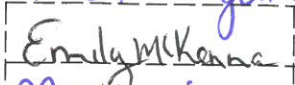
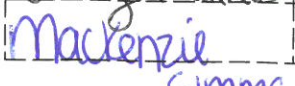

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Signature	Name	Ward	Phone # or Email
Francis Walsh	Francis Walsh		902-394-2806
Sandy Slade	Storle Sladden	Mermaid	902-976-6351
Dora Ghiz	Dora Ghiz	Wt. Ed.	902-916 5355
72	Tariss Zilken	Sherwood	902 388 8888
Jack Day	Jack Day	Sherwood	402 388 2845
JD			
Mary Woods	Mary Woods	Sauris	902-969-9579
			628-0701
Rosha	Tanya Pascher	Sherwood	629-9175
Marylou Blanchard	Marylou Blanchard	Ch'town	
Asje	Andrea Stjubo	Ch'town	778-221-1738
Charkigh Power	CP	Ctown	902-717-2455
Kris Frigault	Kf	Ctown	902 393 9356
Megan McDonald	Megan McDonald	Ch'town	902 393 6245

Petition: Homes, not Hotels!

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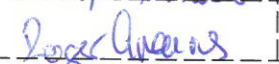
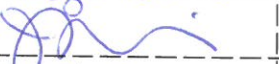

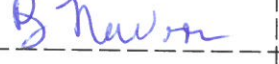
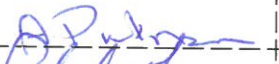
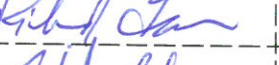

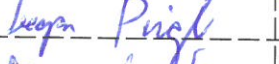
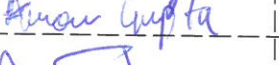
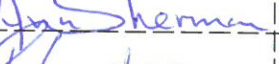
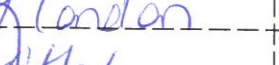
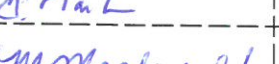
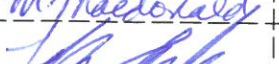


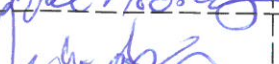


SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	GARY TORCONE	1	902-629-5838
	Elliott McNeill-McInnis	Statenford	902 330 8568
	Emma Murphy	Statenford	902-940-9873
	Richard Lawrence	Cornwall	902-626-7730
	Sarah Freeborn	Montague	902-838-3456
	Charlotte Frost-Wicks	4 Parkdale	902-213-5336 c.frostwicks@gmail.com
	Jessie Frost-Wicks	4	902-628-1657 J.frostwicks@gmail.com
	Bonnie Chanceller	Cornwall	902-218-4323 b.e.chanceller@outlook.com
	ELEANOR SNOW	4	902 213 0195
	HAROLD SNOW	4	"
	Cheryl MacLean	High Bank	902-962-3683
	Rick Lee MacLeod	Ch'town	902 393 9352
	Ricky Lee MacLeod	Murray Harbour	902 -969-4572
	BILL TOUSSAINT	STAFORD	902-368 2920
	Heather Toussaint	Statenford	902-316-1915
	Robert Pellerin	Little Pond	902-215-8025
	Mike MacDonnell	1	902.388.6502
	Emily McKenna	Cornwall	902-940-2330
	MacKenzie Simms	Ch'town 10	902-960-1187

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Leah Matheson	17 Elm Lock Court	
	Roger Creaves	Stratford	902-569-1490
	Jenni Zelin	3 Admiral St	902-628-3811
	Ksag	100 King Street	902 443 4259
	B. Newson	Fairview Dr	902 394 1000
	D. P. Ryan	Seaview Blvd.	314 4050
	RICHARD LAMM	CORNWALL	rlamm@upci.ca
	HUNTER GIVINDON	TUEEL	HUNTER.GIVINDON@HIMAZL.COM
	Teagan Pringle	Fitzroy St	teaganjpringle@gmail.com
	AARON GUPTA	QUEEN'S COUNTY	witgupta@gmail.com
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	Erin MacQuarrie	3	erinmacquarrie@gmail.com
	Megan Macdonald	Stratford	902 218 1727
	Jeremy Cadence	8	705 313 1234
	Laurie Brunklow	Ch'town	902-213-1444
	MIKE MOONEY	CIT'TOWN	569-5268
	Jacques Desjardins	Greenville	902-916-0257
	Kelly Allen	CIT'TOWN	902 213-1057

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>[Signature]</i>	PRINT <i>[Signature]</i>		
<i>[Signature]</i>	Heather Walker		902-330-8188
<i>[Signature]</i>	B. Penak		902-658-2529
<i>[Signature]</i>	Suzanne Rotherford		902-626-6600
<i>[Signature]</i>	Ivan Day	3	902-69-036
<i>[Signature]</i>	DOWNNA GURSS	<i>[Signature]</i>	902-330-2665
<i>[Signature]</i>	DANIEL OHAEGBU	ST PETER'S RD.	6479951416
<i>[Signature]</i>	Dave Ross		902-213-6431
<i>[Signature]</i>	Chris KOMBANIS	6-1	902-626-1279
<i>[Signature]</i>	Jon Mohr	6-1	" "
<i>[Signature]</i>	<i>[Signature]</i>	1	902-629-5838
<i>[Signature]</i>	DONNA WIGMORE	1	388 5487
<i>[Signature]</i>	Danielle Bryanton		902-303-3994
<i>[Signature]</i>	Will Echusmb		902-439-7834
<i>[Signature]</i>	Chris Clements	13	902 314 3645
<i>[Signature]</i>	RITA KELLY	Bernard	902-393-8980
<i>[Signature]</i>	SOPHIE CAMERON	4	902-438-1240
<i>[Signature]</i>	Shannon Martinson	6	902-393-5565

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Jasmine Michel	1	jasmine.michel@gmail.com
	Liam Bunin	1	bunin.liam@gmail.com
	Weiqi Tang	8	wtang@upei.ca
	Stephanie Griff	Cornwall	rankin-sarah@hotmail.com
	Shawn Griffin	Cornwall	deo-timney@hotmail.com
	M. Le	Chatham	onehousandflowers@gmail.com
	Alex Reuss		drreuss@gmail.com
	Brittany Jakubiec		bjakubiec@upei.ca
	Erin Pateson		falconwryder@gmail.com
	Jan Darn	Belfast	
	Alexa Reid	Chatham	alexarapeianc.com
	Kayla McCloskey	11	K.McCloskey2@upei.ca
	Norma Finlayson	1	
	Heather Irving	1	
	TERRY LINTHORNE		519 954 0055
	Jay Van der Vliet	1	
	HEATHER CHANDLER	1	hchandler@upei.ca 902 802 3764
	L. URO		resmuno@gmail.com

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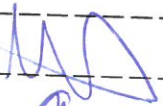
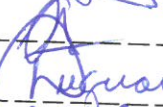
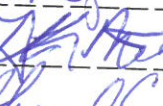
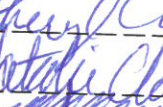
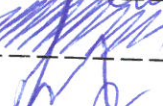
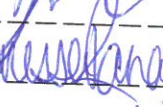
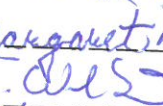
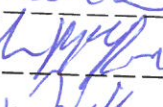
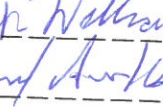
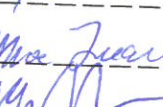
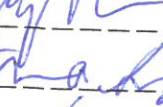
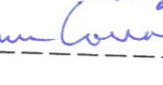
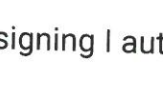


SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
Jaya Nabury	Jaya Nabury	3	902-394-7874
G. Colow	G. Colow	Meadowbank	902-394-1130
N. Perry	N. Perry	Sturges	902-687-3260
Andra Peters	Andra Peters	Montague	908-439-7064
Paul Deng	Paul Deng		902-393-9828
Mary Mitchell	MARY Mitchell		902-368-1225
Ann Braithwaite	Ann Braithwaite	5	902-367-6038
Zoie Tompkins	Zoie Tompkins	Windsor	902-393-3983
Vanira Greener	Vanira Greener	9	902-330-7188
Jack Warren	Jack Warren	brackley	902 314 3368
Kathleen Heistman	Kathleen Heistman	Ch'Town	902 393 2899
Sandra MacDonald	Sandra MacDonald	Cornwall	902 394 5036
Amor M. Craker	Amor M. Craker	Stratford	902 940 7538
Jenaye Ross	Jenaye Ross	Cornwall	902 916 3505
Sibbhan Belstar	Sibbhan Belstar	Stratford	902 620 8929
Alanna James	Alanna James	9 (Sherwood airport)	902 213 6365
Shawn Lewis	Shawn Lewis	4	902 626 7442
Tyler Schuster	Tyler Schuster	3	902 - 330 - 8959

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Petition: Homes, not Hotels!

Charlottetown is in a housing crisis, exacerbated by the short-term rental (STR) market. Available housing and affordable rents require strong regulation of STRs. We the undersigned support regulating short-term rentals to owner-occupied residences only. These residences (house or apartment) must be where the host lives for at least 185 days out of the year and has listed as their primary address on their bills, ID, and taxes. We do not support STRs in commercial or Domestic Mixed Use Neighbourhood zones.

We need homes, not hotels!

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Mishu D-M		603 227 6189
	Audrey Lemke L.		614-917-1593
	Charles Sugrue		902-213-8229
	Alison M. Mudo		902-432-0672
	Cheryl Clarke		416 938 5452
	Natalie Clarke		416-997-4934
	Molly Conn		902-314-1528
	Dan Lutz		218 40 65
	Vanessa Rahman	Charlottetown	nessaxmarie@live.ca
	Margaret MacLean	Blackburn Rd.	894-4126
	Dr. Wade Sweet		856-0140
	John MacRae		john.macrail@ gmail.1.com
	Rick Williams		940-9994
	Howard Anderson	Ch Town	902-969-6961
	Elanie MacGuerie	Ch Town	252-377-1746
	Taylor Pound	10-1	902 629 0823
	Anna Simpson	10-1	902 214-1457
	Aaron Comeau	Charlottetown 4-5	647-261-0942

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SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
	Sadra Souzanchi	Ward 8	Sadra.Souzanchi@gmail.com (519) 701-1433
	Emma Wheeler	Stuartford	902 218 2307
	MICHELE WHEELER	"	"
	OLIVIA WHEELER	"	"
	JUDY CLARK		902-393-7467
	ALAA EMAD		902 916 4920
	Marcos Ledesma	1	782 311 2650
	Hesham El-Hamshary		402 716 1241
	Allie McQuinn		902 676 2899
	Jennifer McQuinn		902 676 2899
	Brady Trimmer		902-326-9070
	Noah MacDougall	1	647-882-9862
	David Norbury	1	437 788 5372
	Seth Nelson		902 969 5439
	Alex Omedrag		902-292-6270
	Sarah Newko	9	902-388-6171
	Tara Nicholas	6	902 892 2152

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[illegible]

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[illegible]

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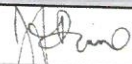
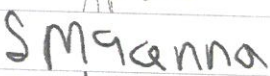
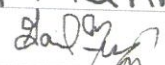
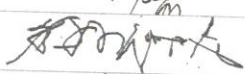
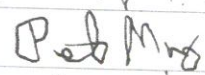
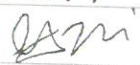

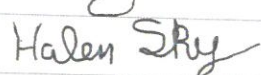
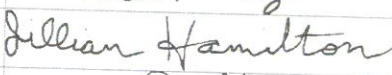
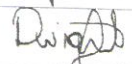
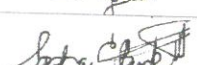
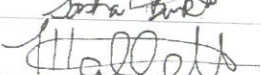
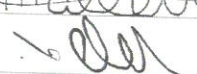
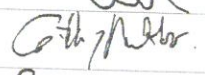
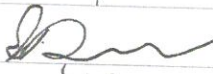
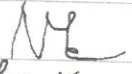
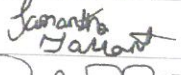
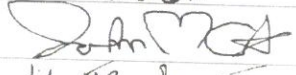

SIGNATURE	PRINT NAME	WARD	HOME EMAIL & CELL PHONE
<i>Audrey Mink</i>	Audrey Mink	6	apmink@ gmail.com 781-664-0173
<i>Craig McIskill</i>	Craig McIskill	3-1	cmciskill191@gmail.com 784-839-2387
<i>Calissa Sommer</i>	Calissa Sommer	3	Calissasommer@gmail.com 506-260-6631
<i>David Mazurek</i>	David Mazurek	1	dmazurek@upei.ca 902 916 9066
<i>Elizabeth Cyr</i>	Elizabeth Cyr	Victoria	elizabeth95cy@gmail.com 226-501-3658
<i>Stacey Dennis</i>	Stacey Dennis	Long River	Stacey Dennis & L. MacLure 616-9547
<i>Michelle McCullough</i>	Michelle McCullough	9	MichelleMcCullough56@gmail.com 902 393 5166
<i>Jeremy Powell</i>	Jeremy Powell	Back Bay	JeremyPowell@gmail.com toronto.ca

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TO THE MUNICIPAL GOVERNMENT OF CHARLOTTETOWN,

Background: In April 2019, 1 in 50 private dwellings in Charlottetown (1.93%) were listed on AirBNB making us the 2nd highest proportion among Canadian cities. Since 2016, Charlottetown has had a 200% increase in listings. Over half of those listings are for 2-3 bedroom units, and 60% of all listings have a host with multiple listings. This makes it clear that short term rentals are not just home-sharing, but an immense economic incentive to remove long-term tenants in favour of becoming a commercial property which is destabilizing our neighbourhoods. The lack of regulatory action has caused listings (and evictions) to climb rapidly and has allowed our communities to lose the neighbours that made these areas so great to visit in the first place.


We petition the Municipal Government of Charlottetown to create a by-law to restrict short-term rentals to only be operated from your principal residence – the home where you live for a minimum of 185 days a year, and is the address you use for bills, identification, taxes, etc. This allows flexibility for true home-sharing, while restricting multiple listings for commercial use.

Name	Address		Date GMT
Jaimie Trainor	86 green Charlottetown, Pei		June 19, 2019 7:10 am
Shannon McKenna	2-26 Walthen Drive Charlottetown, PE		June 18, 2019 7:26 pm
Gail Murphy	6-29 Hensley Street Charlottetown, PE		June 18, 2019 6:31 pm
Don Wright	6 Upper Hillsborough Street Apt 3D Charlottetown, PE C1A 4X4		June 18, 2019 5:35 pm
Peter Murphy	36 Rochford street Charlottetown, Prince Edward Island		June 18, 2019 5:25 pm
Grace Maclean	193 Westridge Crescent Charlottetown, PE		June 18, 2019 4:50 pm
Jennifer Keenan	Richmond st Charlottetown, Pei		June 18, 2019 4:26 pm
Halen sky	490 Queen Street Charlottetown, Prince Edward Island		June 18, 2019 4:26 pm
Jillian Hamilton	54 Glenthorn Ave Charlottetown, Prince Edward Island		June 18, 2019 4:25 pm
Dwight Cohoon	354 queen street Charlottetown, PE		June 18, 2019 2:57 pm
Sasha Burkitt	186 Belvedere Ave. Charlottetown, PE		June 18, 2019 2:42 pm
T. Hallett	Charlottetown Charlottetown, PE		June 18, 2019 1:16 pm
Brian Pollard	2 Rockcliffe Ave Charlottetown, P.E.I.		June 18, 2019 1:00 pm
Cathy Muldoon	92 Queen Elizabeth Drive Charlottetown, Pe		June 18, 2019 12:50 pm
Emily	26 Montgomery drive Charlottetown, Pe		June 18, 2019 12:28 pm
Nicole Lukeman	30 Brittany Drive Charlottetown, PE		June 18, 2019 12:20 pm
Samantha Gallant	40 Warren Grove Road Charlottetown, Prince Edward Island		June 18, 2019 11:48 am
John McMullin	111 Westridge Cr Charlottetown, PE		June 18, 2019 10:18 am
Heather Irving	124 Prince Street. Apartment #4 Charlottetown, PE		June 18, 2019 7:40 am


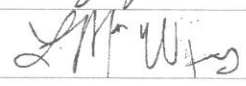
ATTACHMENT K

Robert Milligan	70 Sherwood Forest Drive Crapaud, PE	<i>Robert Milligan</i>	June 14, 2019 4:51 pm
Norma Jean Maclean	1274 Murray Harbour Murray Harbour , Prince Edward Island	<i>Norma Maclean</i>	June 14, 2019 2:14 pm
Rosalind Waters	302 North Royalty Rd. Georgetown Royalty, PEI	<i>R M Waters</i>	June 14, 2019 11:05 am
Sean Passmore	2291 Mooney Road Watervale, PEI	<i>Sean Passmore</i>	June 14, 2019 9:28 am
Jena	63 Ferry Road Cornwall , PE	<i>Jena</i>	June 14, 2019 9:02 am
Pam Martin	Pam Martin formerly Charlottetown, PE	<i>Pam Martin</i>	June 14, 2019 7:48 am
S M Jamieson	Lower montague Montague, PRINCE EDWARD ISLAND	<i>S. Jamieson</i>	June 14, 2019 7:00 am
Ramona Pal-Kovacs	19871 route 2, app 3 Hunter River, PEI	<i>Ramona Pal-Kovacs</i>	June 14, 2019 6:59 am
Corrie Gauthier	Po Box174 Murray Harbour , Pei	<i>Corrie Gauthier</i>	June 14, 2019 5:53 am
Katherine	29 Glen Stewart Drive Stratford, PE	<i>Katherine</i>	June 13, 2019 9:54 pm
Heather Jackson-Arse	972 Monaghan road lake verde, pe c1b 3l2	<i>Heather Jackson-Arse</i>	June 13, 2019 9:41 pm
Ali Skinner	2267 eastern road York, PEI	<i>Ali Skinner</i>	June 13, 2019 8:51 pm
Heather Brown	5467 Rte 13 Hunter River, Prince Edward Island	<i>Heather Brown</i>	June 13, 2019 6:35 pm
Paula White	187 Dickie Rd Borden, PE	<i>Paula White</i>	June 13, 2019 6:28 pm
Salena Croitor	9244 Commercial road murray river, pei	<i>Salena Croitor</i>	June 13, 2019 5:44 pm
Floyd Smith	RR 1 Belle River, PEI, C0A1B0	<i>Floyd Smith</i>	June 13, 2019 4:49 pm
Patricia Gaudet	343 St Nicholas Miscouche , PE	<i>Patricia Gaudet</i>	June 13, 2019 3:03 pm
Sarah MacEachern	78 Ducks Landing, Apartment 4 Stratford, PEI	<i>Sarah MacEachern</i>	June 13, 2019 2:53 pm
Norma Vass	454 Pownal Rd Rte 26 Pownal, PE	<i>Norma Vass</i>	June 13, 2019 11:27 am
Reina Lamothe	22 Kinlock RD Stratford, Prince Edward Island	<i>Reina Lamothe</i>	June 13, 2019 10:24 am
George Davies	Belfast PO Eldon, PEI	<i>George Davies</i>	June 13, 2019 7:59 am
Robyn MacDonald	125 Granville Summerside , Pei	<i>Robyn MacDonald</i>	June 13, 2019 12:36 am
Rachel McGrath	73 trans Canada highway Cornwall, PEI	<i>Rachel McGrath</i>	June 12, 2019 7:38 pm
kyle affleck	287 cherry hill rd MOUNT STEWART, PE	<i>Kyle Affleck</i>	June 12, 2019 6:18 pm

ATTACHMENT K

Taylor murphy	374 Russell street N Sarnia , Ontario		June 12, 2019 6:04 pm
Benjamin Garnhum	39 Stratford Road Stratford, Prince Edwards Island		June 12, 2019 3:23 pm
Cheri Carew	19101 Route 2 Greenvale, PE		June 12, 2019 2:06 pm
Melanie Sigsworth	10-33 Glen Stuart Dr. Stratford, PE		June 12, 2019 12:29 pm
Megan Ratchford	5 Elizabeth Crescent Stratford, PE		June 12, 2019 11:04 am
Heather Pursey	828 Brackley Pt Rd Brackley , Pe		June 12, 2019 8:03 am
Shawn Stevenson	3076 RTE 225 NORTH WILTSHIRE, PE		June 12, 2019 3:14 am
Sera St. Jean	14 Darlington Rd. North Wiltshire, Pei		June 12, 2019 12:08 am
Kyle arsenault	Arseaultkyle@hotmail.com Summerside , Pei		June 11, 2019 11:53 pm
Emma fraser	Emfraser11@gmail.com Summerside, Pei		June 11, 2019 11:51 pm
Dayz	Dayzperry19@gmail.com Summerside, Pei		June 11, 2019 11:49 pm
Veronica Palmer	40 Woodleigh Drive Kensington , PEI		June 11, 2019 10:25 pm
Shannon Coles	Cornwall Cornwall , PEI		June 11, 2019 10:20 pm
Nicolle Maund	18 Waldale Drive Mount Herbert, PE		June 11, 2019 9:17 pm
Stanley Marinov	112 sunset cres York, PE		June 11, 2019 9:03 pm
Sarah	112 sunset cres York, Pei		June 11, 2019 8:56 pm
Carlye Smith-Burke	32 Jessie Street Cornwall , Pei		June 11, 2019 8:26 pm
Marilyn Dickson	7 orchard drive Stratford, Pe		June 11, 2019 7:03 pm
A. Nicolle MacDonald	83 b Hamm's lane Bunbury, PE		June 11, 2019 6:59 pm
Lori-ann Harroun	14916 84 Ave NW Edmonton, Alberta		June 11, 2019 6:51 pm
Nicholas Gallant	1535 church road Hunter river , Pei		June 11, 2019 6:25 pm
Valerie Ward	73 Trans Canada Hwy. #1 Cornwall, PE		June 11, 2019 6:15 pm
G Hyson	9 Alexandra cry Stratford , Pei		June 11, 2019 4:59 pm
Cynthia Gay-Paquet	1966 Union Road West Covehead, PE		June 11, 2019 4:51 pm

ATTACHMENT K

Simon McNeil	21 Jssie St Cornwall , pe		June 11, 2019 4:30 pm
Leanne Wilson	10-72 Ducks Landing Stratford, PE		June 11, 2019 4:12 pm
Crissy Adams	22 Allen St North Rustico , Pei		June 11, 2019 3:40 pm
Ally Getson	76 MacArthur Drive Cornwall, PEI		June 11, 2019 3:21 pm
Eva Blaquiére	497 frederickton station rd Hunter river, Pei		June 11, 2019 2:39 pm
Taylor Zippel	998 Canavoy Road Mount Stewart , PE		June 11, 2019 2:11 pm
Stephanie Fall	84 Bonavista Ave Stratford, Pe		June 11, 2019 1:25 pm
Keri McCaffrey	105-39 ducks landing Stratford, PE		June 11, 2019 12:24 pm
April	633 48 rd Mount albion , Pei		June 11, 2019 11:59 am
Marina Pogrebnaia	124 Squire Lane Stratford, PEI		June 11, 2019 11:46 am
Ella	52 spruce lane Tignisb, Pei		June 11, 2019 10:46 am
Sara Brehaut	121 TCH Cornwall, PEI		June 11, 2019 10:43 am
Jill roberts	Covehead Covehead, Pei		June 11, 2019 9:08 am
Taliëna H	235 Stewart Point Rd Belle River, PE		June 11, 2019 8:41 am
Logan McInnis	516 Pleasant Grove Rd. York, PE		June 11, 2019 8:09 am
Sarah Donald	516 Pleasant Grove Rd. York , Prince Edward Island		June 11, 2019 8:09 am
Taya Nabuurs	26 Rodgerson Cres. Stratford, PE		June 11, 2019 7:40 am
Rhea	554 Malpeque Road Winsloe, Pe		June 11, 2019 1:39 am
Mary Kendrick	91 Heron Drive Stratford, PE		June 10, 2019 10:54 pm
Dawn Dawson	49 sandy point rd Hampton , PE		June 10, 2019 10:06 pm
Gabriel Vizcaino	9 Glen Stewart drive Stratford , Pe		June 10, 2019 9:14 pm
Lyndsay MacWilliams	694 Monaghan Rd - Rte 213 Lake Verde, Prince Edward Island		June 10, 2019 8:42 pm
Cindy MacWilliams	694 Monaghan Road, Route 213 Lake Verde, Prince Edward Island		June 10, 2019 8:39 pm
Cody MacPhail	199 Cornwall Road Cornwall, PEI		June 10, 2019 8:19 pm

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Theresa Aylward	202 SpringPark road Charlottetown , PE	Theresa Aylward	June 11, 2019 8:28 pm
Lisa Perry	248 N River Rd Charlottetown, Pe	Lisa Perry	June 11, 2019 8:14 pm
Hilary Wood	85 Richmond St Charlottetown, Prince Edward Island	Hilary Wood	June 11, 2019 7:49 pm
Catherine Muldoon	92 Queen Elizabeth Drive Charlottetown , PE	Catherine Muldoon	June 11, 2019 7:44 pm
Via Reyes	218 Euston St. Charlottetown, Prince Edward Island	Via Reyes	June 11, 2019 7:31 pm
Cathy Grant	7 Grafton Street Charlottetown , PEI	Cathy Grant	June 11, 2019 7:28 pm
Janine Maier	9 royal court Charlottetown , Pe	Janine Maier	June 11, 2019 7:27 pm
Norah Pendergast	37B Palmer's lane Charlottetown , Pe	Norah Pendergast	June 11, 2019 7:16 pm
Kevin jay	89 Norwood road Charlottetown , Pe	Kevin Jay	June 11, 2019 7:10 pm
Samantha cheverie	89 Norwood road Charlottetown, Pe	Samantha Cheverie	June 11, 2019 7:08 pm
Terran Walker	256 Kent Street Charlottetown, PEI	Terran Walker	June 11, 2019 6:56 pm
Serenity Ewart	13 Park Ave Charlottetown, PE	Serenity Ewart	June 11, 2019 6:46 pm
Kelly Robinson	209 Prince Street Charlottetown, PE	Kelly Robinson	June 11, 2019 6:45 pm
Kayleigh trainor	36 gower st Charlottetown , Pei	Kayleigh Trainor	June 11, 2019 6:36 pm
Jennifer Macintyre	14 love court Charlottetown, PE	Jennifer Macintyre	June 11, 2019 6:35 pm
Ida Embleton	198 Grafton St, Apt 204 Charlottetown, PE	Ida Embleton	June 11, 2019 6:18 pm
Grace Boyce	33 Laurie Dr Apt 9 Charlottetown, PEI	Grace Boyce	June 11, 2019 5:45 pm
Shaun Arsenaault	Charlottetown, PE	Shaun Arsenaault	June 11, 2019 5:08 pm
Kristen Chadder	82 Walthen Drive Charlottetown , PE	Kristen Chadder	June 11, 2019 5:06 pm
Caitlin Power	1-476 Queen Street Charlottetown, Pei	Caitlin Power	June 11, 2019 5:04 pm
keigha weatherby	272 University avenue Charlottetown , pei	Keigha Weatherby	June 11, 2019 5:03 pm
Brenda kennedy	435 Norwood rd Charlottetown , Pei	Brenda Kennedy	June 11, 2019 5:02 pm
Tracey Walker	256 Kent street Charlottetown , Prince Edward Island	Tracey Walker	June 11, 2019 4:47 pm
Jaclyn Borden	14 Hillsborough Street Charlottetown, PE	Jaclyn Borden	June 11, 2019 4:32 pm
Melissa	Royal Court Charlottetown , PE	Melissa	June 11, 2019 4:32 pm
Joseph dennis	34 thorndale Charlottetown, Pei	Joseph Dennis	June 11, 2019 4:20 pm
Miriam Bowen	12 Confederation Charlottetown , Pe	Miriam Bowen	June 11, 2019 4:15 pm
Amanda Rogers	219 St Peters Road Charlottetown, PEI	A. Rogers	June 11, 2019 4:15 pm


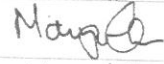
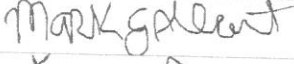
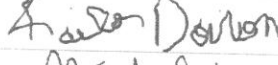
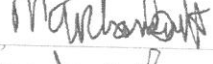
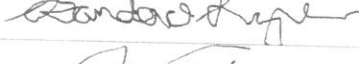

ATTACHMENT K

Aimee Holmes	33 Pine Drive Charlottetown, PE	<i>Aimee Holmes</i>	June 11, 2019 3:41 pm
Mitchell Bingley	153 Patterson Drive Charlottetown, PE	<i>Mitch</i>	June 11, 2019 3:35 pm
Ashley DeRoche	398 York Point Rd Cornwall, Pei	<i>Ashley DeRoche</i>	June 11, 2019 3:31 pm
Alyson Clow	10-55 Upper Prince Street Charlottetown, PE	<i>Alyson Clow</i>	June 11, 2019 2:52 pm
Mallory	343 Kent st Charlottetown, Pei	<i>Mallory</i>	June 11, 2019 2:27 pm
Tammy kennific	9-33 Kensington road Charlottetown, Pe	<i>Tammy</i>	June 11, 2019 2:22 pm
Douglas Gallant	2-21 MacKay Drive Charlottetown, PE	<i>Doug Gallant</i>	June 11, 2019 2:10 pm
Marissa Mosher	28 Lilac Avenue Charlottetown, PE	<i>Marissa Mosher</i>	June 11, 2019 2:09 pm
Maggie Henry	211 Fitzroy Street Charlottetown, PE	<i>Maggie Henry</i>	June 11, 2019 1:59 pm
Marie Gilchrist	307-516 North River Road Charlottetown, PEI	<i>Marie Gilchrist</i>	June 11, 2019 1:35 pm
Virginia McGowan	255 Richmond St Charlottetown, PE	<i>Virginia McGowan</i>	June 11, 2019 1:08 pm
Mel Ellis	Belfast Charlottetown, PEI	<i>Mel Ellis</i>	June 11, 2019 1:05 pm
Kaitlyn	308 Fitzroy st apt 1 Charlottetown, Pei	<i>Kaitlyn</i>	June 11, 2019 12:50 pm
Gilles Tougas	183 Hillsborough street Charlottetown, PE	<i>Gilles Tougas</i>	June 11, 2019 11:57 am
Cassidy Bruce	33 Churchill Ave Charlottetown, PE	<i>Cassidy Bruce</i>	June 11, 2019 11:56 am
Dian Miguel	171 Dorchester St Charlottetown, Prince Edward Island	<i>Dian Miguel</i>	June 11, 2019 11:55 am
Heather MacDonald	1-6 Hillsborough Street Charlottetown, PEI	<i>Heather MacDonald</i>	June 11, 2019 11:49 am
Gail Rhyno	Upper Prince St. Charlottetown, Pe	<i>Gail Rhyno</i>	June 11, 2019 11:34 am
Gisselle	22 granville Charlottetown, Pe	<i>Gisselle</i>	June 11, 2019 10:40 am
Joanna Morrison	2-308 Fitzroy St Charlottetown, PE	<i>Joanna Morrison</i>	June 11, 2019 10:32 am
Emma Matheson	39 Victory Ave Charlottetown, PE	<i>Emma Matheson</i>	June 11, 2019 9:54 am
Natalie parker	36 westridge apt 6 Charlottetown, Pe	<i>Natalie Parker</i>	June 11, 2019 9:50 am
Philip Callaghan	185 King St. Apt. 2 Charlottetown, P.E.I.	<i>Philip Callaghan</i>	June 11, 2019 9:33 am
Hannah Matheson	39 Victory Ave. Charlottetown, PE	<i>Hannah Matheson</i>	June 11, 2019 9:12 am
Peter Angus	68 Bayfield street Charlottetown, PE	<i>Peter Angus</i>	June 11, 2019 8:58 am
Jennifer White	17 West St Charlottetown, PE	<i>Jennifer White</i>	June 11, 2019 8:52 am
Frank	Charlottetown Charlottetown, Pei	<i>Frank</i>	June 11, 2019 8:03 am
Brianna Squires	235 euston street apt 6 Charlottetown, PEI	<i>Brianna Squires</i>	June 11, 2019 7:47 am

ATTACHMENT K

Nolan Phillips	2-75 Dorchester St. Charlottetown, PE	Nolan Phillips	June 11, 2019 7:29 am
Donna Trainor	265 King st Charlottetown, PEI	Donna Trainor	June 11, 2019 7:00 am
Darlene Mahar	172 Great George St, Unit A Charlottetown, PEI	Darlene Mahar	June 11, 2019 6:23 am
David Neatby	24 Water St Apt 2 Charlottetown, PE	David Neatby	June 11, 2019 2:38 am
Emily O'Brien	12B Water St Charlottetown, PE	Emily O'Brien	June 10, 2019 11:23 pm
Alexandra dalton	55a kirkwood drive Charlottetown, Pei	Alexandra dalton	June 10, 2019 10:54 pm
Kate Kinsman	2 Revell Drive Charlottetown, PE	Kate Kinsman	June 10, 2019 9:08 pm
Lori	Matters Charlottetown, PEI	Lori	June 10, 2019 9:00 pm
Christine Dickey	65 Hillsborough street Charlottetown, Pe	Christine Dickey	June 10, 2019 8:16 pm
Diane malone	Bonshaw rr#1 Charlottetown, PEI	Diane malone	June 10, 2019 7:39 pm
M. L. WHITE	81 PRINCE STREET CHARLOTTETOWN, PEI	M. L. WHITE	June 10, 2019 6:51 pm
Paige Hart	65 Hillsborough St Charlottetown, PE	Paige Hart	June 10, 2019 6:40 pm
Linda Smith	6 Hillsborough Str. Unit 5 Charlottetown, PE	Linda Smith	June 10, 2019 6:27 pm
Ray MacLeod	44 King St Charlottetown, PE	Ray MacLeod	June 10, 2019 6:16 pm
Morgan J. perry	18 Ellen's Creek Drive. Charlottetown, PE	Morgan J. perry	June 10, 2019 5:53 pm
Claire Byrne	54 Pownal Street Charlottetown, PEI	Claire Byrne	June 10, 2019 5:40 pm
Margaret Perry	153 Beach Grove Rd Charlottetown, P.E.I	Margaret Perry	June 10, 2019 4:20 pm
Dawson Paynter	15-5 belvedere Ave Charlottetown, P	Dawson Paynter	June 10, 2019 3:51 pm
Ally Hannam	1297 route 25 Charlottetown, Pei	Ally Hannam	June 10, 2019 2:56 pm
Katrina Perry	268 Sydney Street Charlottetown, Prince Edward Island	Katrina Perry	June 10, 2019 2:45 pm
Alexandra Durant	18 Cottonwood Dr Charlottetown, PE	Alexandra Durant	June 10, 2019 2:27 pm
Ainsley Kendrick	1-171 Dorchester St. Charlottetown, Prince Edward Island	Ainsley Kendrick	June 10, 2019 2:12 pm
Gabrielle Ayles	26 Vallet St. Charlottetown, PEI	Gabrielle Ayles	June 10, 2019 1:49 pm
Isaac Williams	490 Queen St. #314 Charlottetown, PE	Isaac Williams	June 10, 2019 1:49 pm
Theresa Beagan	63 Upper Hillsborough Street Charlottetown, PE	Theresa Beagan	June 10, 2019 1:18 pm
Christie Mallais	234 Richmond Street Charlottetown, PE	Christie Mallais	June 10, 2019 1:18 pm
Stacy Beagan	63 Upper Hillsborough Street Charlottetown, PE	Stacy Beagan	June 10, 2019 1:06 pm
Jennifer O'Brien	120 Brackley Point Road Charlottetown, PE	Jennifer O'Brien	June 10, 2019 1:04 pm

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Shannon Ayles	26 Valley St Charlottetown , PEI		June 10, 2019 12:52 pm
Maryrose Carson	Birchwood St. Charlottetown, PEI		June 10, 2019 12:46 pm
Mark Gallant	22 Sherwood Road Charlottetown , Prince Edward Island		June 10, 2019 11:45 am
Kaila Doiron	33 Beasley Ave Charlottetown, PE		June 10, 2019 11:42 am
Melanie Archambault	29 Upper Prince St Charlottetown, PE		June 10, 2019 11:18 am
Kandace Hagen	25 B Great George Street Charlottetown, Prince Edward Island		June 10, 2019 11:02 am
Jason Alward	2 Harbourside Access Road Charlottetown, Prince Edward Island		June 10, 2019 10:45 am

ATTACHMENT K

TO THE MUNICIPAL GOVERNMENT OF CHARLOTTETOWN,

Background: In April 2019, 1 in 50 private dwellings in Charlottetown (1.93%) were listed on AirBNB making us the 2nd highest proportion among Canadian cities. Since 2016, Charlottetown has had a 200% increase in listings. Over half of those listings are for 2-3 bedroom units, and 60% of all listings have a host with multiple listings. This makes it clear that short term rentals are not just home-sharing, but an immense economic incentive to remove long-term tenants in favour of becoming a commercial property which is destabilizing our neighbourhoods. The lack of regulatory action has caused listings (and evictions) to climb rapidly and has allowed our communities to lose the neighbours that made these areas so great to visit in the first place.

We petition the Municipal Government of Charlottetown to create a by-law to restrict short-term rentals to only be operated from your principal residence – the home where you live for a minimum of 185 days a year, and is the address you use for bills, identification, taxes, etc. This allows flexibility for true home-sharing, while restricting multiple listings for commercial use.







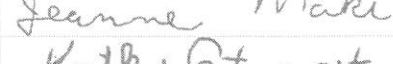
Name (please print)	Address (including postal code)	Signature
EAGAN BORE	eboire @upe.ca	
Rebecca Ford	rebecca.ford5@gmail.com	

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Entries: June 20 - October 1

Name	Address		Date GMT
Ashlyn Blacquiere	52-1 Doncaster Avenue Charlottetown, PE		September 23, 2019 4:31 pm
Kara MacRae	Point Prim Befast, pe		September 12, 2019 5:28 pm
Danny Moase	177 St Peters Rd Charlottetown, PE		September 7, 2019 9:48 am
Mike Smith	25 Prince Arthur St Amherst, NS		August 4, 2019 2:05 pm
Alyssa Laperriere	293 Glenn Dr Summerside, Pe		July 16, 2019 7:49 pm
Elayne McLaine	16-90 Pownal Street Charlottetown, PE		July 15, 2019 12:10 pm
dallas collins	po box 1108, 7 seymour drive cornwall, Prince Edward Island		July 12, 2019 7:31 pm
Robin Graham	30 Gerald street Charlottetown , PE		July 12, 2019 6:07 pm
Gregory J Robichaud	74 miah drive Cornwall, Pe		July 12, 2019 12:31 pm
Lisa MacLean	39 Kensington road apt 11 Charlottetown , PE		July 12, 2019 11:08 am
Tara Hencher	109 Lawndale Court Charlottetown, Pe		July 12, 2019 11:00 am
Sharlene MacLean	12 Ambrose Street Charlottetown , Prince Edward Island		July 11, 2019 4:57 pm
Regena Kaye Russell	271 Euston Street Charlottetown, PEI		July 11, 2019 3:38 pm
Kelly Rayner	1100 Brackley Point Road Harrington, PE		July 11, 2019 3:33 pm
Linda Wigmore	218 University Avenue, c/o My Plum My Duck Charlottetown, PE		July 11, 2019 2:39 pm
Jeanne Maki	90 Glenethorn Ave. Charlottetown, Prince Edward Island		July 11, 2019 12:45 pm
Kathy Stewart	50 Prince Street Charlottetown, PEI		July 11, 2019 5:04 am
Rebecca Keough	89 Darby drive Summerside, Pe		July 10, 2019 8:44 pm

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Lou Richard	367 Kent st Charlottetown , PE		June 18, 2019 7:31 am
Natasha Fisher	3-8 Longworth Ave Charlottetown, Pe		June 18, 2019 12:17 am
Mike MacDonald	45 Ash Drive Charlottetown, PE		June 18, 2019 12:12 am
Indra Johnson	21 prince st Charlottetown, Pe		June 17, 2019 11:10 pm
Robert McSweeney	85 Hillsborough street Charlottetown, PE		June 17, 2019 10:30 pm
Debbie Mutch	211 water street Charlottetown , PEI		June 17, 2019 9:40 pm
Cheryl Feehan	21 Brookdale Drive Charlottetown, Pe		June 17, 2019 9:14 pm
Mark Hodge	2-294 Sydney street Charlottetown, PE		June 17, 2019 8:44 pm
Catherine MacDonald	5-20 Maypoint Rd Charlottetown, PE		June 17, 2019 8:26 pm
Cody Murtagh	10 Duncan Heights Charlottetown , PE		June 17, 2019 8:18 pm
Brittany macdonald	10 Duncan heights Charlottetown , Pe		June 17, 2019 8:13 pm
Katelyn Dewar	22 Pownal St Apt 2 Charlottetown , PE		June 17, 2019 10:50 am
David nicole	78 churchill Charlottetown, Pe		June 16, 2019 10:19 am
Maureen Gallant	42 Emerald Dr Charlottetown, PE		June 14, 2019 6:33 pm
Russell Louder	271 Euston Street Charlottetown, PE		June 14, 2019 2:58 pm
Fierah Livingstone	120 Walthen Drive Charlottetown, PE		June 14, 2019 11:08 am
Kimberly Davey	27 Trafalgar street Charlottetown, Pe		June 14, 2019 10:47 am
Andy Glydon	17 Upper Prince St Charlottetown, PE		June 14, 2019 10:25 am
Brice MacLean	118 Maypoint Rd Apt 5 Charlottetown, PEI		June 14, 2019 8:16 am
Wendy Druet	98 upper Hillsborough Street Charlottetown , PEI		June 14, 2019 8:04 am
Judith MacNeil	5G Browns Court Charlottetown, PE		June 14, 2019 7:19 am
Just Smith	Pond St Charlottetown , PEI		June 14, 2019 7:17 am
Amanda Gibbs	565 Queen St. Charlottetown, Pei		June 14, 2019 7:03 am
Gillian Nichol	47 Bridle Path Lane Charlottetown, PEI		June 14, 2019 2:51 am
Elayne McLaine	16-90 Pownal Street Charlottetown, PE		June 13, 2019 11:47 pm
Kate Publicover	29 Andrews Court Charlottetown, PE		June 13, 2019 9:44 pm
Jessica McCann	49 Burns Ave Charlottetown, PE		June 13, 2019 9:33 pm
Andrew Garnhum	521 Malpeque Rd apt 202 Charlottetown, PE		June 13, 2019 6:35 pm

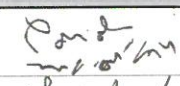
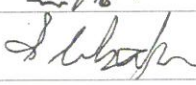
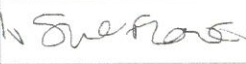
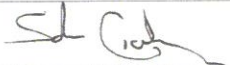
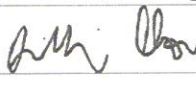
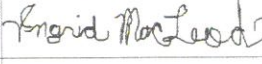
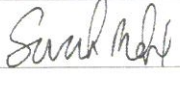

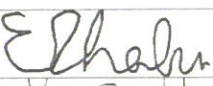
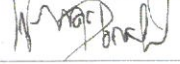

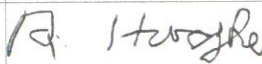
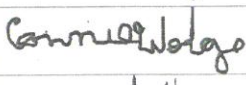

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Samantha clow	6 Elizabeth crescent Stratford, P. E.I.		June 29, 2019 1:46 am
Brad Deighan	7 Carmichael Drive Sherwood, PE		June 27, 2019 7:45 pm
nancy Riley	97 edward st charlottetown , pe		June 27, 2019 6:19 pm
Jane Pitre	Dale Drive Summerside, PEI		June 27, 2019 4:25 pm
erika milburn	148 mcsweeney ave moncton, nb		June 27, 2019 4:12 pm
Erin Riley-MacFadyen	97 Edward street Charlottetown , Pe		June 27, 2019 3:49 pm
Michelle Blanchard	494 Lower Malpeque Rd. Charlottetown, PE		June 27, 2019 3:31 pm
Lauren Timmons	31 Rankin Court Charlottetown, PE		June 27, 2019 12:28 pm
Pan Wendtd	83 Upper Prince St., Apt. 1 Charlottetown, PEI		June 27, 2019 12:09 pm
Amber	339 Myrtle st Summerside , PEI		June 26, 2019 12:09 pm
Angela Knockwood	258 Fitzroy Street Charlottetown, PEI		June 26, 2019 11:11 am
Paulette M Halupa	348 Myrtle St Summerside, Prince Edward Island		June 25, 2019 6:28 pm

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Name	Address		Date GMT
Carol Mccarthy-butler	77 east river drive Stratford , PEI		June 18, 2019 7:50 pm
Sara Whalen	4497 Portage Rd Unit 2 Oyster Bed Bridge, Prince Edward Island		June 18, 2019 6:03 pm
Sue Flower	Cumberland Cumberland , Pe		June 18, 2019 1:32 pm
Lena Croitor	9244 Commercial road Murray River, Prince Edward Island		June 18, 2019 1:21 pm
Jillian Clow	1294 Long River Road Kensington, Prince Edward Island		June 18, 2019 10:45 am
Ingrid MacLeod	310 Red Point Road Johnstons River, C1B3K9		June 18, 2019 9:59 am
Alan & Heather Hale	#2874 Trans Canada Highway Belle River, PE	ALAN/HEATHER HALE	June 18, 2019 9:53 am
Sarah Mehl	4367 Rt 13 Hunter River, PE		June 18, 2019 9:20 am
Virginia Kopachevsky	Box 24021 Stratford , PE		June 18, 2019 7:02 am
Emilia Phalen	158 Cameron rd New haven, PE		June 18, 2019 6:41 am
Venessa MacDonald	377 french village road savage harbour, PEI		June 17, 2019 10:14 pm
Roxanne Llewellyn	368 Burnt Point Road Georgetown, PE		June 17, 2019 9:10 pm
Ross Hughes	20 MacDonald Road Stratford, Prince Edward Island		June 17, 2019 7:03 pm
Connie Wedge	2239 Center Line Rd. Elmsdale, PE		June 15, 2019 7:51 pm
Veronica Jendrick	52 Heritage Dr Cornwall, Prince Edward Island		June 15, 2019 4:41 pm

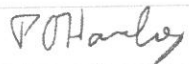



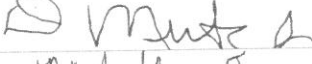
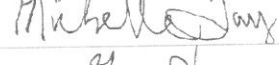
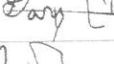
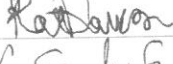
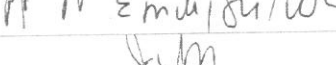

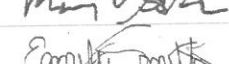
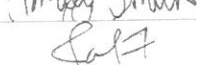

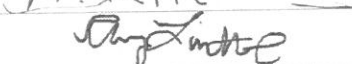
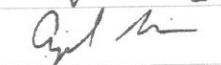


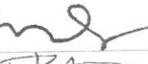
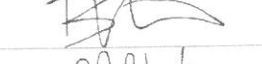



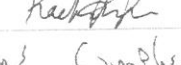

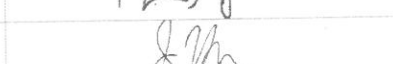
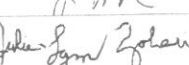


ATTACHMENT K

Michelle LaBobe	433 Norwood Rd Charlottetown, PE		July 10, 2019 6:28 pm
Debbie Carruthers	242 Mill Rd. Breadalbane, Prince Edward Island		July 10, 2019 4:39 pm
Penny Wheelhouse	83 Kensington road Charlottetown, PE		July 10, 2019 4:35 pm
Selena Benoit	4992 Nine Mile Creek Rte 19 Cornwall, Pei		July 10, 2019 2:17 pm
Linda Smith	5 - 6 Hillsborough St. Charlottetown, PE		July 10, 2019 12:52 pm
Linda Shaw	106-409 Queen Street Charlottetown, PEI		July 10, 2019 11:16 am
Heather Pursey	828 Brackley Pt Rd Brackley, PE, Prince Edward Island		July 10, 2019 10:25 am
Terrisa Lynch	531G university avenue Charlottetown, PE		July 10, 2019 7:40 am
Aundrea M	Stratford Stratford, PE		July 10, 2019 6:18 am
G. Schoenfeldt	12 Grandview Stratford, PE		July 10, 2019 12:50 am
Kathy Miller	7283 St.Peters Hwy Morell RR1, PE		July 9, 2019 11:48 pm
April Mydean	35 Oak Drive Charlottetown, PE		July 9, 2019 11:32 pm
Krista Collins	10 Mackinley Crst Cornwall, PE		July 9, 2019 10:58 pm
Ivy Inkpen	33 Greenwood dr, Apt1 Summerside, Pei		July 9, 2019 10:55 pm
Louise Lalonde	23 Granville St. Charlottetown, PE		July 9, 2019 10:45 pm
Diana Carver	67 Autumn st Summerside, PE		July 9, 2019 9:42 pm
Pam Martin	42 Huron St (formerly 432 Queen, PEI) Deep River, ON		July 9, 2019 9:17 pm
Aaron Brown	10 Howard Dr Cornwall, PEI		July 9, 2019 8:57 pm
Jillian Epping	131 North River Rd. Charlottetown, PE		July 9, 2019 8:23 pm
David Neatby	24 Water St, apt 2 Charlottetown, PE		July 9, 2019 8:00 pm
Keri Deveaux	9 Nightingale Drive Stratford, PEI		July 9, 2019 3:53 pm
Andy Glydon	17 Upper Prince STREET, 1 Charlottetown, PE		July 9, 2019 3:43 pm
Traci Mayhew	22 Sherwood Road Charlottetown, Prince Edward Island		July 9, 2019 3:41 pm
Kim Walsh	65E burns ave Charlottetown, PE		July 9, 2019 2:44 pm
Katherine Elsinga	1061 Wigmore Kensington, PEI		July 7, 2019 5:57 pm
Dian curry	32 McQuaid court Summerside, Pei		July 6, 2019 1:54 pm
Erika Morey	A-300 Brock Ave Toronto, ON		July 3, 2019 4:46 pm
Monica Lacey	295 Fitzroy st Charlottetown, PEI		June 30, 2019 11:00 pm





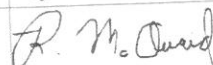
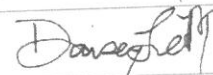
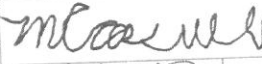


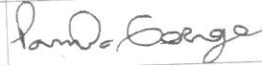
ATTACHMENT K

Stephanie	Euston st Charlottetown , Pe	S Mac	June 13, 2019 6:33 pm
Heather MacWilliam	15 St. Pius X Avenue Charlottetown, PE	H MacWilliam	June 13, 2019 5:39 pm
Stephen MacInnis	107 Gerald Street Charlottetown, PEI	Step Mac	June 13, 2019 4:20 pm
Colin Farrell	102 Brighton Rd Charlottetown , Prince Edward Island	Col Farrell	June 13, 2019 1:40 pm
Bonnie MacLeod	84 DAWN DR charlottetown, PE	Bonnie MacLeod	June 13, 2019 1:38 pm
Ann Braithwaite	8 Ridgemount Court Charlottetown, PE	Ann Braithwaite	June 13, 2019 11:23 am
Nikki Stewart	26 doncaster ave Charlottetown, PE	Nikki Stewart	June 13, 2019 10:47 am
Samantha myself	15 Chestnut Street Ch'town, PE	Samantha Quirke	June 13, 2019 9:56 am
Aimee Power	40 Euston Street Charlottetown, PE	Aimee Power	June 13, 2019 9:47 am
Mark Hodge	2-294 sydney street Charlottetown, PE	Mark Hodge	June 13, 2019 9:08 am
Dorothy Dedman	20 Duvar Ct. Charlottetown , PE	Dorothy Dedman	June 13, 2019 9:05 am
Deanna Mackenzie	298 Richmond street Charlottetown, PE	Deanna Mackenzie	June 13, 2019 7:27 am
Alan macmillan	70 Longworth avenue Charlottetown, Pe	Al MacMillan	June 13, 2019 7:18 am
Rhonda Gallant	18 Selkirk crescent Charlottetown , PEI	R. Gallant	June 13, 2019 7:14 am
Jessica Reddin	43 York Lane Charlottetown , Pe	Jessica Reddin	June 13, 2019 6:59 am
Dean Campbell	2222 Horne cross rd Charlottetown, Prince Edward Island	Dean Campbell	June 13, 2019 6:51 am
Sarah	358 Queen street Charlottetown Queens County, PE	Sarah	June 13, 2019 1:48 am
Wynter Arsenault	31 Corrigan court Charlottetown, PE	Wynter Arsenault	June 12, 2019 11:37 pm
Oliver Ferns	17 MacAusland Dr Charlottetown , PE	Oliver Ferns	June 12, 2019 11:17 pm
Alanna Manning	27 Spring Street Charlottetown, PE	Alanna Manning	June 12, 2019 11:04 pm
Cassie McPhee	5-554 Malpeque Road Charlottetown, Pe	Cassie McPhee	June 12, 2019 10:35 pm
Jacqui Chaisson	2-29 Valley Street Charlottetown , PE	Jacqui Chaisson	June 12, 2019 9:07 pm
Joel Enman	72 east royalty rd Charlottetown, PE	Joel Enman	June 12, 2019 8:26 pm
Kandace Matthews	514 Malpeque RD Charlottetown, PEI	Kandace	June 12, 2019 7:18 pm
Will Trenholm	17 greenleaf Charlottetown, Pei	Will Trenholm	June 12, 2019 6:35 pm
Stephanie Gay	67 Parent Street Charlottetown, PE	Stephanie Gay	June 12, 2019 5:53 pm
Carol Doyle	10 Parent Street Charlottetown , PE	Carol Doyle	June 12, 2019 5:25 pm
Kevin Mayne	91 king street Charlottetown , Pe	Kevin Mayne	June 12, 2019 5:22 pm

ATTACHMENT K

Patrick O'Hanley	476 Queen St Charlottetown, PE		June 12, 2019 5:12 pm
Afrim	15 falconwood dr Charlottetown, PE		June 12, 2019 4:55 pm
Breagh Chapman	12 Passmore St Charlottetown, PE		June 12, 2019 4:55 pm
John	33 Kensington red Charlottetown, PE		June 12, 2019 4:54 pm
Debbie Mutch	211 water st Charlottetown, PE		June 12, 2019 4:41 pm
Michelle Jay	150 Mount Edward Road Charlottetown, PE		June 12, 2019 4:06 pm
Gary Cheverie	48 Weymouth st Charlottetown, P.E.I		June 12, 2019 3:36 pm
Katie Dawson	1-76 Euston Street Charlottetown, PE		June 12, 2019 2:16 pm
Emily sullivan	7 Goodwill Ave Charlottetown, PE		June 12, 2019 12:34 pm
Jordan MacKinnon	343 Kent alt 203 Charlottetown, Pei		June 12, 2019 12:09 pm
Marc DesRoches	195 Cumberland St Charlottetown, PE		June 12, 2019 11:58 am
Emily Smith	135 fitzroy street Apt 3, Ch'town/PE/Canada		June 12, 2019 11:33 am
Jocelyn Fraser	70 Bayfield St Charlottetown, Pe		June 12, 2019 10:59 am
Alexia Riche	12B browns Court Charlottetown, PEI		June 12, 2019 10:41 am
Amy Linthorne	28-1 Great George Street Charlottetown, PE		June 12, 2019 9:42 am
April Morrison	23 MacAusland drive Charlottetown, PE		June 12, 2019 9:29 am
Krista Cousins	183 euston street, unit 2 Charlottetown, Pe		June 12, 2019 9:26 am
Kristy Phillips	7 Gay Avenue Charlottetown, PEI		June 12, 2019 8:36 am
Megan Stewart	75 Hillsborough Street Charlottetown, PE		June 12, 2019 8:22 am
Rebecca Viau	60 summer street Charlottetown, PE		June 12, 2019 8:14 am
Natalie Hunt	5 Johnson Ave Charlottetown, PE		June 12, 2019 2:41 am
Sheena Ferns	17 MacAusland Drive Charlottetown, Pe		June 11, 2019 11:02 pm
Penny Wheelhouse	83 Kensington road Charlottetown, PE		June 11, 2019 10:45 pm
Kachina Peterson	43 ash dr Charlottetown, PE		June 11, 2019 10:20 pm
Dianne Campbell	105 Hillsboro Street Charlottetown, PE		June 11, 2019 10:15 pm
Teresa Doyle	56 green st Charlottetown, PEI		June 11, 2019 9:43 pm
Jasmine Michel	86 McGill Ave Charlottetown, PE		June 11, 2019 9:43 pm
Julie-Lynn Zahavich	183 Euston Street Charlottetown, Prince Edward Island		June 11, 2019 9:01 pm

ATTACHMENT K

Faye Bryenton	65 Broadway Street Kensington, PE		June 10, 2019 7:07 pm
Krista MacEachern	69 Halliday Road Eldon, PE		June 10, 2019 6:45 pm
Bill	Kendrick Stratford, OE		June 10, 2019 6:21 pm
Dwayne Robbie	157 Cameron Road New Haven, PE		June 10, 2019 5:28 pm
Rebecca McQuaid	16 Bellevue Road Stratford, PE		June 10, 2019 5:07 pm
Daisey-Lee MacDonald	1433 Canavoy Rd Mount Stewart, PE		June 10, 2019 4:41 pm
Matthew Alan Craswell	30 Lakeview Dr Cornwall, PE		June 10, 2019 3:44 pm
Jill MacIntyre	320 Convent Street Summerside, PEI		June 10, 2019 2:51 pm
Shawna M MacAusland	5-70 Stratford Rd Stratford, PE		June 10, 2019 11:48 am
Pamela George	162 Hanover st Summerside, Prince Edward Island		June 10, 2019 11:31 am

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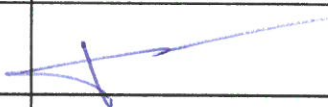
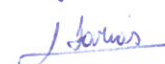
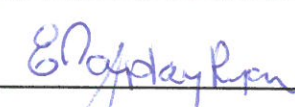
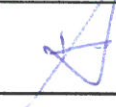

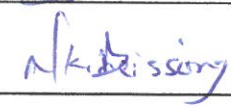
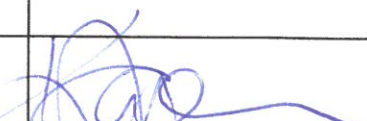
Name (please print)	Address (including postal code)	Signature
Ellen Locke Doiron	803 Crabbe Road Springvale, PE C1E 0L7	Ellen Locke Doiron
Bernie Gallant	17 Doncaster Ave. CH TOWN C1A 7X7	Bernie Gallant
Caroline Bouche	7C Browns Court Charlottetown PE C1A 9M7	Caroline Bouche
Sarah McCabe		Sarah McCabe
Hayley Leclair		Hayley Leclair
Amelia Jenkins	9 battery point, Stratford PE, C1B 2L5	Amelia Jenkins
Kellie Deacon	219 St Peters Road Charlottetown	K. Deacon
Chloe Benoit	24 Baxter Lane West Covehead	CBenoit
Jidney Asman	Stratford C1B 1T3	J Asman

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Name (please print)	Address (including postal code)	Signature
Marian White	44 Ambrose St	
Lissia Oliveira	75 Cumberland St	
Elise Tapley Ryan	C0A2B0	
Paula Flores	10 Doc Blonchard Cres	
Marilyn Sparling	598 City View Dr ^{Merrwood}	
David Chukwaka	33 Kensington Rd	
Nkine Bissang	201 Kleymouth Road	
KARIE		
KAZRIF JAHN	56 Green St C1A 4H3	

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Name (please print)	Address (including postal code)	Signature
Kate Attkins	23 Raspberry Ave Ch-town C1E0B4	K Attkins
Olivia Lannigan	620 Wood Islands Road, Montague C0A1R0	Olannigan
Hailey Pineau	31 Summer St. North Rustico C0A1X0	H Pineau
Hollie Campbell	36 Bonnie Blink Dr Ch-town PE C1C1K2	Hollie Campbell
Natasha Parker	34 Woodward dr Apt. 3 ChTown C1C1S3	Natasha Parker
Irma Sanicola	754 Crabbe Rd C1E0C8	Irma Sanicola

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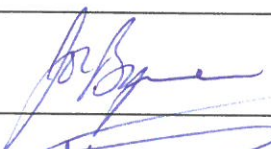
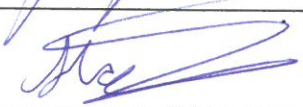

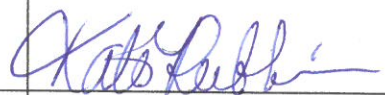
Name (please print)	Address (including postal code)	Signature
Katelyn Dewar	22-2 Pownall St. Charlottetown PE C1A3V8	Katelyn Dewar
Susan MacLeod	20-5 Pownall St Ch'town PE C1A3V8	Susan MacLeod
Katie-Su Gaudet	20 Glen Stewart Dr. Stratford PE C1B2Y3	Katie-Su Gaudet
Emily Gaudet	3 MacIntyre Drive Ch'town, PE, C1A 9R3	Emily Gaudet

ATTACHMENT K

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Name (please print)	Address (including postal code)	Signature
JOE BYRNE	54 POWELL CHARLOTTETOWN, PE C1A 3W3	
Shannon Courtney	10 Beach St Charlottetown, PE C1A 5G5	
Donna Sutton	57 Dorchester St	
Kate Publicover	29 Andrews CRT C1C 1B2	

ATTACHMENT K

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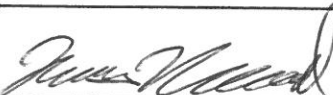
Name (please print)	Address (including postal code)	Signature
MARILYN J. GARY	39 CORRIGAN CT	Marilyn Gary
Dawn Hunt	Bicam's House	Dawn Hunt
EARL DICKS	Bedford	Earl Dicks

By signing I authorize my name being made public in supporting this petition.

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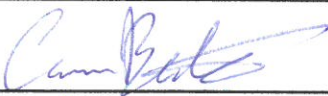
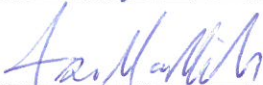

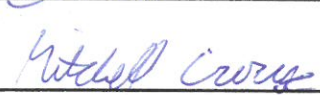


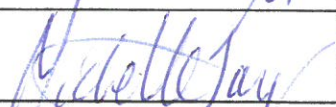


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Name (please print)	Address (including postal code)	Signature
James Mallard	2-239 Cumberland St. Charlottetown, PE C1A 5C8	

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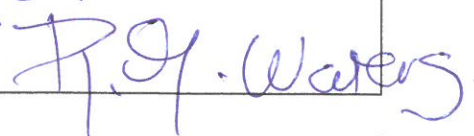
Name (please print)	Address (including postal code)	Signature
Colby Beaton	3665 Launching Rd COA 1G0	
Asia MacMillan	14338 St. Peters Rd C1C-ONS	
Emily Foster	44 Pownall St. Ch'town C1A 3V9	
Mitchell Crouse	10 North St. Ch'town C1E 1V4	
Julia Hartley	92 Walther Dr. Charlottetown C1A 4T9	
Megan Macdonald	43 Glencove Dr. Stratford	
MICHELLE JAY	150 Mt. Edward Rd. Ch'town, PEI	
Jordan Boder	230 Fitzroy St Ch'town C1A 1S7	
Alex Buffett	204 Mason Rd C1B 2E9 Stratford	

ATTACHMENT K

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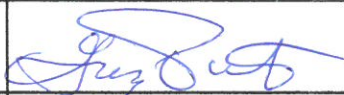
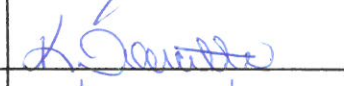


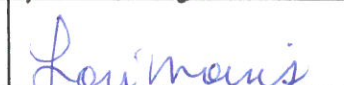
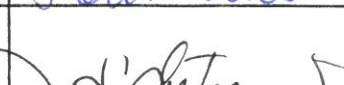
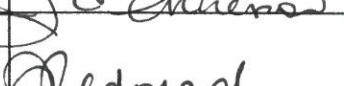
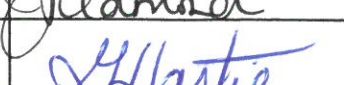
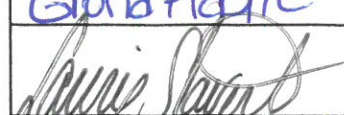
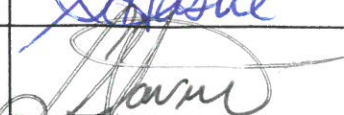
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Name (please print)	Address (including postal code)	Signature
Vladimir Zakorodnyy	35 COTTISAN CRT Charlottetown PE	
BRIAN GILLIS	71 GREENFIELD AVE CHARLOTTETOWN PE	
Taya Nabours	26 Rodgerson Cres. Stratford, PE	
Jennifer O'Brien	120 A Brackley Pt. Road	
Bethany Collicutt	98 Maple Ave, Ch. town	
BARBARA DYLLA	127 Walthen Dr. CH. TOWN C1A 4V4	
Anna Shady		
Laurak Bird	19 Pleasant St.	
Rosalind Waters	302 North Regency Rd. Georgetown COA 1L0	

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Name (please print)	Address (including postal code)	Signature
GREG PETRIS	59 EDWARD CHASEZ	
Arthur Doreille	East Brimley	
Rodney CUDMORE	Charlottetown	
PAULA WATTS	YORK COAST	
Lori Morris	Covehead COAST	
Jeanne d'Entremont	Charlottetown, C1E1N8	
Jenn Redmond	Murmaid PEI C1B4P9	
Gloria Hastie	Brackley Beach, PEI C1E2W1	
	Nest Covehead PE	

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Name (please print)	Address (including postal code)	Signature
Breanna Marsolais	14 Eden Street C1A 4S1	Breanna Marsolais
J. Canfell	23 Westwood Crescent C1A 8X4	J. Canfell
Mary Beth Campbell	94 Queen Street, Charlottetown	Mary Beth Campbell
Dawn Courtney	74 Wilson Road	Dawn Courtney
Tracey Gilbert	23 Prince Street	Tracey Gilbert
Megan Clancey	67 McGill C1A 2J9	Megan Clancey
Jennifer O'Brien	Charlottetown, PE	J. O'Brien
Kate Larson	22 Nottingham Ave	Kate Larson
James Pinaud	Benavista St. John's	James Pinaud

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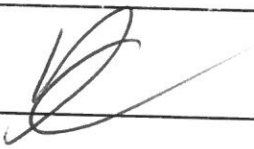
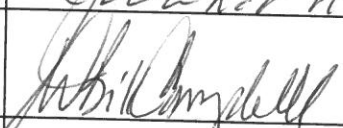
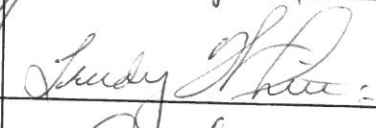
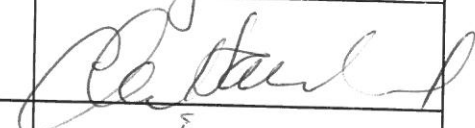
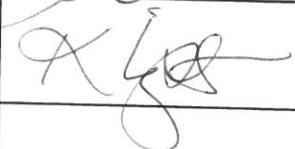


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Name (please print)	Address (including postal code)	Signature
Sara Munnaghan	136 Stratford Rd C1B 1Y4	Sara Munnaghan
Kelly Campbell	591 South Montague Rd COA LRO	Kelly Campbell
Linsey Sabarin	90 Heron Stratford C1B 2B4	Linsey Sabarin
Catherine Mullally	183 Mt. Edward Charlottetown E1A 5T1	Catherine Mullally
Terra Gordon	14 Macinnis Rd, Auster	Terra Gordon
Robyn Schwartz	101 MacEachern Rd, Long Creek	Robyn Schwartz
Margaret Bradley	30 Campbell Rd.	Margaret Bradley
Nelise MacDonald	54 Kirk Ave Charlottetown	Nelise MacDonald
Be Poon	59 EDWARD	Be Poon

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Name (please print)	Address (including postal code)	Signature
Daniel Cousins	61 H Burns Ave Charlottetown PE C1E2G5	
Eleanor Kelly	304 FITZGERALD ST CHAR-IT	Eleanor Kelly
J.W. Bill Campbell	259 QUEEN STREET Charlottetown PE C1A4B9	
Trudy White	1489 Pleasant Valley Rd. Murray River, PE C0A1W0	
Ole Hammarlund	252 Prince St.	
Karen Lips	250 Prince St	
Kels Smith	59 Nottingham Dr Stratford C1B1S8 PE	
Patrick Sullivan	7 Lap Thorne Ave Charlottetown C1A2M3 PE	
Ryan Bulger	Ryan Bulger	

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Name (please print)	Address (including postal code)	Signature
Jeanne Maki	90 Glenora C/A 9B5	Jeanne Maki
Melissa Munro-Bernard	8 Princess Crescent Charlottetown C/A 7Z8	M. Munro-Bernard
Dee Duffy	29 Salmen Tr	Dee Duffy
Doreen Dingell	5 Belvedere Ave	Doreen Dingell
Janet Deacon	69 Upper Prince St	Janet Deacon
Doreen Robbie	157 Cameron Road NEW HAVEN, CT 06453	Doreen Robbie
Doreen Robbie	157 Cameron Road NEW HAVEN, CT 06453	Doreen Robbie
Kathleen McNeill	1-315 Norwood Rd, Charlottetown, PE, C1A 9K2	Kathleen McNeill
Dave Cozens	1-315 Norwood Rd, Charlottetown C/A 9K2	Dave Cozens

What about Great George buying up whole blocks?

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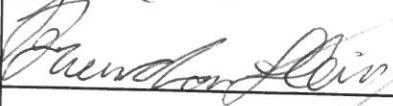



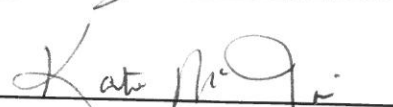
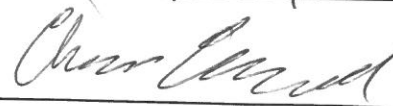
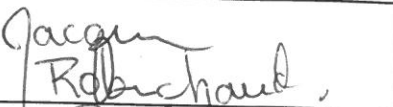

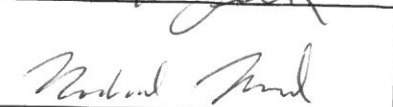
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Name (please print)	Address (including postal code)	Signature
Mary Lou Bassett	29 Hunter Lane C1A 9K9	Mary Lou Bassett
Debbie MacRae	120 OAK DR. C1A 7K2	Debbie MacRae
BILL EYRE	55 WATER ST. C1A 1A3	BILL EYRE
Mikayla Richard	32 Northridge C1C 1A1	Mikayla Richard
Emily Simon	35 Lilac Ave C1A 6L5	Emily Simon
SHADAE BEALE	238 GRAPTON STREET C1A 1K5	Shadæ Beale
Carla Young	106 Bonavista Ave C1B 0E7	Carla Young
Brenda Talbot	386 Queen St.	Brenda Talbot
Timothy	88 Smith St	Timothy

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Name (please print)	Address (including postal code)	Signature
Dave Atkinson	21 Summer St.	
Brendan Flannery	4 Russell Drive C1E1B6	
PARICK S PERIER	BRACKLEY C1E1G6	
Jason Alward	2 Harbourside Access Rd C1A 8R4	
Brittany Cormier	16 Braun Court C1A 9H3	
KATIE Mc Innis	4 Sunnyside Dr. C1B 1Z8 Malguere	
Chayne Chappell	1052 Valleyfield Rd C0A 1R0 Ch'town PE	
Jacque Robichaud	59 Corrigan Crt C1A-8N5	
Paul Morgan		
Nouhad Mawad	74 Highland ave, C'town PE C1H 2H6	

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Name (please print)	Address (including postal code)	Signature
Jean Bowley	44 POWNALL ST	Jean Bowley
Eileen Conboy	352 Queen St., Ch'town	Eileen Conboy
Allison Kelly	87 Water St.	Alli Kelly
LEO GARLAND	48 GRAFTON ST.	Leo Garland
Phil Callaghan	185 King St. Apt. 2	Phil Callaghan
Ellie Trunn	114 Queen St.	Ellie Trunn
Josie Baker	378 QUEEN ST C1A1E3	Josie Baker
Jonathan Green	8 Grafton St. Apt. 1 C1A1K4	Jonathan Green
Joe Anne Callaghan	371 Kent St C1A1P7	Joe Anne Callaghan
Jason Hogan	65A Burns Ave	Jason Hogan

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Name (please print)	Address (including postal code)	Signature
Shawn Murphy	24 Berkeley Charlottetown PEI C1A 2X5	902-892 7714
Rosie LeFaire	29 Villa Ave C1A2A8 Charlottetown	Rosie LeFaire
Kristy McKinnon	268 Sydney Street C1A 1H2 Charlottetown	Kristy McKinnon
ALLAN SONIER	19 South Drive S5S1E C1A 3Y6	ALLAN SONIER
Eileen McShane	24 Haveland apt 310	Eileen McShane
Erin Riley-MacFadyen	97 Edward St.	Erin Riley-MacFadyen
Shannon Ayles	26 Valley St	Shannon Ayles
Ellen Gormley	14 Barrymore Court	Ellen Gormley
Daniel Boudreau	14 Herwood Cir Charlottetown PE C1E1Z8	Daniel Boudreau

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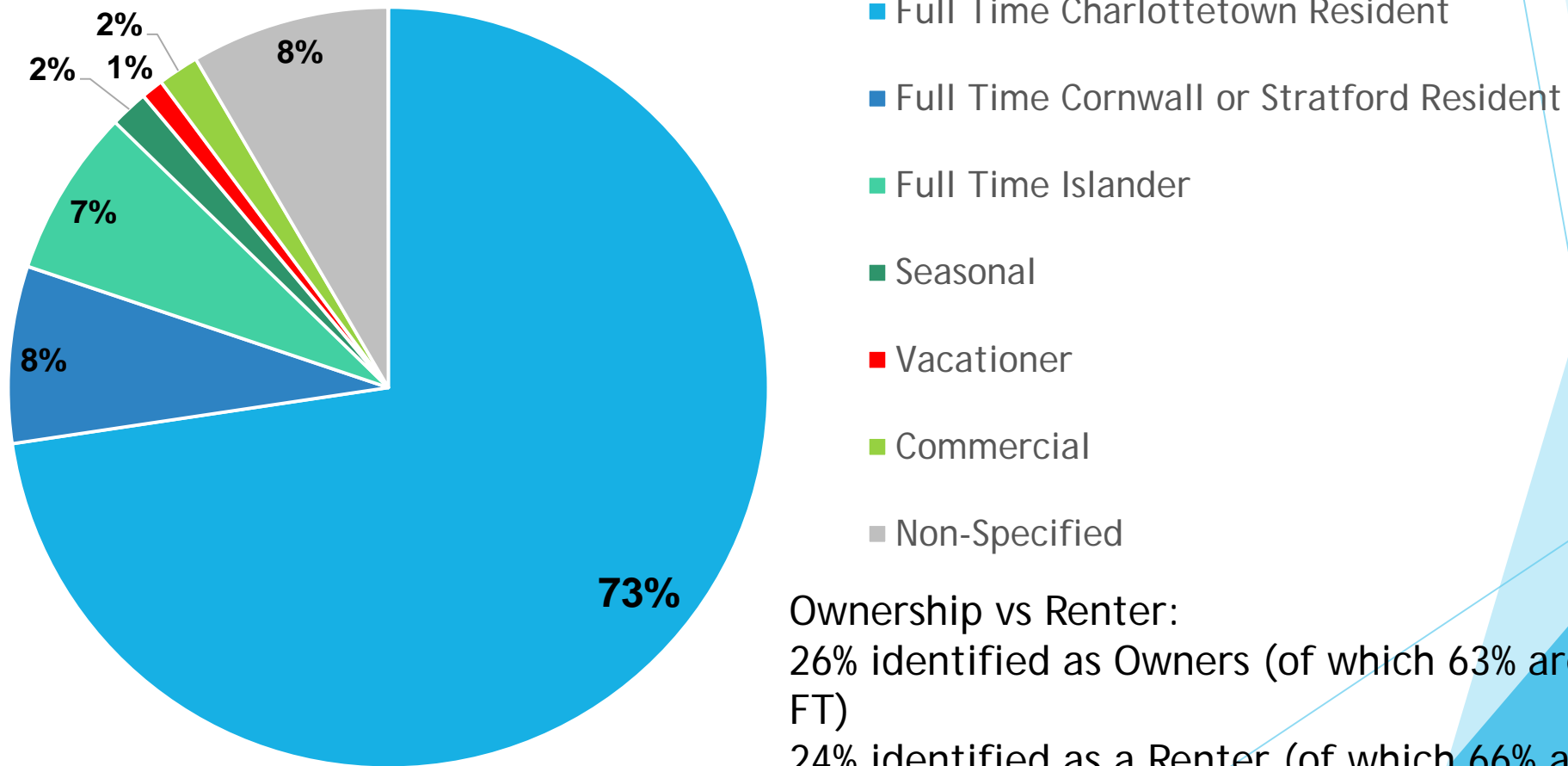
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Name (please print)	Address (including postal code)	Signature
Lynne Thiele	Stratford. 1 Scantlebury Lane C1B1M8	Lynne Thiele
Tristan Gray	17 Orlebar street C1A 4X5	Tristan Gray
Sarah Dennis	" "	Sarah Dennis
Roxie Shaw	169 Dorchester St. C1A 1E4 Charlottetown, PE	Roxie Shaw
Raymundo Lu	39 Corrigan Ct Ch'town, PE C1A 8N5	Raymundo Lu
James Power	67 Parkview Dr. Ch'town C1A 5X4	James Power
Mall Stanley	40 Euston C1A 1V8	Mall Stanley
Nova Arsenault	44 Douglas St. C1A2J2	Nova Arsenault
Simon Derome	188 Prince St. #101 C1A 4R9	Simon Derome

Attachment L

Charlottetown STR Survey – Who responded?



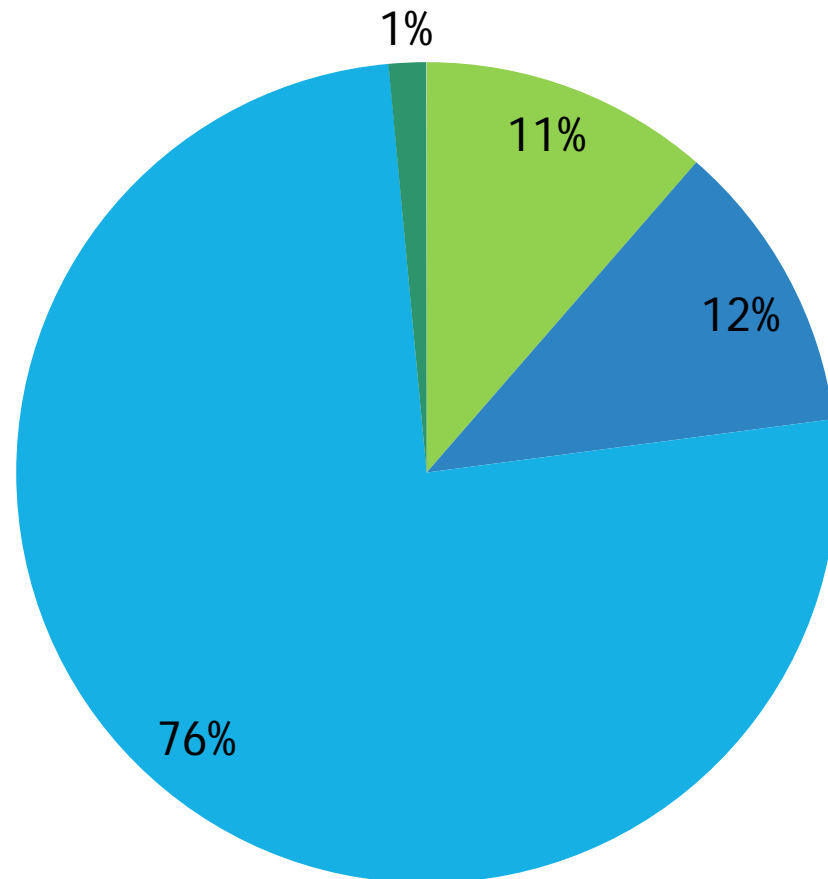
Ownership vs Renter:

26% identified as Owners (of which 63% are FT)

24% identified as a Renter (of which 66% are FT)

Attachment L

Have you ever advertised your dwelling/home as a short term rental?



■ Yes

■ No, but considering it

■ No, I don't plan on it

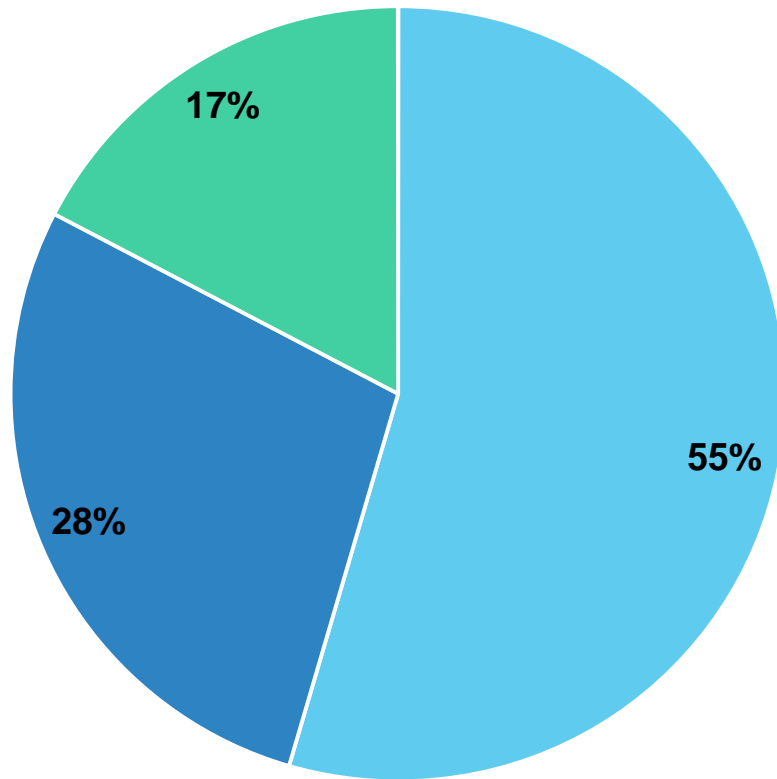
■ Didn't respond

Seasonal Residents (64%) and Commercial Respondents (54%) were most likely to respond Yes.

Renters (94%) were most likely to respond NO, I don't plan on it.

Attachment L

Do you support time limits on short term rentals?



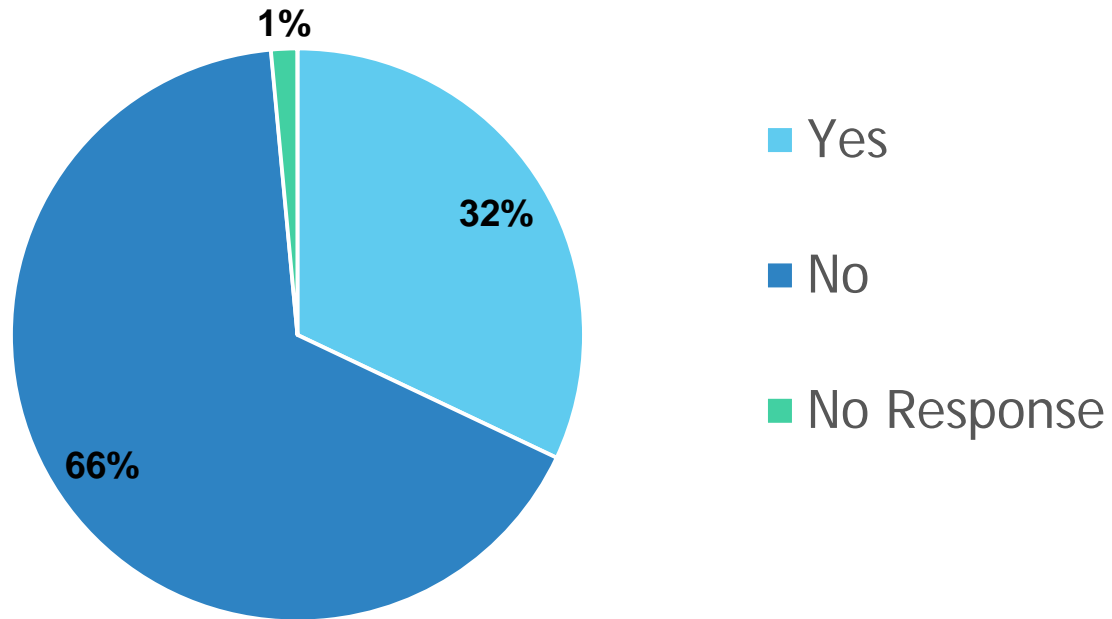
- No (Annual)
- Yes (Seasonal)
- Did not respond

"Seasonal short term rentals means that renters have to move in order for tourists to have a convenient place to stay. It is detrimental to the health of our communities."

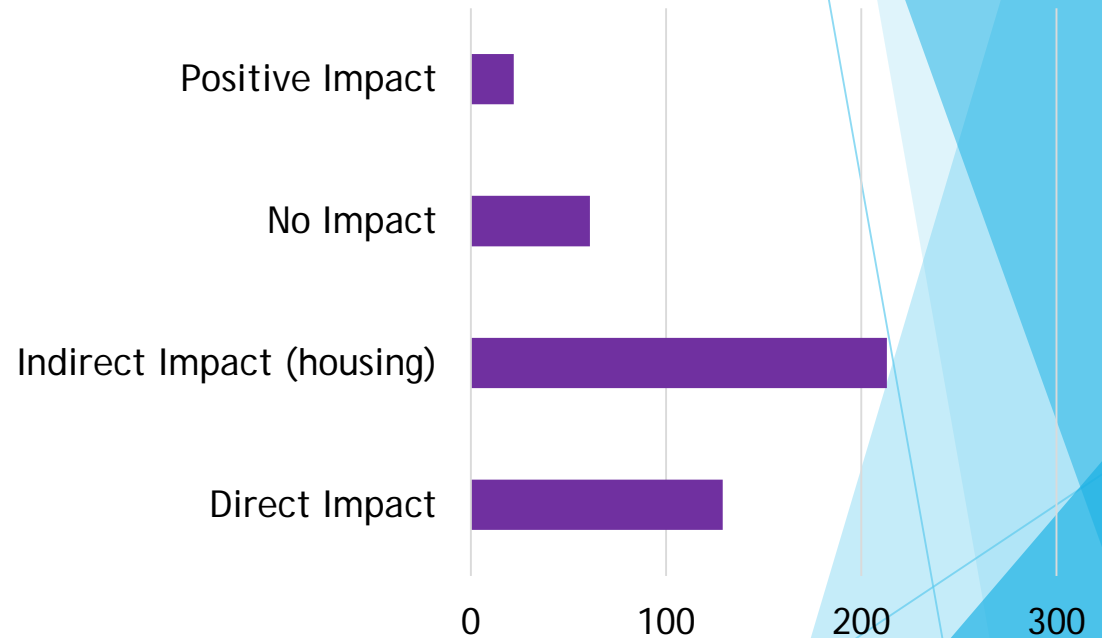
"If owners normally rent to University and College students, the owner should be permitted to provide short-term rentals when the unit is not occupied during the summer months. This would help students in that they wouldn't have to pay rent during the summer in order to secure a unit for the next school year."

Attachment L

Have you been impacted by STRs in your neighbourhood?



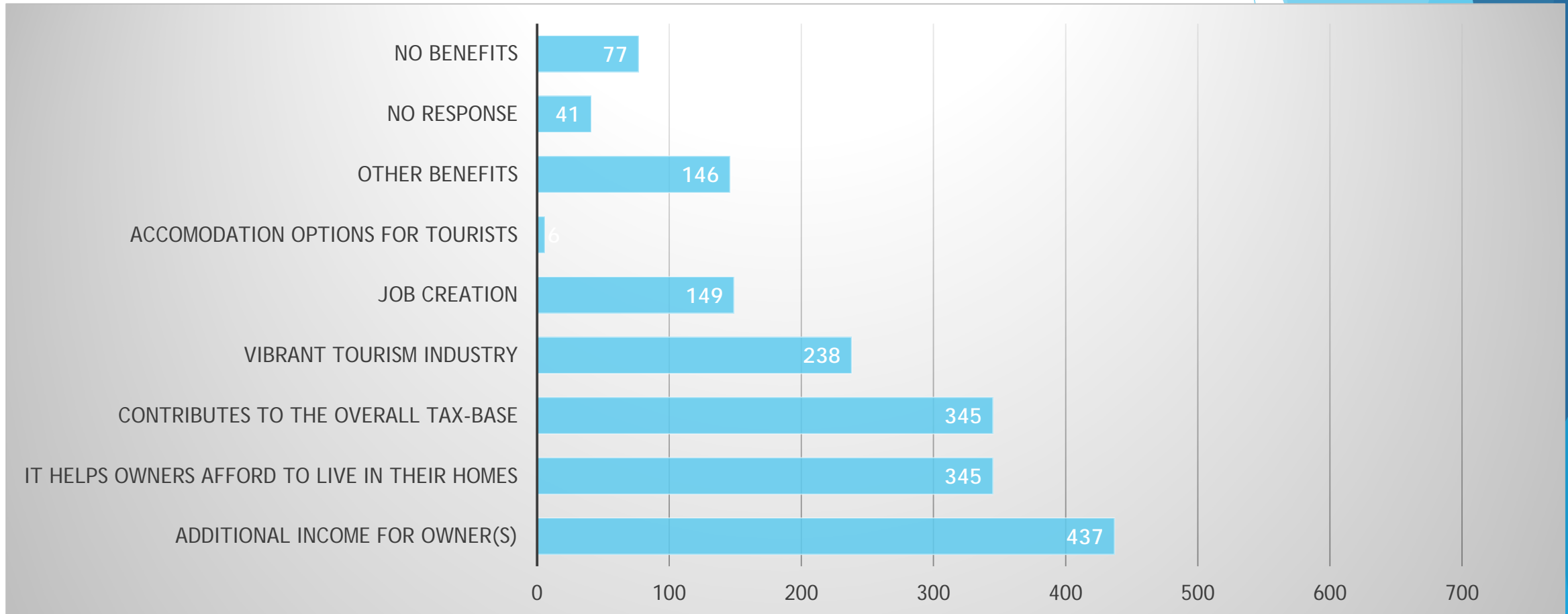
If so, how?



"We had to find new housing for my mother because her long-term rental apartment was sold and turned into an AirBnB. She did not have the funds to buy and no decent rentals were available - she is on the subsidized housing wait list but they said it would be years."

Attachment L

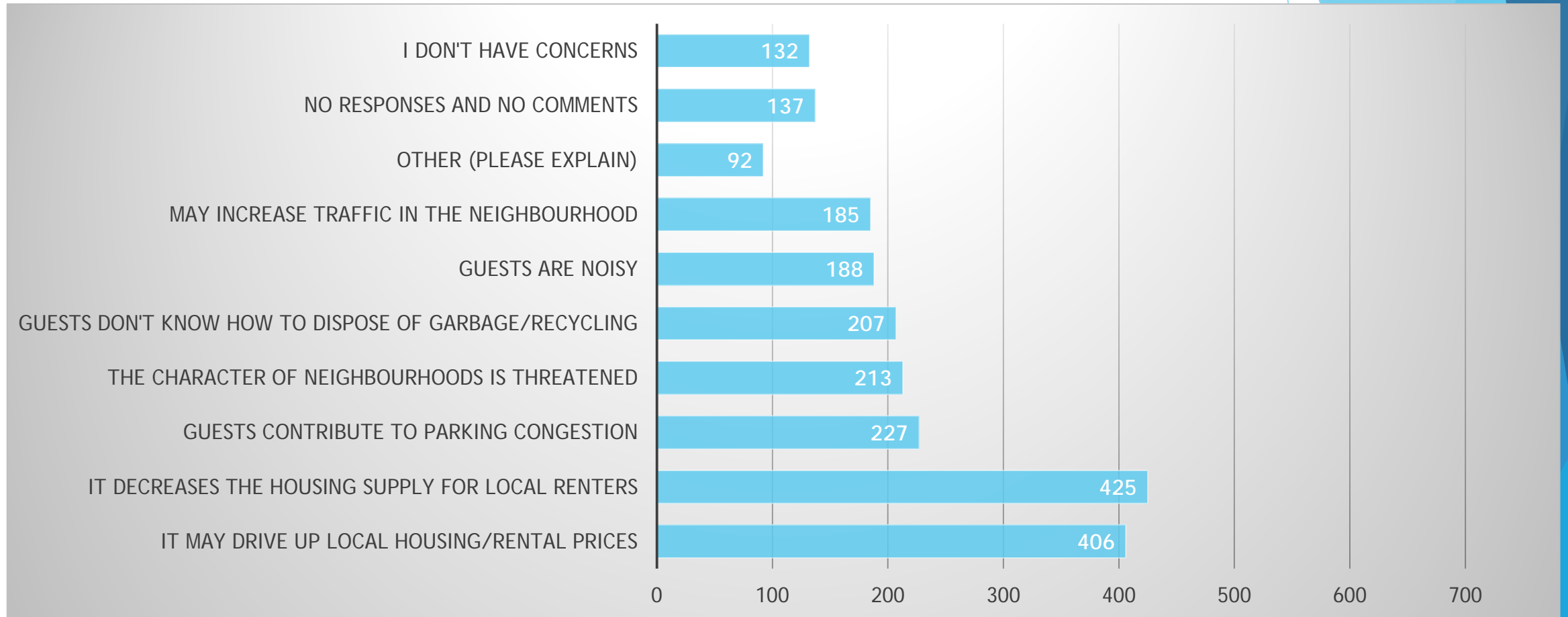
Do you feel there are benefits to short term rentals?



"A rental property, especially short-term, can be an important factor in acquiring, maintaining, and afford a first home for a young person.... As a first-time owner in a 150+ year old home, it has really been a great thing."

Attachment L

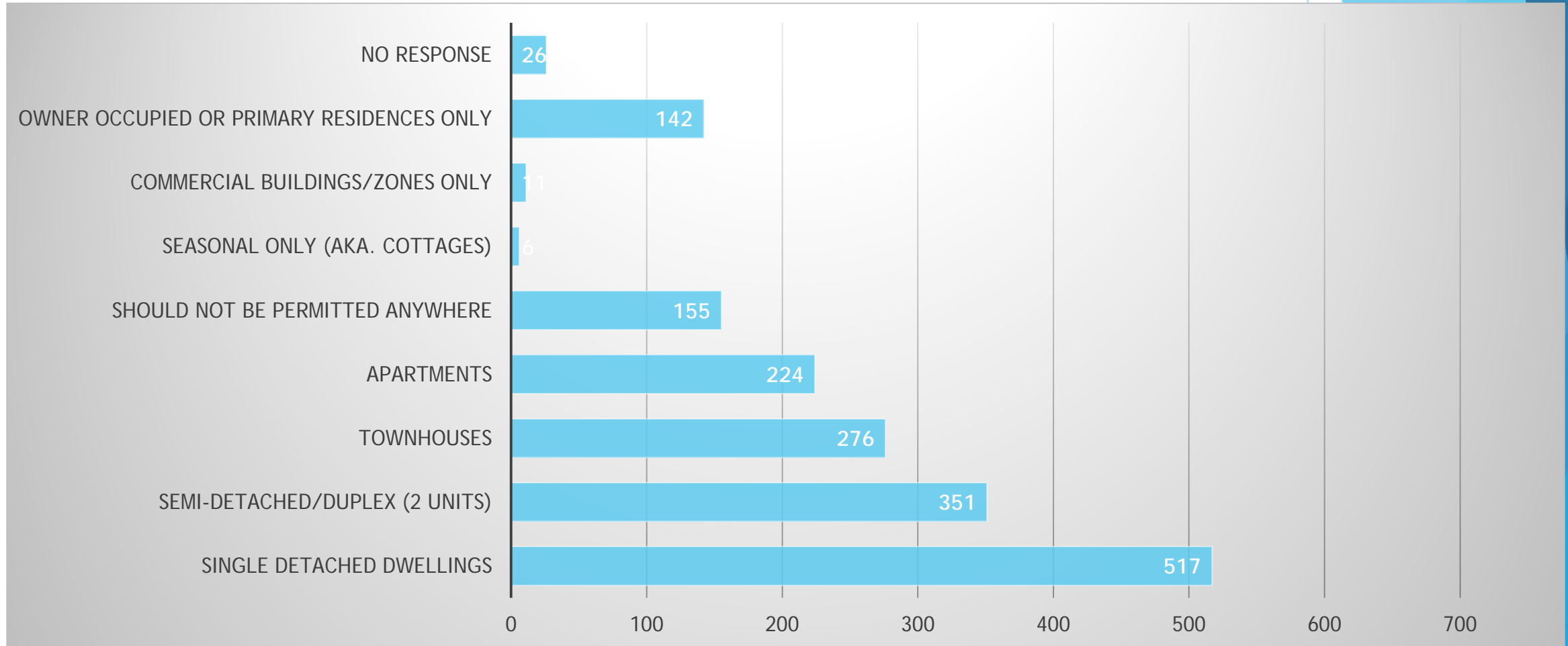
Do you feel there are impacts from short term rentals?



"I have a short term rental next to me. Guests arrive late, make noise, don't know how to use garbage sorting, occasional parties on week nights."

Attachment L

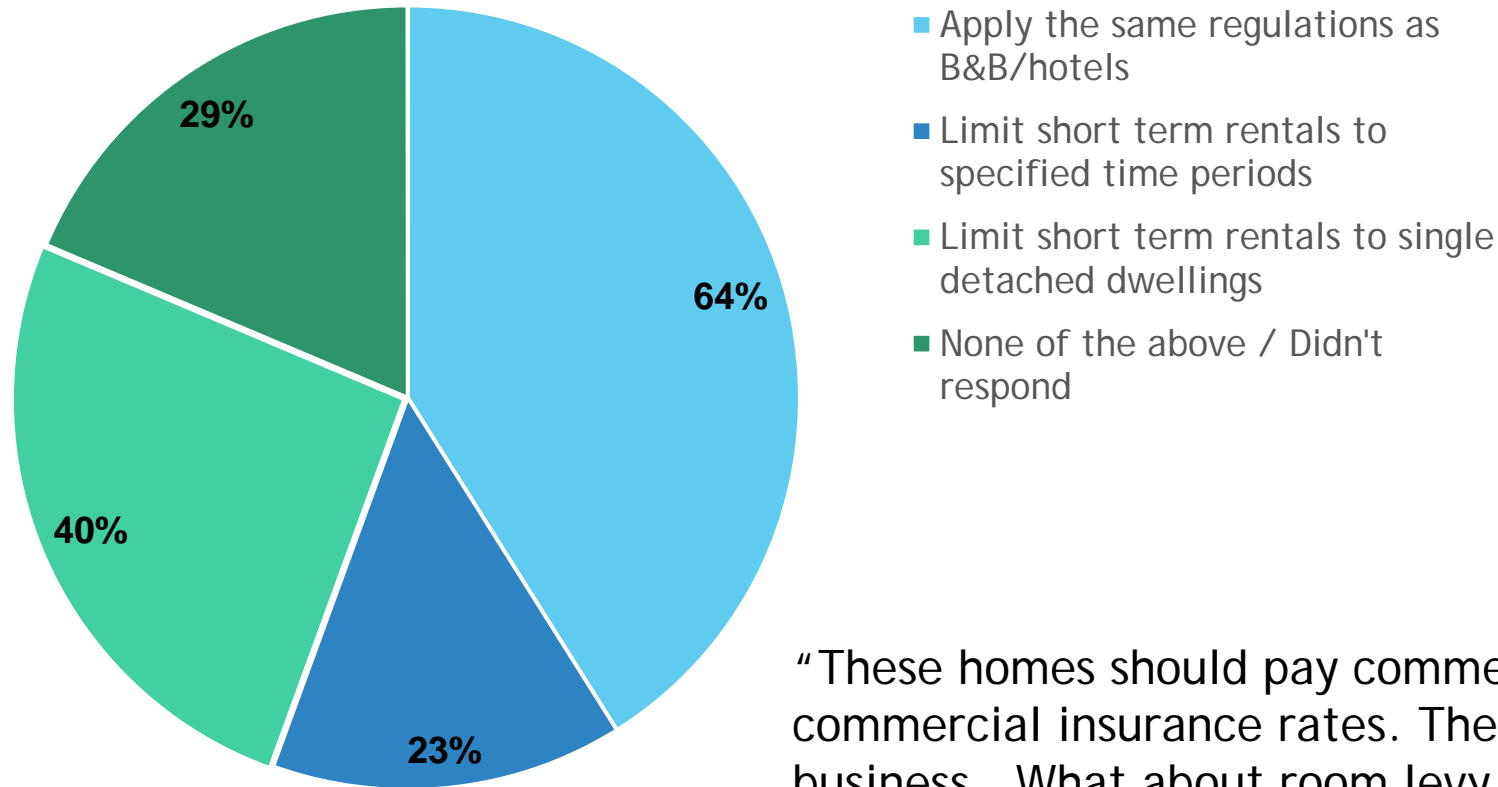
What type of dwelling units are most appropriate for short term rentals?



"I dont think the dwelling type is the issue. The issue is the amount of dwellings shifting to Airbnb."

Attachment L

What can the City do to regulate short term rentals and protect housing supply?

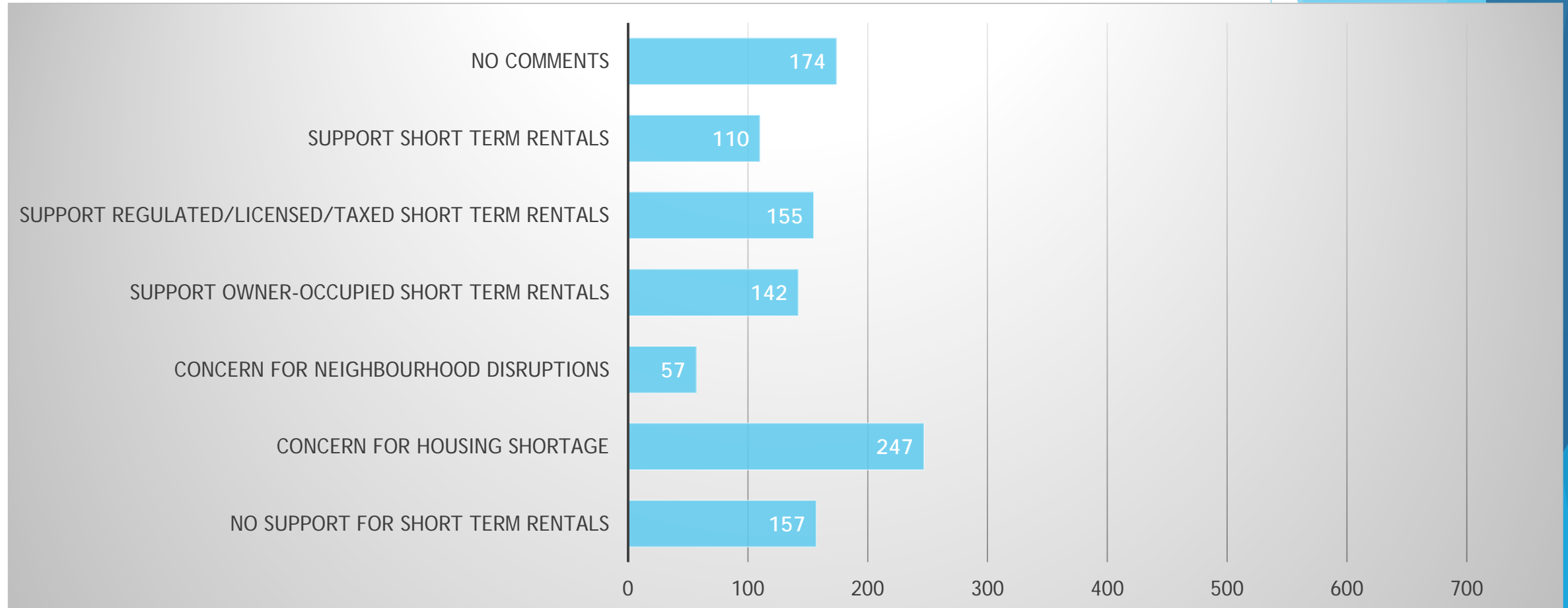


"These homes should pay commercial tax rates and commercial insurance rates. They are operating a business. What about room levy and paying applicable provincial [property] and federal [income/HST] taxes?"



Attachment L

Overall Survey Comment Categories



“The problem is simple. Airbnb (according to its original spirit) is supposed to allow people to either (a) occasionally rent out their home for temporary periods when they are elsewhere or (b) rent out a room or space within their home, for short periods. What is happening is that people are taking advantage of the situation, buying up residential units (houses or apartments) and turning them into a lodging business....”

Attachment L

Thank you

Should you have questions or want to provide additional feedback please contact the Planning Department at planning@charlottetown.ca

Short-term rentals in Charlottetown

Market overview, housing
impacts, and regulatory
modelling

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A report prepared for the Planning and Heritage
Department, City of Charlottetown, by the
Urban Politics and Governance research group,
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Executive summary

This report analyzes short-term rentals in the City of Charlottetown and models five regulatory scenarios. It provides a general market overview of STRs in Charlottetown, along with their spatial distribution and trends in their seasonal or long-term patterns. It measures the impacts of STRs on the Charlottetown housing market, particularly with respect to questions of housing availability and affordability. And it analyzes the sources of STR supply in Charlottetown, especially the division in the market between casual “home sharers” and dedicated “commercial operators”.

SHORT-TERM RENTAL MARKET OVERVIEW

- On September 1, 2019 there were **635 short-term rentals active in housing units in Charlottetown**—an 18.5% year-over-year increase.
- The 409 hosts operating active listings in Charlottetown earned **\$8.5 million in revenue** 2019. The top Charlottetown host earned more than \$430,000 in 2019, while median host revenue was \$19,300.
- **Current listings are concentrated in the centre of Charlottetown, but growth is faster in outlying areas.** Three in five listings are located in the Queen Square and St. Avaris wards, while Beach Grove had the highest listing growth rate (200%).
- **Charlottetown’s STR market is dominated by entire-home listings**, which make up 77% of active listings and earned 89% of all host revenue in 2019.
- Family-suitable **homes with two or more bedrooms make up 73% of entire-home listings** in Charlottetown.
- Charlottetown has the most seasonal variation of any Canadian STR market, with **70% of reserved nights occurring between May 1 and September 30.**
- Just five percent of hosts earned over a third (36%) of all revenue last year, and **the most successful ten percent of hosts earned nearly half (47%) of all STR revenue.**

HOUSING MARKET IMPACTS

- **STRs removed an average of 138 housing units from Charlottetown’s long-term housing market** in 2019, and additional 55 units were active full-time during the summer high season.
- **STRs are responsible for 38% of all rent increases in Charlottetown since 2017.** The growth of STRs in Charlottetown has cost the average Charlottetonian renter \$292 since 2017.

- **Charlottetown has the fifth lowest vacancy rate (1.2%) of any Canadian city**, and our projections suggest it will remain

below 3% for the next three years. We estimate that, if there were no dedicated STRs, the city would currently have a 2.9% vacancy rate.

HOME SHARERS AND COMMERCIAL OPERATORS

- **Commercial multilistings**—listings controlled by hosts with multiple listings—**account for just over half of active listings (52%) and host revenue (55%)** in Charlottetown.

- We estimate that **54% of listings were operated in their hosts' principal residences**, but these listings were only responsible for 41% of reserved nights during the year.



REGULATORY SCENARIO MODELLING

- We evaluate five scenarios for regulating STRs in Charlottetown, which range from banning all non-principal-residence and apartment listings to limiting non-principal-residence listings to commercially and mixed-use zoned neighbourhoods.
- The scenarios would permit between 48 and 61% of current listings to continue to operate unimpeded, would return between 50% and 90% of lost housing units to the long-term market, and would all significantly improve the rental vacancy rate.
- To address a STR supply shortfall which might result from each of the scenarios, 219 to 306 new listings and 22.4 to 30.0 additional nights booked per listing, would be required if the City achieved 100% regulatory compliance. The ranges fall to 104-144 listings and 11.5-15.6 nights for 50% compliance rate.
- We conclude that there is little risk of an adverse tourism accommodation supply shock occurring in the wake of stronger regulations on STRs in Charlottetown, even under the more restrictive scenarios being contemplated.

Scenario	% of current listings still allowed	% of 2019 reserved nights allowed	Units returned to market (% of total)	2020 estimated rental vacancy rate (compared to 0.6% baseline)	Minimal additional listings required (75% compliance rate)	Minimal additional nights booked required (75% compliance rate)
Scenario 1: Principal residence only, no apartments	47.6%	34.8%	125 (90%)	2.2%	224	22.8
Scenario 2: Principal residence only, apartments allowed	53.9%	39.8%	122 (88%)	2.1%	196	21.0
Scenario 3: Principal residence only, no apartments, but commercial zones allowed	52.4%	40.3%	87 (63%)	1.7%	200	20.5
Scenario 4: Principal residence, apartments allowed, and commercial zones allowed	57.3%	44.1%	86 (62%)	1.7%	179	19.1
Scenario 5: Principal residence, apartments allowed, commercial and DMUN zones allowed	60.9%	49.2%	69 (50%)	1.4%	160	17.1

HOST COMPLIANCE DATA ANALYSIS

- The UPGo/AirDNA dataset used to perform the analysis in this report has comparable listing coverage to the Host Compliance dataset which the City has access to.
- The Host Compliance data has sufficient coverage to provide a reliable overview of the STR market, and to track changes over time.
- Because the HC dataset lacks detailed activity data, it cannot be used to conduct adequate housing-market impact analysis.
- It should be feasible to monitor questions relating to the supply of STRs and their regulatory compliance in Charlottetown using the HC data.

Introduction

In December 2019, researchers from the Urban Politics and Governance research group (UPGo) at McGill University were commissioned by the Planning and Heritage Department of the City of Charlottetown to provide an empirical overview of the short-term rental (STR) market in Charlottetown, with a particular emphasis on three topics:

1. A general market overview of the key facts about STRs in Charlottetown, along with their spatial distribution and trends in their seasonal or long-term patterns.
2. The impacts of STRs on the Charlottetown housing market, particularly with respect to questions of housing availability and affordability.

3. The sources of STR supply in Charlottetown, especially the division in the market between casual “home sharers” and dedicated “commercial operators”.

UPGo was further asked to model the potential impacts of a series of different regulatory scenarios on the latter two topics; i.e., how would different STR regulations affect housing availability and affordability in Charlottetown, and how would they affect the supply of STRs in Charlottetown? Finally, we were asked to assess the reliability of data collected by the firm Host Compliance, and its potential utility in assessing STR market impacts and facilitating regulation monitoring and enforcement. What follows is the results of these tasks.



DATA AND METHODOLOGY

The analysis in this report is based on a combination of private and public data sources. The key sources are as follows:

- Listing and activity data about Airbnb, HomeAway and VRBO short-term rental listings gathered by the consulting firm AirDNA. This data includes canonical information about every STR listing on the Airbnb or HomeAway platforms which was active in the City of Charlottetown between 1 January 2016 and 31 December 2019. This includes information such as the listing type (entire home, private room, shared room or hotel room), the number of bedrooms, the advertised daily price, and the approximate location of the listing. All of this information is publicly available on the Airbnb or HomeAway websites, and was collected through frequent “web scrapes” by AirDNA. In addition to this canonical information, AirDNA provides estimates of daily listing activity: whether a given listing was reserved, available or blocked. AirDNA computes these estimates by monitoring the calendar availability of listings, and noting changes in status from available to unavailable, then using a machine-learning model to decide probabilistically whether a given status change represented a reservation or a host blocking dates off as unavailable. We use this data for our core analysis of the STR market, including our counts of active listings, our breakdown of different listing types, our estimates of STR-induced housing loss, and our estimates of listings which are commercial operations and which are located in hosts’ principal residences.
- Additional data about Airbnb listings collected by McGill University researchers, including web scrapes of listings to verify activity and location.
- Data on STR operators collected by the consulting firm Host Compliance on behalf of the City of Charlottetown. This data was used to validate the results of the primary analysis, and additionally to explore the feasibility of reproducing the analysis with the Host Compliance data alone.
- Data about housing assessment, development and permits, provincial short-term rental registrations, and land-use zoning, from the City of Charlottetown. This data was used, first of all, to carry out regulatory scenario modelling, in particular for identifying the building type and applicable zoning for short-term rental listings. Some of the scenarios envisage regulating STR listings located in apartment buildings differently from listings located in houses. We used the City of Charlottetown’s definition of an apartment as a housing unit located in a building with three or more units, and relied on a Bayesian statistical analysis method for probabilistically estimating the building type of listings in cases where the exact address is not known. We also use this data for housing market analysis, in particular for estimating the city’s future rental housing stock in light of existing trends and new housing starts and completions.
- Statistics Canada data about the distribution of population and dwellings within Charlottetown from the Census, and Canada Mortgage and Housing Corporation (CMHC) data about the Charlottetown housing market, including unit numbers, rents, and the rental vacancy rate.

In order to facilitate public understanding and scrutiny of our work, complete methodological details, along with the code necessary to reproduce this analysis, are freely available under an MIT license on the UPGo GitHub page at github.com/UPGo-McGill/charlottetown-analysis.

1. Short-term rental market overview

There were 635 STR listings in Charlottetown housing units on September 1, 2019—a 7.9% increase since the previous year. Charlottetown’s STR market is comparable to other cities in Atlantic Canada, relative to the city’s size. Most listings are located in the Queen Square and St. Avards wards, but growth is highest in outlying wards. Three quarters of listings are entire homes—and these listings earn 90% of all host revenue. Charlottetown has the most seasonal variation of any Canadian STR market, with 70% of reserved nights occurring between May 1 and September 30. More than one third of all revenue is earned by one in twenty hosts.

ACTIVE DAILY LISTINGS AND ANNUAL REVENUE

“Active daily listings” are those which were displayed on the Airbnb.ca, HomeAway.ca, or VRBO.ca website on a given day, regardless of their availability status (reserved, available, or

blocked). It is the clearest and least ambiguous means of determining the overall size of the short-term rental market in a location, particularly with respect to change over time. On September 1,

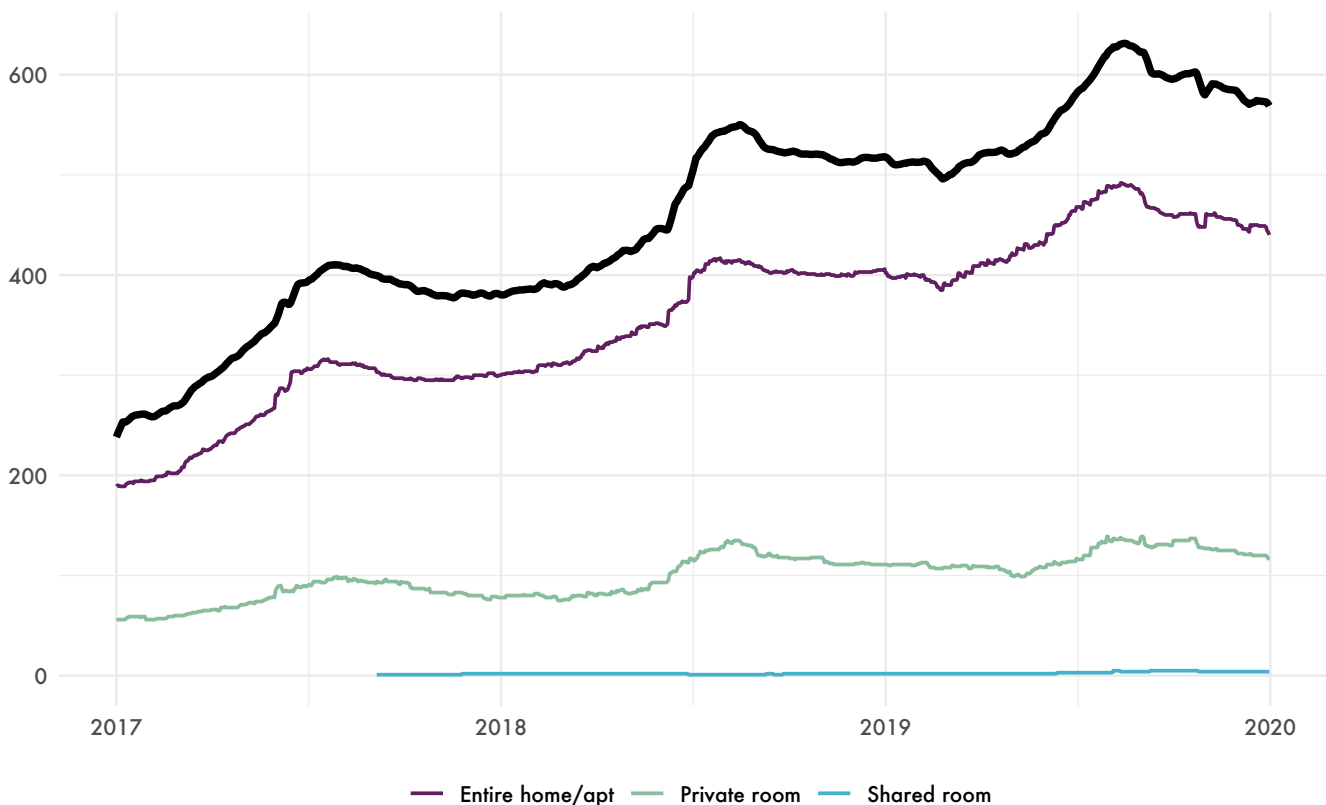


Figure 1. Active daily STR listings in the Halifax Regional Municipality

City	Active listings	Listings per 1000 households	Host revenue (2019)	Revenue per listing
Charlottetown	635	12.1	\$8.5 million	\$13,400
Halifax	2,483	13.2	\$34.3 million	\$13,800
St. John's	982	18.8	\$10.3 million	\$10,500
Lunenburg	394	28.1	\$5.4 million	\$13,700
Moncton	377	10.7	\$3.7 million	\$9,800

Table 1. STR activity in the top five Atlantic Canada cities

2019 (near the peak of the summer season), there were 711 active listings in Charlottetown. 76 of these were hotels or other traditional accommodation providers using the Airbnb or HomeAway platform for bookings. In all the analysis that follows, we have excluded those 76 listings and focused on the remaining 635 listings in housing units.

STR listings located in housing units in Charlottetown earned \$8.5 million in 2019. The number of active listings in Charlottetown increased 7.9 % from the previous year, although the pattern of active listings shows considerable fluctuation throughout the year, with listing numbers at their

lowest in February and rising steadily through August, after which point they decline again. (This seasonality pattern is discussed in more detail below). Figure 1 shows the growth rate of active daily listings in Charlottetown.

Compared with other cities in Atlantic Canada, Charlottetown's STR market is similar in scale relative to the area's size. On a per-dwelling basis, Charlottetown has about the same number of active STR listings as Halifax and Moncton, and fewer than St. John's or Lunenburg. Per-listing revenue in Charlottetown is approximately as high as the other most profitable markets in Atlantic Canada (Table 1).

WHICH STR PLATFORMS ARE USED IN CHARLOTTETOWN?

Of the 834 STR listings which were active in Charlottetown homes at any point in 2019, 678 (81.3%) of them were listed exclusively on Airbnb, 86 (10.3%) were listed exclusively on

HomeAway or VRBO, and 70 (8.4%) were listed on both Airbnb and one of the other platforms. Those 834 listings were operated by 409 separate hosts.

HOW MANY STR LISTINGS ARE REGISTERED WITH THE PROVINCE?

Like other tourism proprietors, short-term rental operators on Prince Edward Island are obligated under the Tourism Industry Act to register their operations with the provincial government. Of the 834 STR listings in Charlottetown active at

some point in 2019, we were only able to identify 265 which were registered. More than two thirds of listings (570) are not registered, and are therefore non-compliant with the Tourism Industry Act.

WHERE ARE STR LISTINGS LOCATED IN CHARLOTTETOWN?

There are active STR listings in all 10 of Charlottetown's wards, but the largest concentration by far is in the 500-lot area. Figure 2 shows the distribution of active STRs expressed as a percentage of all housing units; the left panel aggregates this measurement by dissemination area—the smallest unit at which Statistics Canada disseminates Census results—and the right panel aggregates by ward. A majority (61.1%) of all active listings are located in the Queen Square

and St. Avars wards, which together accounted for an even higher percentage (70.0%) of 2019 host revenue (Table 2). Conversely, listing growth is highest in outlying wards which currently have low numbers of STR listings—in particular Beach Grove, Falconwood and Mount Edward. Beach Grove had the highest year-over-year growth rate in listings, at 200.0%, while St. Avars was the only ward which saw listings decline year-over-year, with a loss of 0.8%.

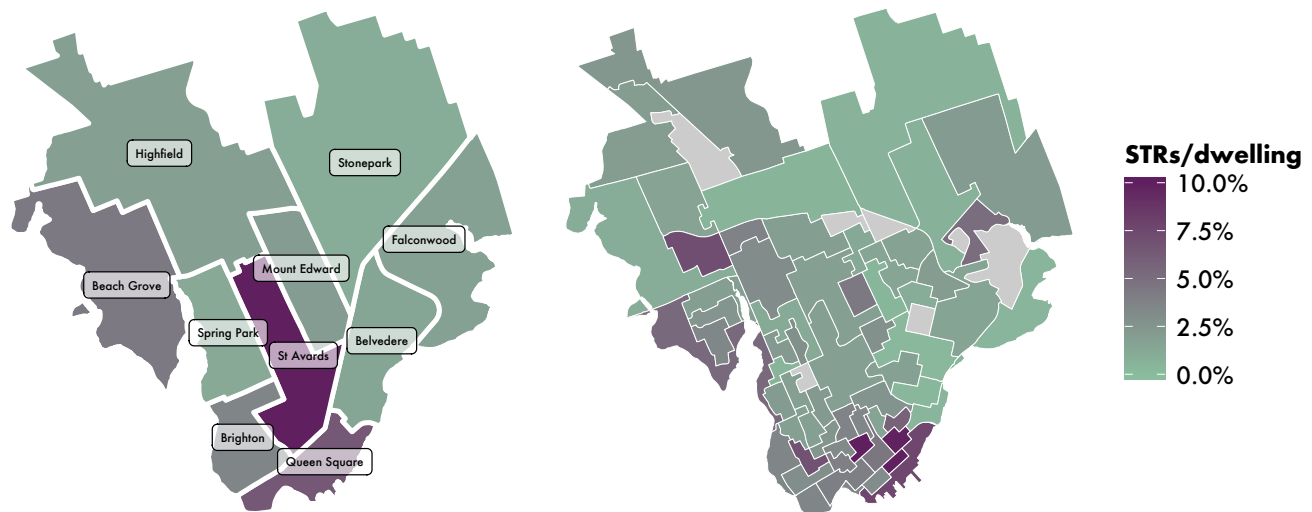


Figure 2: Active STRs as a share of all dwelling units in Charlottetown, by ward (L) and dissemination area (R)

LISTING TYPE PREVALENCE

STR listings can be entire homes, private rooms, shared rooms or hotel rooms. Most policy attention has focused on entire-home listings, under the theory that these listings are most likely to generate harmful negative externalities, including housing loss and neighbourhood nuisance. Table 3 provides the breakdown of listing types in Charlottetown on September 1,

2019. (No hotel rooms are listed, because these are located in non-housing listings excluded from our analysis.) It demonstrates that Charlottetown's STR market is dominated by entire-home listings, which make up more than three quarters (76.7%) of active listings and earned 89% (or \$7.6 million) of all host revenue in 2019. These numbers are similar to those for other Canadian cities.

Neighbourhood	Active listings	Annual listing growth	Annual revenue	% reservations from May-Sep.
<i>City of Charlottetown</i>	635	7.9%	\$8.5 million	70.8%
<i>Beach Grove</i>	51	200.0%	\$354,000	73.8%
<i>Belvedere</i>	25	78.6%	\$323,000	63.9%
<i>Brighton</i>	56	75.0%	\$713,000	76.9%
<i>Falconwood</i>	19	171.4%	\$160,000	89.9%
<i>Highfield</i>	29	20.8%	\$319,000	67.9%
<i>Mount Edward</i>	23	91.7%	\$271,000	79.5%
<i>Queen Square</i>	149	34.2%	\$286,000	64.1%
<i>Spring Park</i>	24	60.0%	\$141,000	82.7%
<i>St Avars</i>	239	-0.8%	\$312,000	73.4%
<i>Stonepark</i>	19	72.7%	\$261,000	81.4%

Table 2. STR activity by ward in the City of Charlottetown

Listing type	Active listings	Annual revenue	% of all listings	% of annual revenue	Revenue per listing
<i>Entire home/apt.</i>	487	\$7.6 million	76.7%	89.0%	\$15,000
<i>Private room</i>	144	\$0.9 million	22.7%	10.9%	\$5,800
<i>Shared room</i>	4	\$0.0 million	0.6%	0.1	\$2,500

Table 3. Listing type prevalence in the City of Charlottetown

LISTING SIZE

Since a significant portion of STRs in Charlottetown are operated out of housing units which could otherwise be housing a long-term resident, the size of these units is an important factor in determining the impact of STRs on housing supply in the city. If most housing units listed as STRs are studios and one-bedroom apartments, the opportunity cost of not housing long-term residents in those units will be somewhat lower than if most of the units are family-sized.

26.6% of entire-home STR listings in Charlottetown are studio (4.3%) and one-bedroom (22.3%) units, while units with two bedrooms or three or more comprise 35.1% and 38.3% of the listings respectively (73.4% total).

The Canada Mortgage and Housing Corporation considers units with two or more bedrooms to be family-suitable units. These

larger units are proportionately under-represented on STR platforms—they are 73.4% of entire-home listings, but 82.4% of total dwelling units in Charlottetown. However, they

nevertheless represent a majority of the short-term rental market in Charlottetown, and thus a potential threat to the supply of family-appropriate housing in the municipality.

SEASONALITY

Short-term rentals exhibit some degree of seasonality in all Canadian markets, with a disproportionately large share of STR reservations occurring in the summer months. But Atlantic Canada in general, and Charlottetown in particular, exhibit very high levels of seasonality. Controlling for underlying growth trends, 70.8% of reserved nights and 75.3% of host revenue in Charlottetown occur between May 1 and September 30. This is the highest proportion of

any of the top 40 urban markets in Canada (Figure 3). As summarized in the final column of Table 2, above, seasonality varies to some extent by ward, with Belvedere displaying the least seasonal variation (63.9% of reservations in May through September) and Falconwood the highest (89.9% of reservations in May through September), although the underlying volumes of activity are low enough that these differences are not highly significant.

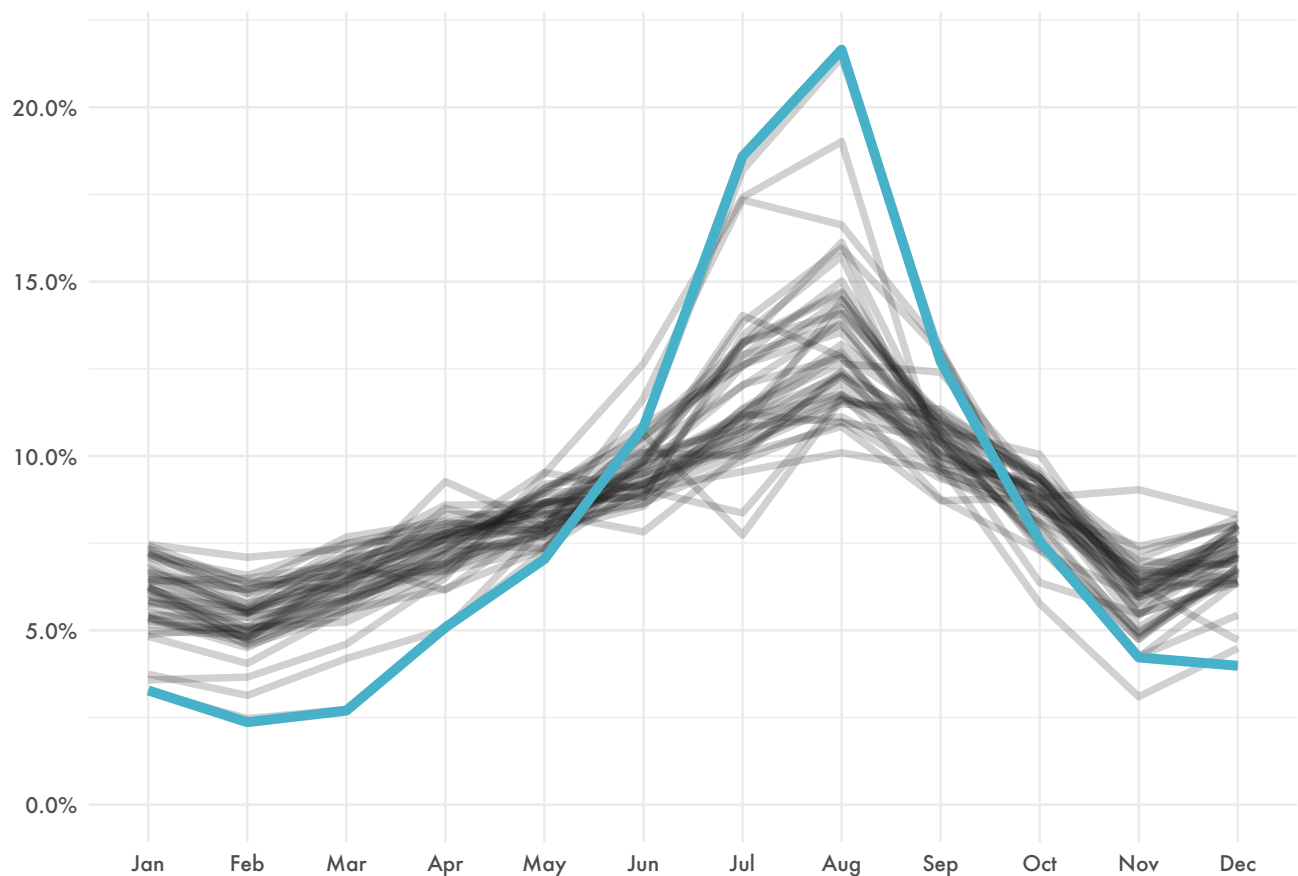


Figure 3: Percentage of growth-adjusted STR reservations occurring each month in Charlottetown (highlighted) and other major Canadian markets

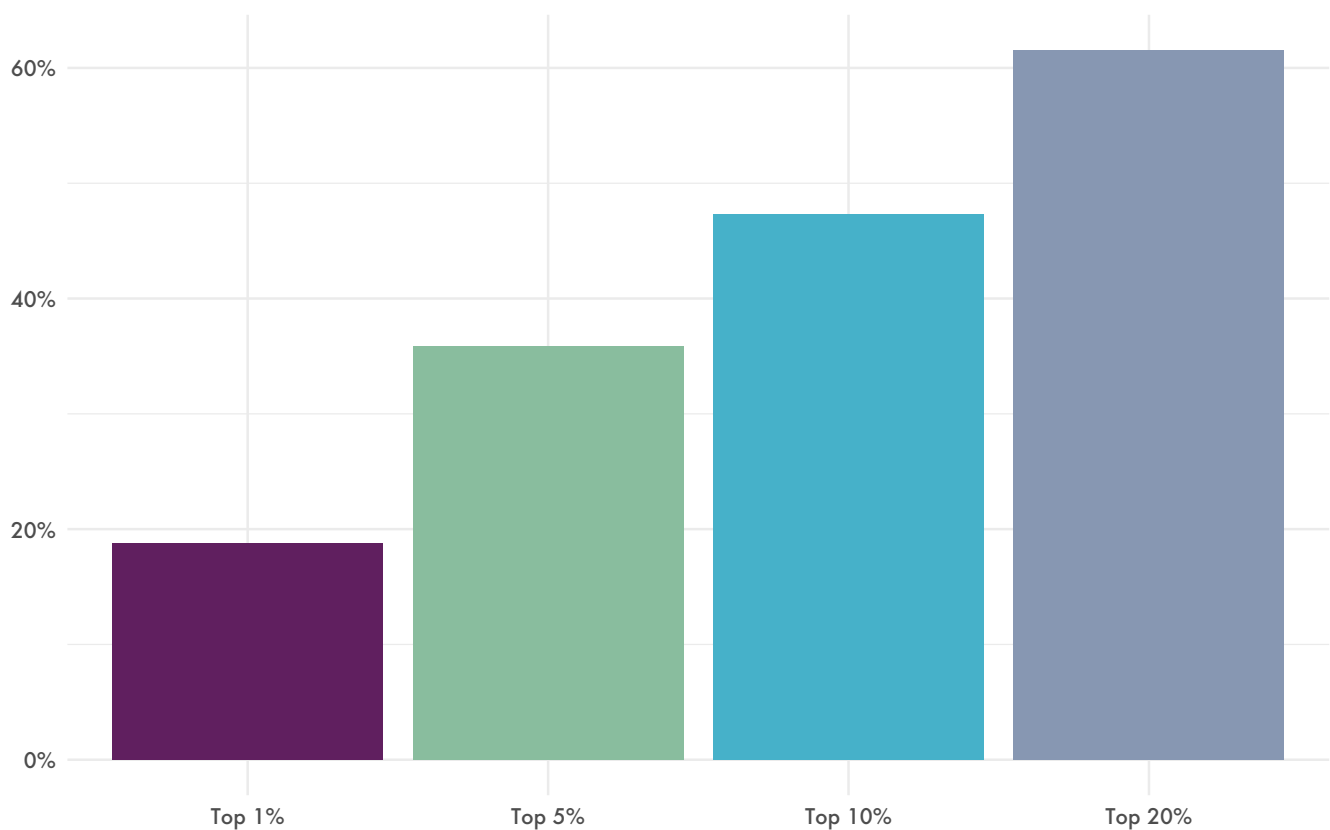


Figure 4. STR host revenue distribution in the City of Charlottetown

REVENUE DISTRIBUTION

A crucial distinction for understanding the structure of an STR market is the distinction between casual STRs (“home-sharing”) and dedicated STRs (“commercial operations”). There are multiple ways to capture this distinction, and we examine it in more detail in subsequent pages, but one way is to examine the distribution of revenue among STR hosts. Is revenue widely distributed between many part-time hosts of single listings, or concentrated among a small number of commercial operators who control many full-time listings?

Figure 4 shows the percentage of the total \$8.5 million in STR revenue last year which accrued to the top twenty percent, ten percent, five percent and one percent of Charlottetown hosts. More than one third (35.9%) of all revenue last year was

earned by just one in twenty hosts, and the most successful ten percent of hosts earned nearly half (47.3%) of all STR revenue. As Table 5 shows, the median host revenue in Charlottetown last year was \$19,300, while the top earning host earned almost \$440,000.

Host percentile	Annual revenue
25th percentile	\$9,000
50th percentile (median)	\$19,300
75th percentile	\$34,000
100th percentile	\$439,700

Table 4. Charlottetown STR host earnings

2. Housing market impacts

Charlottetown's rental market is one of the tightest in the country, with a 1.2% rental vacancy rate. STRs took an average of 138 housing units off the rental market in 2019—a number which rose to 193 during the summertime. This is a 99% increase over the past two years, and approximately three times the vacant and available for rent units available during 2019. We estimate that STRs are responsible for more than a third of all rent increases in the city in the last three years—an average of \$292 per renter. Taking into account a large amount of new housing construction, we expect the rental vacancy rate to rise to 2.0% by 2022, although we estimate the vacancy rate would be 4.1% in the absence of dedicated STRs.

CHARLOTTETOWN HOUSING CONTEXT

The Charlottetown housing market has been under considerable stress in the last several years. In 2018, the city had the lowest rental vacancy rate in the entire country (0.2%), and while the vacancy rate has increased somewhat in 2019, it remains in the bottom five nation-wide (1.2%), while rent increases have threatened Charlottetown's status as one of the country's most affordable cities.

As of the 2016 census, Charlottetown had just under 17,200 dwellings. Extrapolating from

housing completion data from CMHC, which shows that around 550 new units were completed between 2017 and 2019, the number of dwellings has increased since then by 3.2%, to approximately 17,750. Additionally, City permitting data shows that the City of Charlottetown saw 1,165 new housing unit starts between 2017 and 2019, with most of these starts occurring in 2018 and 2019 (see Table 5). This implies a relatively rapid increase in units over the next several years, as these approved projects are completed.

A significant and growing share of housing in Charlottetown is rental housing. As of October 2019, there were 4,918 "primary" rental housing units—apartments and townhouses—in the city of Charlottetown, which is nearly 30% of all units. Many Charlottetown families also live in "secondary" rental units, which include rented condominiums and secondary suites, but which are not tracked in CMHC's annual data. The primary rental stock has been growing substantially faster than the rest of the city's housing—it increased by 3.0% from 2018 and by

Year	Total units (starts)	Rental units (starts)
2015	410	259
2016	282	190
2017	182	75
2018	150	75
2019	135	67
Total	1,159	666

Table 5. Charlottetown housing starts



6.2% since 2014. Furthermore, three in five housing completions (61.6%) and housing starts (59.9%) between 2017 and 2019 were intended for the primary rental market, which implies a further shift in the Charlottetown housing market toward rental units.

This expansion in rental housing comes in the face of extremely challenging circumstances for Charlottetown renters. In the last decade, Charlottetown's rental vacancy rate peaked at 7.9% in 2013, but then dropped steadily until 2018. In October 2018, the city had the lowest rental vacancy rate in all of Canada, at 0.2%. Given the size of the city's rental market, this means that there were close to zero apartments available for anyone in the city trying to find one. This is a clear sign that there was not enough rental housing available to meet the demand coming from existing residents and newcomers to the Island. The vacancy rate has since increased to

1.2% in October 2019—a sharp increase in a single year, but still far below the 3% vacancy rate which is considered an absolute minimum for a healthy rental market. Charlottetown currently has the fifth lowest vacancy rate of any Canadian city, after Victoria (1.0%), Halifax (1.0%), Vancouver (1.1%), and Abbotsford (1.1%). There are 11 total cities with vacancy rates under 2%, out of the 37 cities (those with populations over 10,000) surveyed.

Thanks to these tight rental market conditions, rents in Charlottetown have increased substantially in the last several years. The average monthly rent across all apartment types increased 1.8% from October 2018 to October 2019, from \$885 to \$901. Furthermore, rents have increased 13.6% since 2014, when the average rent was \$793. The average rent for a two-bedroom apartment is now \$937, an increase of 2.9% from 2018. However, in comparative terms Charlottetown remains relatively

affordable; in 2019, Charlottetown had the 9th lowest average rent (for a two-bedroom apartment) of all 37 Canadian cities with populations over 10,000. All cities with lower rents were in Quebec and New Brunswick. Trois-Rivières had the lowest average rent, at \$625, while Vancouver had the highest, at \$1,748. Additionally, the average two-

bedroom rent rose slower than the national average rate, which was 3.9% between 2018 and 2019. Of the 37 cities included in CMHC's dataset, 11 had smaller rates of rent increases, while 25 had higher rates of increase; Windsor, Sudbury, and the Ontario side of Ottawa-Gatineau all saw rents rise about 8% in 2019.

STR-INDUCED HOUSING LOSS

One of the most important considerations when gauging the impacts of STRs on a city is the extent to which STRs are removing long-term housing from the market. This process can occur either directly, where tenants are evicted or not replaced at the end of a lease, or indirectly by absorbing new construction or existing investment properties which otherwise would have gone onto the long-term market. To obtain a precise number of such cases of housing loss, STR hosts would need to be individually surveyed, which is infeasible because hosts are anonymous on the Airbnb and HomeAway platforms. The Host Compliance data, while providing identifiable host information for almost half of its listings, does not identify the hosts of every property.

One reasonable proxy for STR listings which represent long-term housing loss is commercial operations which are not operated out of a host's principal residence. These are discussed in more detail in the next section. Another method, arguably simpler, is to identify listings which are highly available throughout the year and which receive many bookings. Along these lines, we define frequently rented entire-home (FREH) listings as entire-home listings which were available on Airbnb or HomeAway a majority of the year (at least 183 nights) and were booked a minimum of 90 nights. Except in rare cases of residents who travel most of the year, it would be very difficult for someone to rent their home as an STR for the majority of the year and still actually live there. On September 1st, 2019 there were

111 FREH listings in Charlottetown. These listings are what the advocacy group Fairbnb has called "ghost hotels"—entire homes converted to dedicated STR operations. Each of these dwelling units could be housing Charlottetown residents, but instead, are serving as de facto hotels.

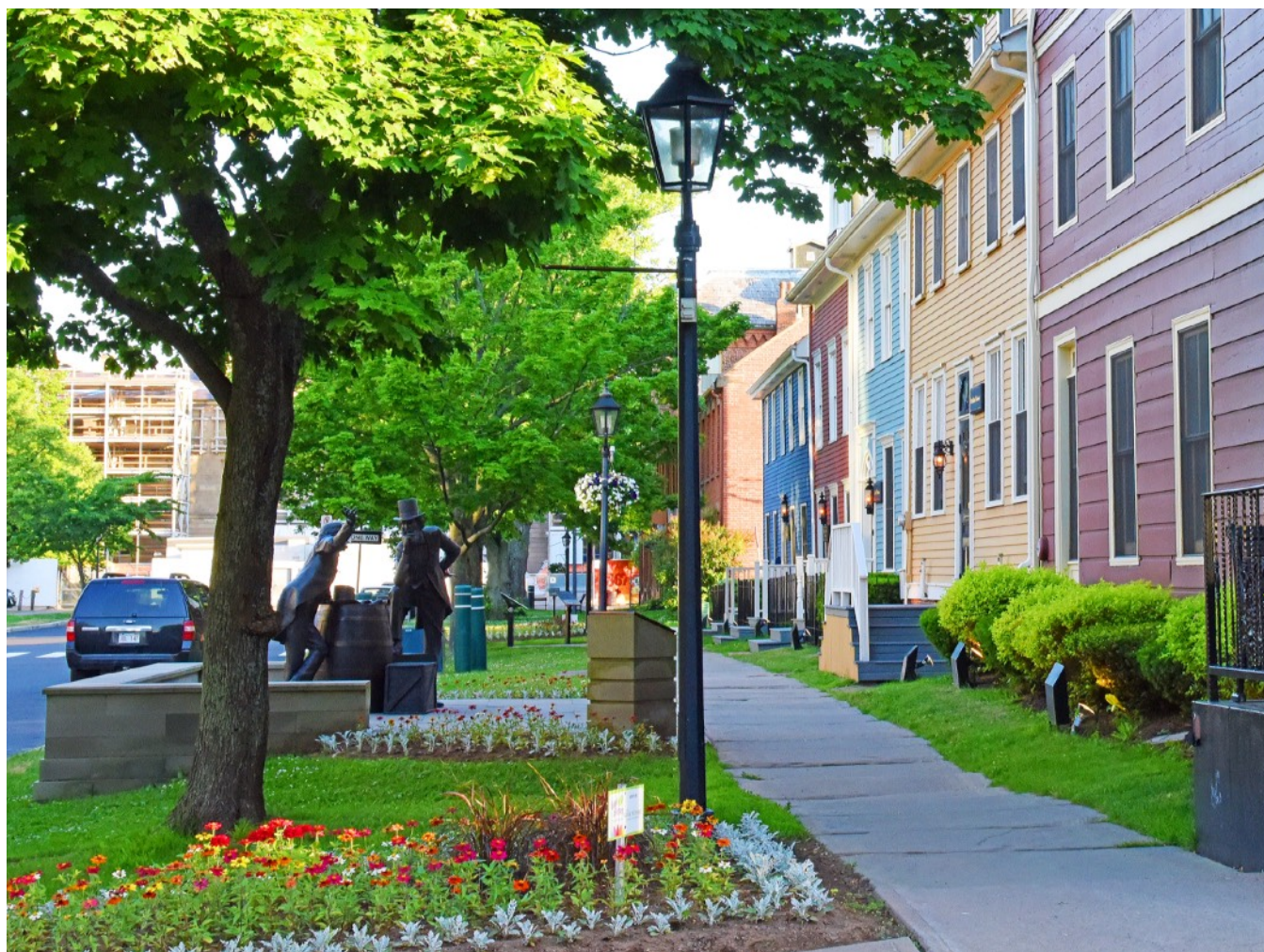
These 111 FREH listings are a good starting point for estimating housing loss caused by conversions to STR. However, it is also possible that private-room listings are contributing to housing loss, as a full-time private-room STR might have otherwise been offered to a roommate on a long-term lease. Additionally, it is also possible that entire housing units have been subdivided into multiple private-room listings. We call these "ghost hostels", in analogy to the ghost hotels discussed above. We detect ghost hostels by finding clusters of three or more private-room listings operated by a single host, whose reported locations are close enough to each other that they could have originated in the same actual housing unit. (Airbnb and HomeAway obfuscate listing locations by shifting them randomly up to 200 m.) In addition to the 111 FREH listings, we identified a further 24 housing units which had been converted into ghost hostels on September 1st, 2019.

On September 1st, 2019, we believe there were 135 housing units in Charlottetown which were being used as dedicated short-term rentals and therefore not being offered on the long-term rental market. 111 of these were frequently rented entire-home listings, and 24 were clusters of private-room

listings operating out of the same housing unit. The equivalent figure one year ago (September 1, 2018) was 124, which means that there has been an 8.9% increase in STR-induced housing loss in Charlottetown between those dates— more than the growth in total active listings in Charlottetown from 2018 to 2019 (7.8%). Taking into account seasonal fluctuations and underlying growth, the average number of housing units which we believe were converted to full-time STRs in Charlottetown was 55 in 2017, 125 in 2018, and 138 in 2019. At most point in the last three years, STR listings contributing to housing loss have grown faster than the STR market as a whole.

Because Charlottetown's STR market is highly seasonal, it may also be the case that there are STR listings which are operated full time during

the summer months but not throughout the rest of the year. Some of these units might be 8- or 9-month student housing and then become converted to full-time STR in May or June, some of these units might be dedicated STRs which are simply taken off the market during the slow non-summer season, and some of these units might be the principal residence of a person or family who spend summers outside of Charlottetown. In most cases, however, units operating full time throughout the summer imply a reduction in available housing for long-term residents during that time. We therefore identify listings which are highly available and reserved in the summer months (defined here as May through September, which is when the bulk of Charlottetown's STR activity occurs), but are not otherwise counted as FREH listings. These units were available or



reserved for 120 nights or more in the May-September period, and were reserved at least 60 nights during this time. An additional 55 units were identified in 2019 as being seasonally active full time, and in 2018 and 2017 there were 50 and 42 respectively. This brings the total average summertime housing loss numbers to 97 in 2017, 175 in 2018, and 193 units in 2019 (Figure 5).

To contextualize these figures, we note that in 2019 there were approximately 60 vacant rental units available for rent in Charlottetown at any given time. During the non-summer months of 2019, there were on average twice this number of full-time STRs which otherwise could be on the long-term rental market, while in the summertime this figure increased to three times the number of vacant rental units serving as dedicated STRs.

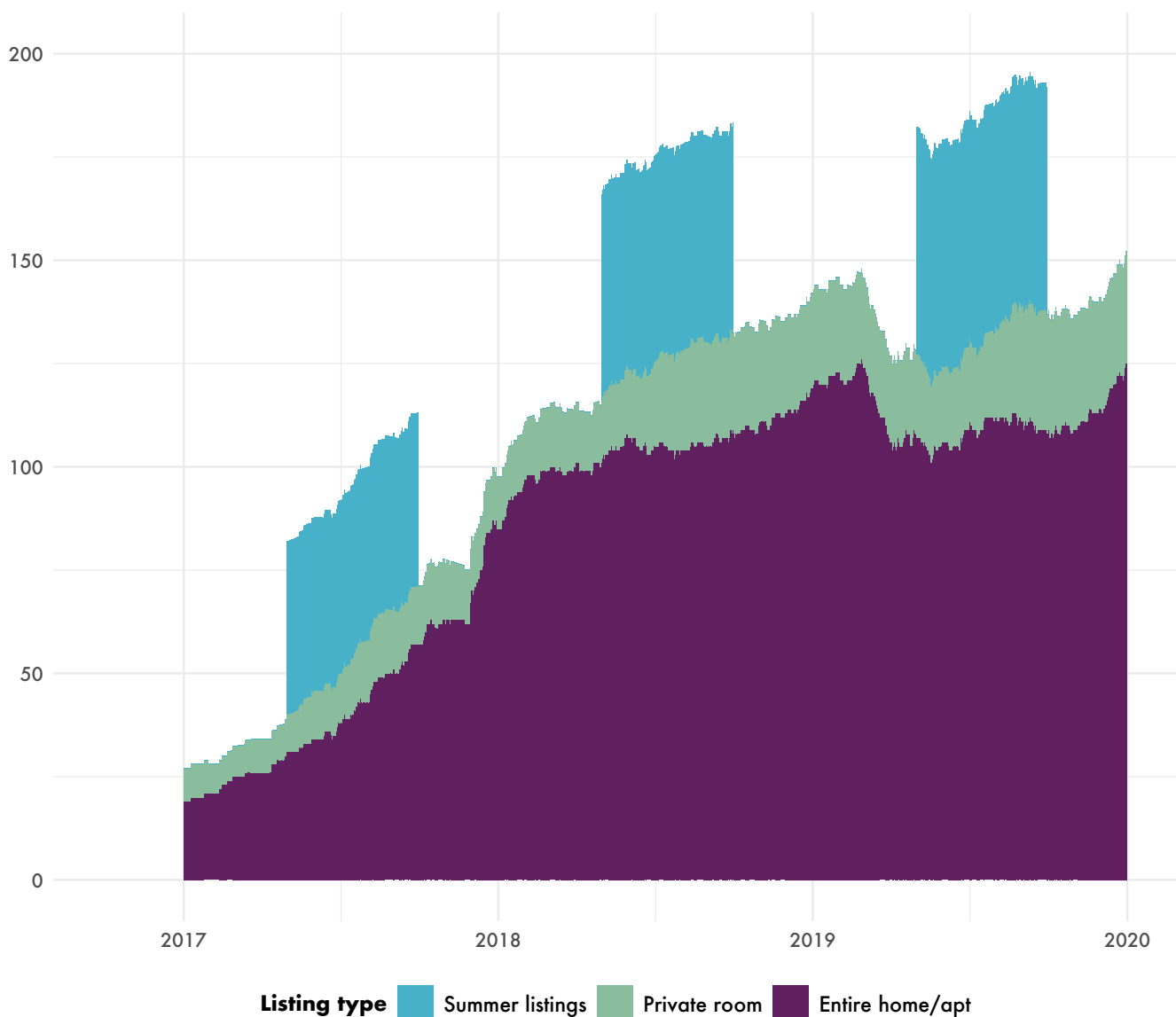


Figure 5: Housing units converted to dedicated STRs in the City of Charlottetown

RENT INCREASES

The growth of STRs in Charlottetown has effectively shrunk the size of the local rental market, by converting housing units which otherwise could house residents into tourist accommodations. And by offering a new revenue stream to homeowners and potentially some tenants who are willing to become part-time home sharers, STRs have increased the economic value of residential properties. Both phenomena would be expected to increase housing costs, since there is less available housing stock, and since the economic potential of the existing stock is increased.

No empirical research exists in a Canadian context to evaluate the impact of STR growth on housing prices or rents, but a US study¹ answered these questions through an examination of every US Airbnb listing between 2012 and 2016. This study found that a 1% growth in STR listings in a location predicts a 0.018% increase in monthly rents and a 0.026% increase in house prices. While these numbers appear small, they are being multiplied by STR listing growth rates which have been quite

high, so the authors find that the growth of Airbnb is responsible for one fifth of all rent growth and one seventh of housing price growth in the United States during the study period.

Relying on the fact that this model was developed taking into account an extremely wide range of locations, we can apply the average values of their model to the Charlottetown housing market to obtain a rough estimate of the impact which STR growth in Charlottetown has had on residential rents. Doing so suggests that, over the 2017-2019 period, STRs have been responsible for a 2.8% increase in average monthly rents in the city. Since rents have risen 7.5% in Charlottetown in this time period, this implies that more than a third (37.7%) of all rent increases over the last three years have been caused by the growth of STRs. Put differently, the growth of STRs has cost the average Charlottetonian renter \$292 since 2017. To be clear, this estimate comes with a high level of uncertainty, since it applies average parameters from a model developed in the United States.

CHARLOTTETOWN HOUSING MARKET TRAJECTORY

After five years of tightening, Charlottetown's rental housing market experienced a reversal in 2019, as the vacancy rate increased from 0.2% to 1.2%. This increase is attributable in large part to the city's rapid rate of rental housing completions since 2018. This raises the question of whether Charlottetown's recently positive rental market trajectory should be expected to continue, and to what extent the short-term rental market will interact with the overall housing market trajectory.

Relying on governmental data alongside our own STR data, we project three years of the

Charlottetown rental market, using housing supply and demand to estimate the rental vacancy rate both in the presence and absence of regulations of STRs. We make the following assumptions:

- Rental housing demand growth remains constant. The last several years has seen occupied rental units grow by approximately 2% per year, and we assume this trend continues.
- Supply growth follows existing trends, taking into account housing market starts and CMHC's supply growth projections.

¹ Barron, Kyle and Kung, Edward and Proserpio, Davide, The Effect of Home-Sharing on House Prices and Rents: Evidence from Airbnb (January 22, 2020). Available at SSRN: <https://ssrn.com/abstract=3006832> or <http://dx.doi.org/10.2139/ssrn.3006832>

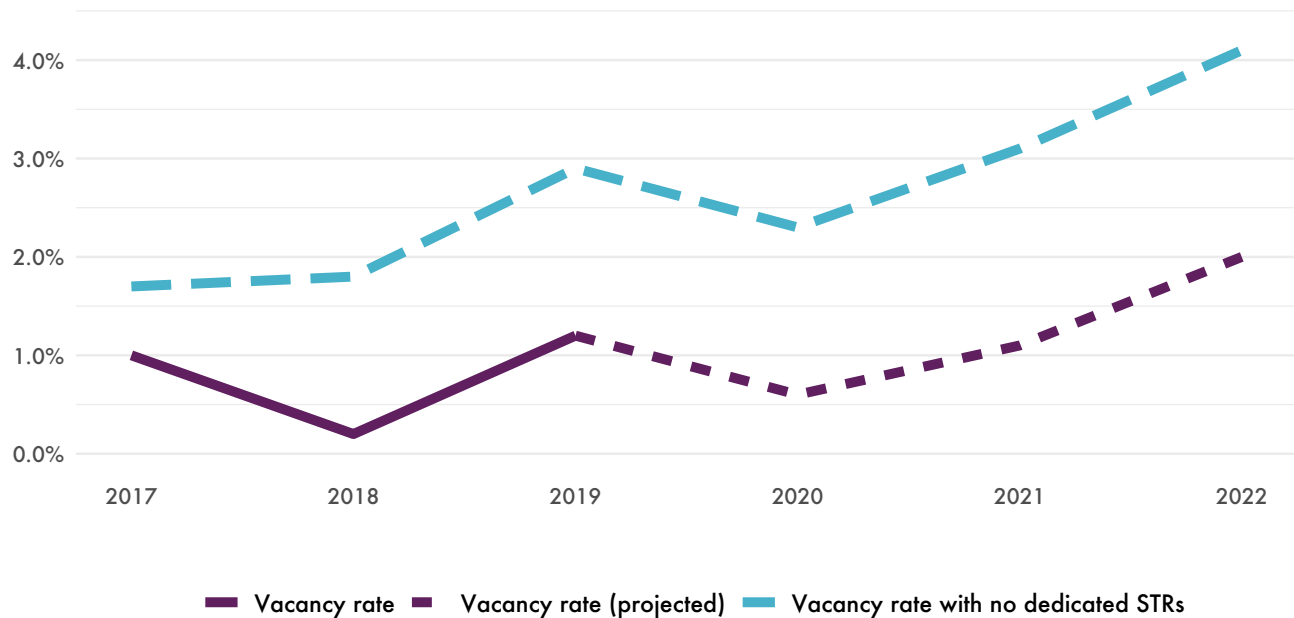


Figure 6: Actual and projected rental vacancy rates in the City of Charlottetown

- STR market growth continues along its current trajectory. The number of units converted to dedicated STRs grew approximately 10% between 2018 and 2019, and we assume that, in the absence of any regulatory intervention, this growth will continue.
- Dedicated STR units which were to be returned to the long-term housing market would enter the rental market at the same rate as new construction. Three in five new housing unit completions in Charlottetown is a rental unit, and we assume likewise that three in five dedicated STRs converted back to long-term housing would become long-term rentals.

Our projections can be found in Figure 6 and Table 6. We expect that the 2019 loosening of the rental market in Charlottetown will be partially reversed in 2020. A major cause of the loosening was the arrival of approximately 150 new rental units on the market in 2019, and we expect to see a smaller supply expansion next year (100 units), alongside a further expansion of dedicated STRs (15 units). After 2020 we expect to see a

resumption of the loosening of the rental market, as the 2017-2019 boom in rental housing starts comes on to the market. We estimate that, if there were no dedicated STRs operating in Charlottetown, the city would currently be on the threshold of the 3% rental vacancy rate generally considered the minimum for a healthy rental market. Our projections suggest that, in the context of current rates of supply and demand growth, and continued expansion of dedicated STRs, the rental vacancy rate will instead remain well below 3% for the foreseeable future.

Year	Rental vacancy rate	Rental vacancy rate with no dedicated STRs
2017	1.0%	1.7%
2018	0.2%	1.8%
2019	1.2%	2.9%
2020	0.6% (projected)	2.3%
2021	1.1% (projected)	3.1%
2022	2.0% (projected)	4.1%

Table 6: Actual and projected rental vacancy rates

3. Home sharers and commercial operators

Approximately half of Charlottetown STR listings are “multilistings”, which means they are operated by hosts who operate two or more entire-home listings or three or more private-room listings. We estimate that 46% of listings are not being operated out of their hosts’ principal residences, and that these commercial operations were responsible for 60% of STR nights reserved in 2019.

MULTILISTINGS AND PRINCIPAL RESIDENCES

An important distinction for understanding the structure of an STR market is the distinction between casual STRs (“home sharing”) and dedicated STRs (“commercial operations”). We previously examined revenue distribution among STR hosts as one way to identify commercial operators, but a more direct method is to find hosts who operate multiple listings. To take the simplest case, by definition a host with two or more entire-home listings cannot be operating both listings out of their principal residence.

We therefore define a “multilisting” as any listing operated by a host who is simultaneously operating other listings in such a manner that the listings cannot all be located at the host’s principal residence. If a host has two or more entire-home listings active on the same day, those are multilistings. We likewise identify private-room multilistings in cases where a host has three or more private-room listings operating on the same day. Since 87% of entire-home listings have three or fewer bedrooms, there will be extremely few

cases where a host operating three private-room STR listings in a dwelling unit has not converted that unit into a dedicated STR operation.

On September 1, 2019, 51.6% of active listings in Charlottetown were multilistings, and these listings earned 54.6% of total host revenue. Figure 7 demonstrates that half of both active listings and host revenue in Charlottetown belonged to multilistings in 2019, and that both of these proportions have increased since 2017. These figures should be taken as absolute minimums, since many commercial operators split their listings across several Airbnb or HomeAway accounts, and their listings would therefore be erroneously counted as non-commercial. Moreover, many STR commercial operators only operate a single listing, but operate it on a full-time basis. A house owner with a secondary suite, or the owner of an investment condo who operates an STR in it, are clearly commercial operators running listings which are not their principal residences, but they would not be counted by this method.

HOW MANY STR LISTINGS ARE OPERATED OUT OF A PRINCIPAL RESIDENCE?

We additionally calculated a principal residence field in order to identify those listings which are or are not operated in their hosts’ principal residence, and therefore, may not be caught with

the multilisting distinction described above. Principal residence status is estimated based on listing type, as well as how frequently the listing is rented and if it also a multilisting or not. Entire-

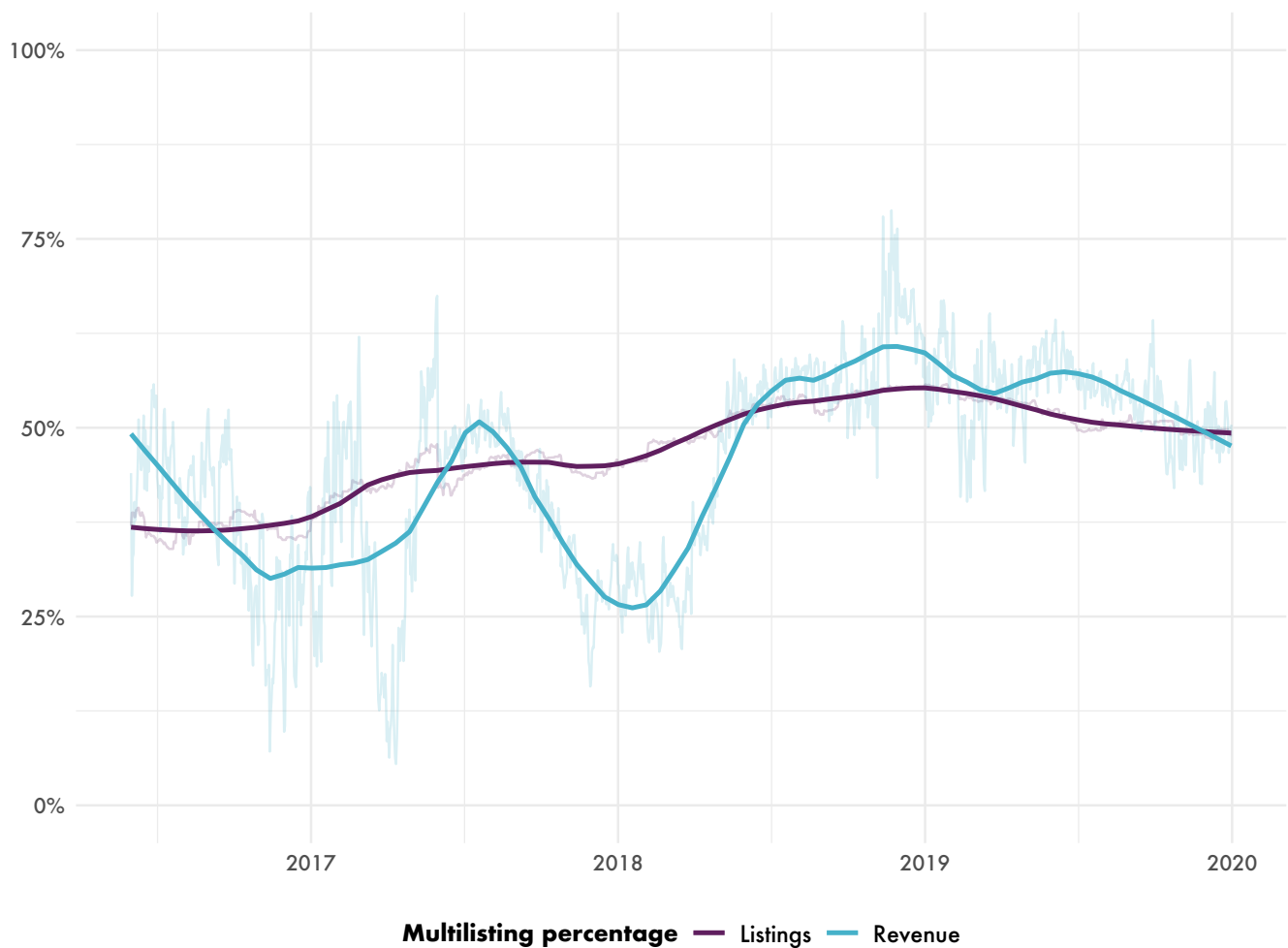


Figure 7. The percentage of total listings and revenue accounted for by multilistings in Charlottetown

home multilistings will, with one important exception, by definition violate the principal residence requirement, since a person cannot claim multiple homes as their principal residence. Of the 635 STR listings active on September 1, 2019, there were 261 entire-home multilistings. However, it is possible that a host rents out their own principal residence occasionally while also operating additional entire-home listings, so we conservatively assume that the least frequently rented entire-home multilisting is in fact the host's principal residence. We then add the FREH listings which were not already included in the list of multilistings and the private-room listings located

in ghost hostels. In total, of the 635 active STR listings on September 1, 2019, 342 (53.9%) listings were likely operated in their hosts' principal residences. This means that just under half (46.1%) of listings active on that date were operated out of non-principal residences. The revenue earned from those listings in 2019 totalled \$5.1 million—60% of total host revenue. Figure 8 shows the location of STR listings in Charlottetown by principal residence status. It demonstrates that principal residence STRs tend to be located throughout the city, while non-principal-residence listings are more heavily concentrated in and around the 500 Lot Area.

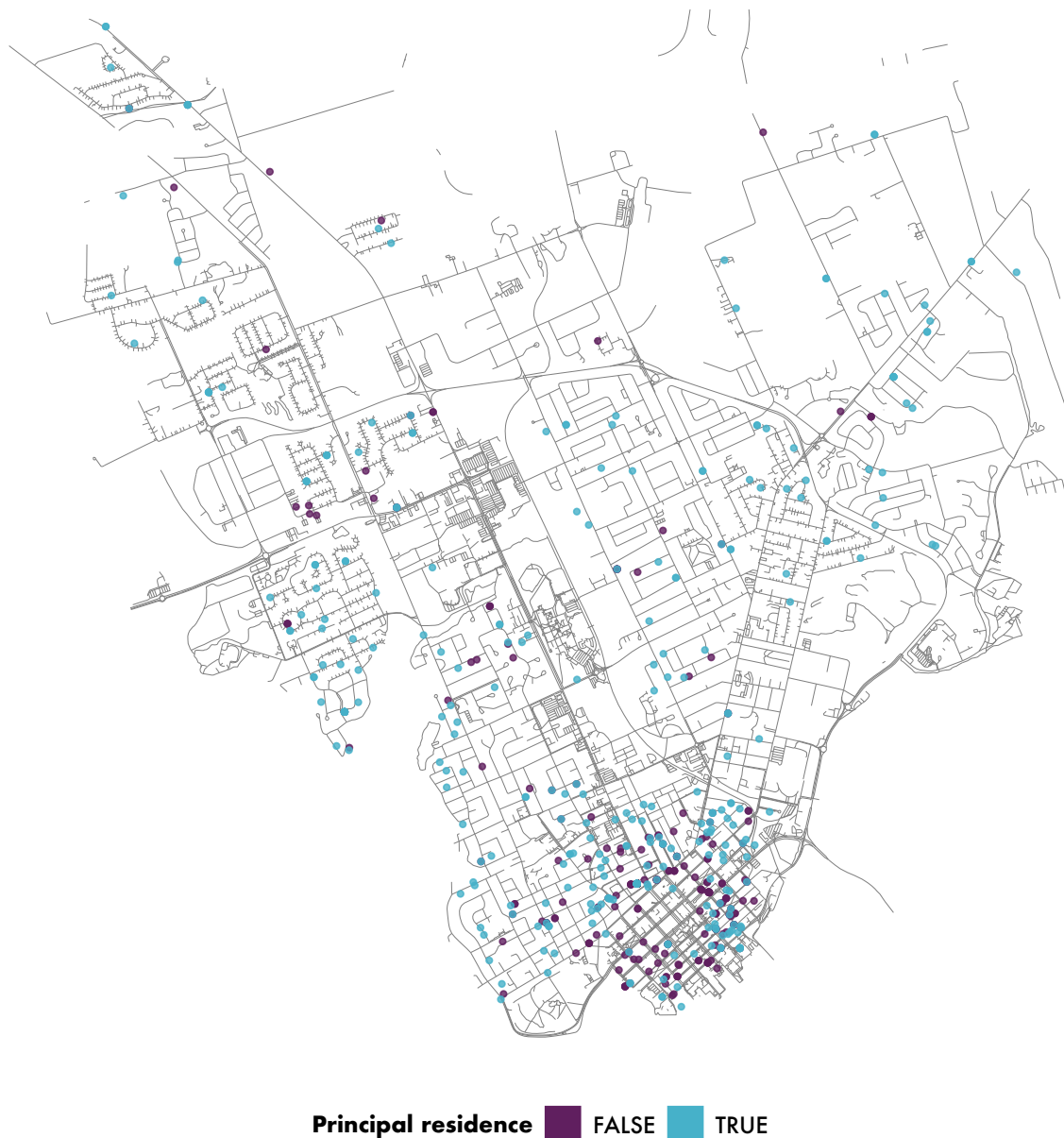


Figure 8. The location of Charlottetown STRs by principal residence status

HOW MANY NIGHTS ARE BOOKED IN PRINCIPAL RESIDENCE LISTINGS?

While we believe that most active STR listings in Charlottetown are being run in the host's principal residence, commercial operations are, by their nature, likely to be booked more frequently. In fact, while principal residence listings were 59.6% of all the listings active at any point during 2019, they only were responsible for 40.9% of reserved nights during the year. These numbers have declined considerably since 2017, when principal-

residence listings were 66.4% of all active listings and were responsible for 49.6% of bookings.

This trend indicates that not only has Charlottetown's STR market become increasingly dominated by commercial operators over time, but also that there is recent historical precedent for the market hosting proportionately more home sharers than is currently the case.

4. Regulatory scenario modelling

We evaluate five scenarios for regulating STRs in Charlottetown, which range from banning all non-principal-residence and apartment listings to limiting non-principal-residence listings to commercially and mixed-use zoned neighbourhoods. The scenarios would permit between 48 and 61% of current listings to continue to operate unimpeded, would return between 50% and 90% of lost housing units to the long-term market, and would all significantly improve the rental vacancy rate. To address the possible STR supply shortfall which would result from each of the scenarios, 219 to 306 new listings and 22.4 to 30.0 additional nights booked per listing, would be required if the City achieved 100% regulatory compliance. Those ranges fall to 104-144 listings and 11.5-15.6 nights for a compliance rate of 50%.

OVERVIEW OF SCENARIOS

To aid in the development of empirically informed policy development, we now model the impacts of five different scenarios for regulating STRs in Charlottetown. These scenarios combine different approaches to allowing or restricting STRs based on whether they are operated in a host's principal residence, based on the building type (house or apartment), and based on the land-use zone where the listing is located. The five scenarios are:

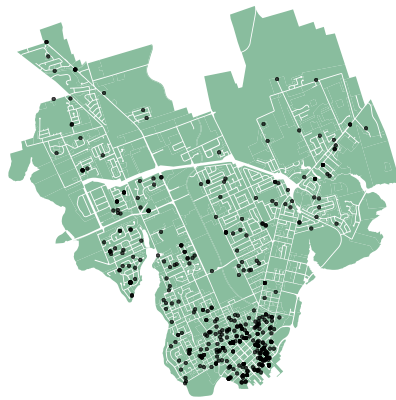
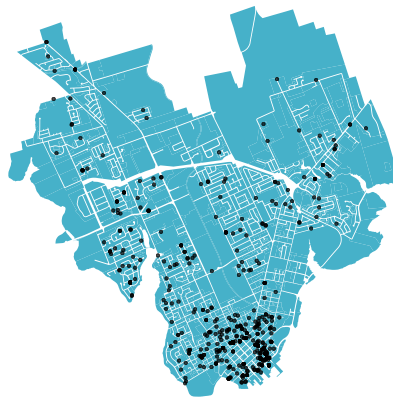
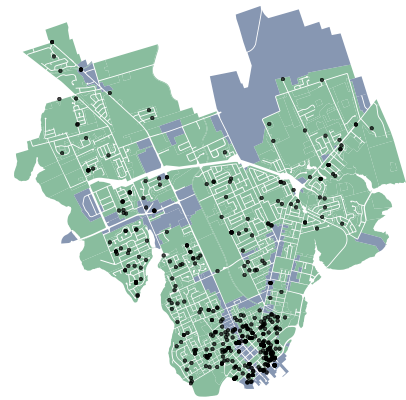
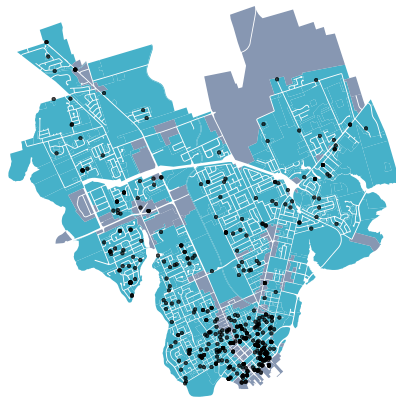
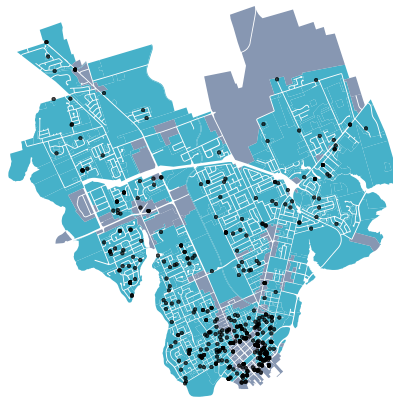
1. Permitting STRs in any principal residence except apartments, with no allowance for commercial STRs.
2. Permitting STRs in any principal residence including apartments, with no allowance for commercial STRs.
3. Permitting STRs in any principal residence except apartments, and only allowing commercial STRs in zones that permit a hotel or hostel.
4. Permitting STRs in any principal residence including apartments, and only allowing

commercial STR in zones that permit a hotel or hostel.

5. Permitting STRs in any principal residence including apartments, and only allowing commercial STR in zones that permit a hotel or hostel, as well as the Downtown Mixed Use Neighbourhood (DMUN) Zone.

These scenarios generally range from more restrictive (Scenario 1) to less restrictive (Scenario 5), and each imply different impacts on STR supply and the Charlottetown housing market. The spatial impact of the scenarios, with the location of active STR listings shown for reference, is indicated in Figure 9.

Before evaluating the possible future impacts of the five scenarios, we begin by specifying how they would affect currently active STR listings. Table 7 shows the percentage of active listings on September 1, 2019 which would continue to be permitted in each scenario, as well as the percentage of all nights reserved in 2019 which occurred in listings permitted in the scenario.

Scenario 1**Scenario 2****Scenario 3****Scenario 4****Scenario 5****STRs allowed**

- Principal residence only, no apartments
- Principal residence only, apartments allowed
- Commercial operations allowed

Figure 9. STRs allowed in Charlottetown under five regulatory scenarios

Scenario	% of current active listings which would still be allowed	% of 2019 reserved nights which would have been allowed
Scenario 1: Principal residence only, no apartments	47.6%	34.8%
Scenario 2: Principal residence only, apartments allowed	53.9%	39.8%
Scenario 3: Principal residence only, no apartments, but commercial zones allowed	52.4%	40.3%
Scenario 4: Principal residence, apartments allowed, and commercial zones allowed	57.3%	44.1%
Scenario 5: Principal residence, apartments allowed, commercial and DMUN zones allowed	60.9%	49.2%

Table 7. Percentage of existing listings and booking which would be permitted under five regulatory scenarios

The regulatory scenarios produce a range of outcomes with respect to how much of the current STR market would be allowed to continue to operate. However, all scenarios imply fairly large portions of current STRs being disallowed—between 39.1% and 52.4% of listings, which accounted for between 50.8% and 63.2% of nights booked in 2019. Scenario 5, which permits commercial operations in the widest area of the city and allows STRs in apartment buildings, would allow for the highest percentage of listings to continue to be permitted (60.9%, or 387 of the active listings on September 1), while Scenario 1, which prohibits all commercial operations and additionally prohibits listings in apartment buildings, would permit the fewest (47.6%, or 302 of the active listings on September 1).

One reason the scenarios all produce fairly similar results in terms of their impacts on the

current STR market is that relatively few listings currently operate in zones which would allow commercial operations in some of the scenarios (see Figure 9, above). Even though the density of non-principal-residence listings is higher in commercially zoned areas than in other areas of the same wards (see Figure 10 below, for more analysis), these zones are relatively circumscribed, and so a majority of existing listing operate in zones which would allow STRs only in principal residences (apartments or no apartments). Therefore, allowing commercial STR operations in commercial zones would have a noticeable but not major impact on existing STRs. As we explore below, however, allowing commercial operations in parts of the city with currently low numbers of STRs would have more significant impacts on how the STR market would evolve in the future under different regulatory scenarios.



HOUSING MARKET IMPACTS

We estimated above that in 2019 an average of 138 housing units were serving as dedicated STRs and thus had been removed from the long-term housing market. Each of the five regulatory scenarios would have an impact on those units, since each is a commercial operation which would only be permitted in specific locations under specific scenarios.

Under scenarios 1 and 2, no commercial operators would be permitted in Charlottetown, so the entire remaining STR market would be served by home sharers offering listings in their principal residence. Below we model how the supply of short-term rentals could be expected to change under such circumstances. However, under scenarios 3 through 5, commercial operations



Figure 10. The percentage of units in residential and commercial zones converted to dedicated STRs

Ward	Dedicated STRs as % of housing in residential zones	Dedicated STRs as % of housing in commercial and DMUN zones
Beach Grove	0.1%	1.0%
Belvedere	0.1%	0.7%
Brighton	0.1%	3.7%
Falconwood	0.1%	3.0%
Highfield	0.1%	0.6%
Mount Edward	0.1%	2.4%
Queen Square	0.1%	0.2%
Spring Park	0.1%	0.2%
St Avards	0.1%	0.3%
Stonepark	0.1%	0.1%

Table 8. The percentage of units in residential and commercial zones converted to dedicated STRs

would be permitted in specific parts of the city which are zoned to allow hotels and hostels (all three scenarios) or which are part of the Downtown Mixed Use Neighbourhood zone (scenario 5). Under these scenarios, we expect a proportion of commercial STR operations previously operating in areas where they would now be prohibited to relocate to the allowed areas. (In some cases existing proprietors might purchase or rent new units to replace their old ones, and in other cases new proprietors would enter the market to meet the new demand.) Figure 10 shows the percentage of housing which has been converted to dedicated STRs in the commercially zoned and non-commercially zoned areas of each ward. In each case, commercially zoned areas have higher rates of conversion to dedicated STRs. (Totals for each ward are summarized in Table 8.) This figure includes the DMUN zone, corresponding to scenario 5, but the results are the same under the slightly more restrictive conditions of scenario 3.



For the purposes of assessing housing market impact, we here make the assumption that commercial operations would relocate from the prohibited to the allowed portions of each ward, until the commercially zoned areas of each ward eventually host 50% more commercial operations than they currently do, in per-dwelling terms. In effect, we assume that there exists additional capacity for dedicated STRs in commercially zoned areas, and that prohibiting dedicated STRs elsewhere in the city would incentivize the activation of this capacity. (We apply the same calculations to the intensive summer listings which are operated through the summer high season but not otherwise year round.)

Incorporating this assumption, our analysis finds that the different regulatory scenarios could be expected to return between 50 and 90 percent of dedicated STRs to the long-term housing market. Scenario 1 would return the highest percentage of rental units converted to STRs in 2019 back to the housing market (90.3% or 125 units), followed by Scenarios 2 (88.4% or 122 units), 3 (63.0% or 87 units), and 4 (62.3% or 86 units). Scenario 5 would return the lowest percentage (50.0% or 69 units) dedicated to STR in 2019 back to the

market. Because private-room ghost hostels are by definition commercial operations, they would only be allowed to operate in the appropriate zones under scenarios 3, 4, and 5 (12, 12, and 13 respectively). An additional 55 units were identified as operating as seasonal full-time STRs between May 1 and September 30. Under the five scenarios, the number of those seasonal full-time units that would return to the long-term market ranges from 17 units (30.9%) under Scenario 5 to 39 units (70.9%) under Scenario 1 (Table 9).

Although scenarios 1 and 2 prohibit all commercial operations, our analysis shows small percentages of dedicated STRs continuing to operate under these scenarios. This reflects the fact that our estimates are based on the long-term trajectory of listings on the market, which in some cases are being rented casually for a stretch of months and then switch to full time for another stretch of months. The 9.7% of dedicated STRs that we estimate would remain on the market even under scenario 1, where all commercial operations are prohibited, thus recognizes the fact that individual listings will in some cases exhibit activity patterns that strongly resemble dedicated STRs (and thus remove housing from the long-

Scenario	Housing units returned to the long-term market (% of total)	Summer units returned to the long-term market (% of total)
Scenario 1: Principal residence only, no apartments	125 (90.3%)	39 (70.9%)
Scenario 2: Principal residence only, apartments allowed	122 (88.4%)	36 (65.5%)
Scenario 3: Principal residence only, no apartments, but commercial zones allowed	87 (63.0%)	30 (54.5%)
Scenario 4: Principal residence, apartments allowed, and commercial zones allowed	86 (62.3%)	28 (50.9%)
Scenario 5: Principal residence, apartments allowed, commercial and DMUN ones allowed	69 (50.0%)	17 (30.9%)

Table 9. Housing units returned to the long-term market under five regulatory scenarios

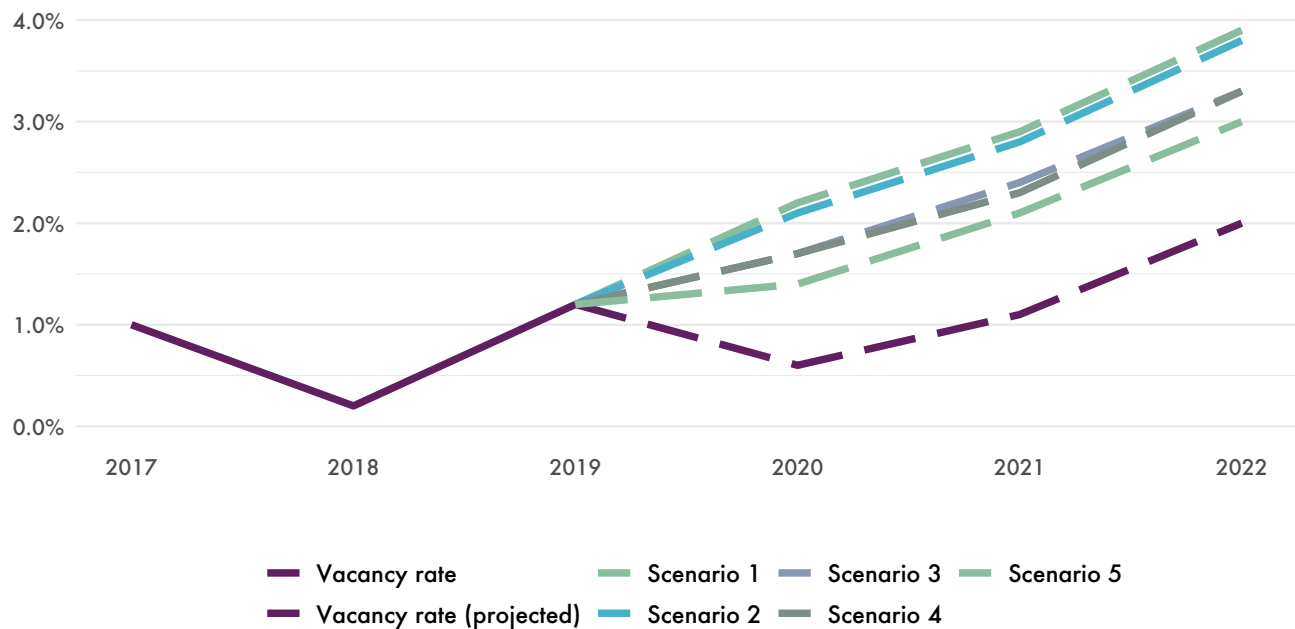


Figure 11: Actual and projected rental vacancy rates under five regulatory scenarios

Year	Rental vacancy rate (baseline)	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5
2017	1.0%	-	-	-	-	-
2018	0.2%	-	-	-	-	-
2019	1.2%	-	-	-	-	-
2020	0.6% (projected)	2.2%	2.1%	1.7%	1.7%	1.4%
2021	1.1% (projected)	2.9%	2.8%	2.4%	2.3%	2.1%
2022	2.0% (projected)	3.9%	3.8%	3.3%	3.3%	3.0%

Table 10: Actual and projected rental vacancy rates under five regulatory scenarios

term market) even when they are being operated by the legal principal resident.

In Section 2, we presented two projections for the rental vacancy rate in Charlottetown—one under business as usual, and one where all dedicated STRs were removed from the market. We now supplement that table by estimating the trajectory of the rental vacancy rate under the five regulatory scenarios (Figure 11 and Table 10). As with the

vacancy rate estimations above, these numbers reflect a high level of uncertainty about the underlying trends (e.g. the local economy could go into recession, or international immigration could experience a renewed boom), and thus should be treated as points of comparison to evaluate the relative impacts of the different scenarios, as opposed to definitive statements of how Charlottetown's housing market will evolve over the next several years.

STR SUPPLY IMPACTS

Each of the five regulatory scenarios we are exploring implies the removal of a substantial number of existing STR listings, because they are non-principal-residence operations, because they are located in an apartment building, or because they are not in a commercially zoned area of the city. It is important to explore, therefore, the extent to which the remaining portions of the market would be able to meet tourism demand if non-conforming listings were taken offline.

To begin with, we can estimate the potential shortfall in supply which would result from a large number of listings being removed from the market. In 2019 there were 56,700 nights reserved on STR platforms in Charlottetown housing units, split between the 834 listings which were active at some point in the year. If each of the five regulatory scenarios had been active through 2019, a portion of those listings would not have been permitted to operate, and therefore a portion of reserved nights would not have been able to occur. The precise numbers are 36,400 (scenario 1), 33,500 (scenario 2), 33,500 (scenario 3), 31,200 (scenario 4), and 28,400 (scenario 5). These figures are expected shortfalls in STR reservation nights, assuming that no changes in the activity of remaining listings occur, and that new STR listings are established to take

advantage of the decrease in supply. Both of these assumptions are of course highly unrealistic, but point to two possible ways that the STR supply shortfall would be addressed.

For remaining hosts to make up the shortfall with no new hosts being added, the remaining listings would each need to increase their annual nights booked. The number of average nights booked in 2019 among listings which remain legal under the five scenarios varies between 46.2 (scenario 1) and 52.1 (scenario 5). Taking into account the total 2019 shortfall, existing hosts would each need to add between 52.4 (scenario 5) and 83.2 (scenario 1) additional booking nights on average.

The fact that remaining listings would need to at least double their annual nights booked to make up the potential shortfall in STR supply indicates that, on its own, this is not a plausible route to the shortfall being addressed. Most obviously, if existing listings increase their average annual nights booked to over 120 nights, they would reach a status of full-time activity that would be inconsistent with their being operated by a principal resident. Another possibility is that new listings will be created to make up the shortfall. If new listings were added at the same average number of nights booked per listings as the

Scenario	Annual shortfall of reserved nights	Remaining listings	Avg. nights booked per listing	Avg. increase in nights booked required to fill shortfall (% increase)	New listings required to fill shortfall (% increase)
Scenario 1	36,400	438	46.2	83.2 (180.1%)	788 (180.1%)
Scenario 2	33,500	497	46.6	67.4 (144.6%)	719 (144.6%)
Scenario 3	33,500	469	49.4	71.4 (144.5%)	678 (144.5%)
Scenario 4	31,200	519	49.1	60.1 (122.4%)	635 (122.4%)
Scenario 5	28,400	542	52.1	52.4 (100.6%)	545 (100.6%)

Table 11: Actual and projected rental vacancy rates under five regulatory scenarios

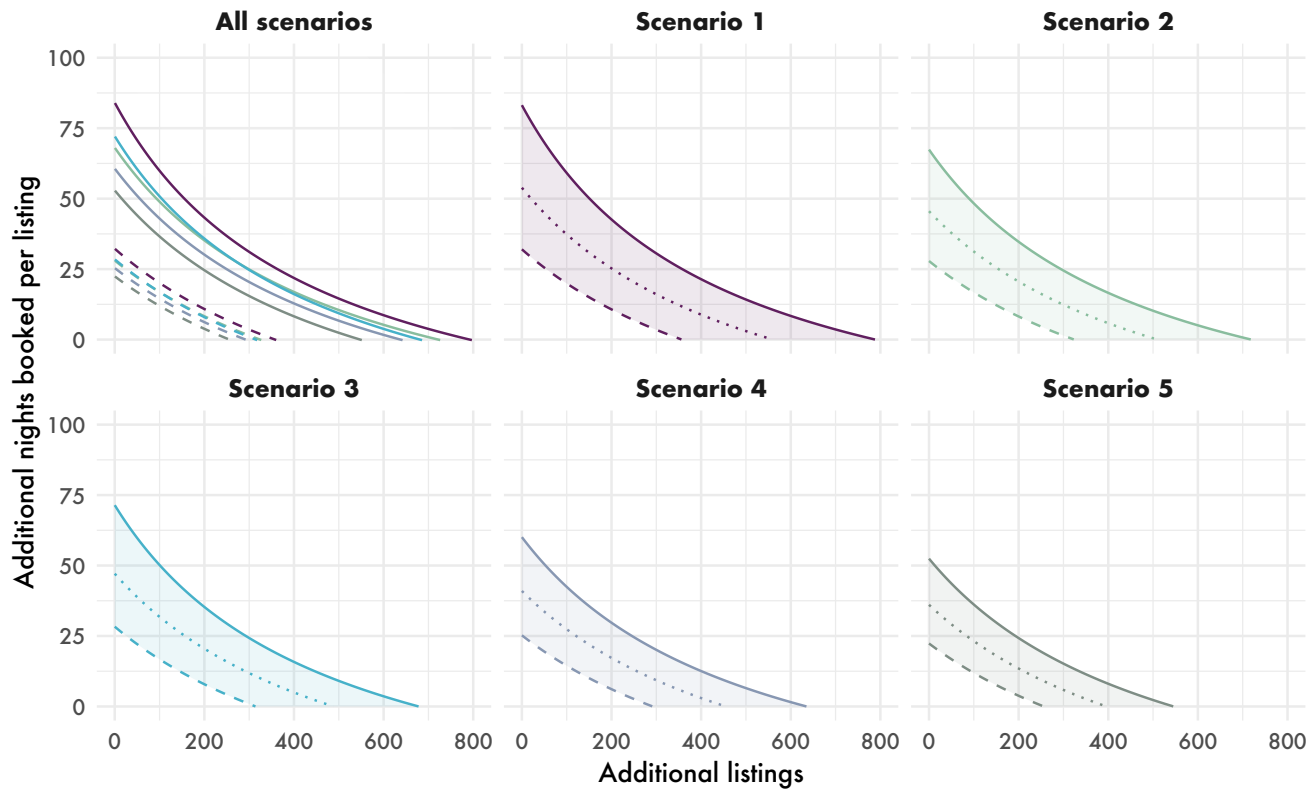


Figure 12: Additional listings or nights booked needed to make up STR supply shortfall under five scenarios.
Solid line = 100% compliance; dotted line = 75% compliance; dashed line = 50% compliance

remaining listings under each scenario, between 545 (scenario 5) and 788 (scenario 1) new listings would be required to address the supply shortfall. These possibilities are summarized in Table 11.

In practice, the numbers of either additional booked nights or additional new listings are relatively implausible on their own in most scenarios; a more likely outcome is that the supply shortfall is addressed through a combination of the two mechanisms. Additionally, the modelling we have done assumes a 100% regulatory compliance rate, which is highly unlikely. The City of Vancouver's STR registration system, which is highly resourced and has been a local political priority, has a compliance rate of approximately 75%. Registration schemes with minimal attempts at strict enforcement, such as the system put in

place by the Province of Québec in 2015, have seen compliance rates in the single digits. If Charlottetown achieves a similar rate, the number of new listings or additional nights booked to address a supply shortfall would shrink substantially. Figure 12 shows the different combinations of additional listings, changes to average nights booked, and regulatory compliance which would address the supply shortfall under all scenarios. For each scenario, the shaded region represents combinations of additional listings and additional nights booked which would address a potential STR supply shortfall at regulatory compliance rates between 50% and 100%. The figure demonstrates that in each scenario there are modest combinations of additional listings and additional nights booked which would address the supply shortfall, particularly if the regulatory compliance rate is assumed to be less than 100%. For example, at a

Scenario	100 % compliance rate		75% compliance rate		50% compliance rate	
	Minimal additional listings	Minimal additional nights booked	Minimal additional listings	Minimal additional nights booked	Minimal additional listings	Minimal additional nights booked
Scenario 1	306	30.0	224	22.8	144	15.6
Scenario 2	267	27.6	196	21.0	128	14.1
Scenario 3	275	26.8	200	20.5	129	13.9
Scenario 4	244	25.2	179	19.1	117	12.9
Scenario 5	219	22.4	160	17.1	104	11.5

Table 12: The most efficient combinations of additional nights booked and additional listings required to make up STR supply shortfall under five regulatory scenarios at 100%, 75% and 50% compliance rates

75% compliance rate, under all scenarios the supply shortfall could be met with roughly 200 new listings and between 10 and 25 additional average nights booked.

Table 12 provides the combination which minimizes both additional nights and additional listings at 50%, 75% and 100% compliance rates for each scenario. In other words, assuming 100% compliance with scenario 1 (where all commercial operations are successfully banned—the strictest conditions we modelled), 306 additional listings and 30 additional average nights booked would together make up the supply shortfall which would otherwise result from that scenario being enacted. Likewise, assuming 50% compliance with scenario

5 (where commercial operations are permitted in many parts of the city and many non-permitted operations manage to stay in operation—the laxest conditions we modelled), 104 additional listings and 11.5 additional average nights booked would together make up the supply shortfall.

Such increases are not dramatically out of line with underlying STR growth trends in Charlottetown, particularly in the 2017-2018 high-growth period. The results of this scenario modelling thus demonstrate that there is relatively little risk of an adverse tourism accommodation supply shock occurring in the wake of stronger regulations on STRs in Charlottetown, even under the more restrictive scenarios being contemplated.



5. Host Compliance data analysis

The bulk of the analysis in this report has been conducted using a proprietary dataset combining high-frequency web scrapes of Airbnb and HomeAway performed by the consulting firm AirDNA with additional extensively customized code produced by UPGo at McGill. This fact raises the question of to what extent the City of Charlottetown will be in a position to replicate the analysis in the future, which will become particularly important in

the context of enforcing future regulations. While the City does not have access to the AirDNA data used in this analysis, it does have access to an STR dataset compiled by the consulting firm Host Compliance. Accordingly, we now briefly discuss the overlap between the Host Compliance data and the UPGo/AirDNA data, and then describe which aspects of the analysis in this report could be feasibly replicated using the Host Compliance data.

LISTING COVERAGE COMPARISON

The listing coverage of the Host Compliance (HC) data and UPGo/AirDNA is very close, although the two datasets provide slightly different (and complementary) types of information about the listings they cover. The HC data provides actual street addresses for many listings and aggregates listings to individual hosts across many STR platforms, which should make it possible to identify commercial operators with a strong degree of confidence. The AirDNA data, by contrast, does not identify street addresses and is

limited to Airbnb, HomeAway and VRBO, although it contains precise estimates of daily activity which make it possible to assemble a detailed analysis of, e.g., listings which are operated on a full-time basis, and to track changes over time.

The UPGo/AirDNA dataset includes 1360 properties, 927 of which had some sort of activity in 2019. (Unlike the numbers presented earlier in the report, here we include non-housing listings for the sake of comparability with the HC data.) Of





these 927 properties, 739 were uniquely listed on Airbnb, 118 were uniquely listed on HomeAway/VRBO, and 80 were listed on both. This means that the dataset tracks 1007 online listings, which are aggregated into 927 properties.

The Host Compliance dataset contains 855 properties, 421 of which are identified as having had activity in 2019. These properties are not comparable to the UPGo/AirDNA numbers, since they aggregate all the listings which are present at a given address, while the UPGo/AirDNA dataset separates, for example, three private-room listings in a single house into three distinct entries. Disaggregated into individual listings, the Host Compliance dataset contains 1265 listings, 740 of which were active in the last year.

Of the 927 properties active in 2019 according to the UPGo/AirDNA dataset, 62 are not in the HC dataset. This means that the HC dataset has information about 93.3% of the properties tracked by AirDNA, and is missing information about the other 6.7%. Conversely, of the 421 properties

active in 2019 according to the HC data, 38 are not in the AirDNA dataset. Six of these are HomeAway properties which are no longer active, and four are Airbnb properties, two of which are active and two of which are not. The remaining 28 properties are listed on non-Airbnb and non-HomeAway platforms such as Booking.com, Tripping.com, and Expedia. However, only six of these properties have identified addresses, which means that the remaining 22 may be duplicates of Airbnb or HomeAway listings in the AirDNA dataset.

In sum, the UPGo/AirDNA dataset appears to include effectively every active Airbnb or HomeAway listing in Charlottetown (99.8%), but is missing between six and 28 listings operated exclusively on other platforms. The HC dataset, on the other hand, is missing 6.7% of Airbnb and HomeAway listings, but includes a number of listings operating exclusively on other platforms. The area of overlap between the two datasets is very high, and suggests that both datasets are independently reliable.

FEASIBILITY OF REPLICATING THIS ANALYSIS WITH HOST COMPLIANCE DATA

We have conducted three types of analysis in this report: a market overview of STR listings, an analysis of the housing-market impacts of STRs, and an examination of commercial operators and home sharers, which informed the regulatory scenario modelling. Our opinion is that the HC dataset should enable the first and third of these analyses to be accurately performed.

While the HC dataset lacks the detailed activity data which we rely on for some of our more analytically intensive market overview findings, the dataset has sufficient coverage to provide a reliable overview of the extent of the STR market, and enough temporal resolution to track changes over time. The HC dataset also provides an overview of commercial operators and home sharers which is comparable to that which we obtained with AirDNA data. (For example, the HC data identifies one third of listings as commercial multilistings. Our analysis only identifies an additional 15 percent of listings which are multilistings, which means that the HC data correctly identifies the majority of multilistings.)

However, because the HC dataset lacks detailed activity data, it cannot be used to conduct adequate housing-market impact analysis. Because the proportion of active STRs which are full-time operations taking housing off the long-term market has changed over time—and might be expected to change dramatically if new STR regulations are enacted—housing impacts can only be reliably assessed through measuring the actual activity patterns of individual listings.

Finally, and perhaps most importantly, it should be feasible to monitor questions relating to the supply of STRs and their regulatory compliance in Charlottetown using the HC data. Because HC aggregates listings to hosts and gives exact addresses in some cases, it will be possible to identify a relatively high proportion of the commercial operators operating multiple non-principal-residence listings. If the City enacts a regulatory scheme which limits these listings to certain geographical areas or building types, the HC data will prove valuable for monitoring compliance.





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ABOUT UPGO

UPGo, the Urban Politics and Governance research group at McGill University, conducts rigorous, public-interest research into pressing urban governance problems—particularly those that exceed or challenge city boundaries. UPGO has published numerous peer-reviewed journal articles and policy reports on short-term rentals in cities in Canada and around the world, including “Short-term rentals in Canada: Uneven growth, uneven impacts” and “The high cost of short-term rentals in New York City”. UPGO is led by Prof. David Wachsmuth, the Canada Research Chair in Urban Governance at McGill University’s School of Urban Planning, and is online at upgo.lab.mcgill.ca.



McGill



Attachment N

Technical Background Report: Regulating Short-term Rentals (STR's) in the City of Charlottetown

Planning & Heritage Department

Contact: planning@charlottetown.ca



Attachment N

1

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1.0 Executive Summary

Short-term rentals (STRs) are temporary overnight accommodations that are rented by the property owner or tenants for a period of less than 28 consecutive days. Over the past few years, the STR industry has grown considerably due to the popularity of online platforms such as Airbnb and VRBO. In the spring of 2019, Charlottetown City Council directed the Planning & Heritage department to undertake research, obtain public feedback and provide options on regulating short-term rentals (STRs) within the municipality. Key information in this report that responds to council's request includes:

- the results of public engagement from a community survey, media submissions, and a public open house that highlighted concerns with the impacts of STR's on property prices, rental housing stock, nuisances and the importance of STRs as a source of income for hosts;
- data collection methods that were used to understand the local STR industry;
- the results of a jurisdictional scan that stresses the importance of establishing a STR registry, licensing process and enforcement strategy in conjunction with consistent STR oriented land use planning policies and regulations; and
- discussion on the impacts of STRs on the availability and affordability of housing, neighbourhood nuisances and building and fire code compliance.

While the COVID-19 pandemic has reduced the current number and offering of STR listings, it is unclear how severe or long these impacts will last. Given the possible post-pandemic pent up travel demand and the relative ease of relisting a property on STR online platforms, staff has been directed to develop an effective strategy to regulate the STR industry. Proposed regulations within this report are concerned with housing availability, housing affordability, tourist health, public safety, land use compatibility at the neighbourhood scale, and the economic and social well-being of the municipality. The proposed regulatory framework has been designed to provide opportunities for residents to benefit from the STR economy while establishing appropriate measures that minimize the negative consequences of STR activities on housing, nuisance generation and disrupt community harmony.

2.0 Introduction

Over the last couple of years, the sharing economy (Air B&B, Uber, Lyft etc.) has rapidly emerged in the field of urban planning. As Uber and Lyft have made dramatic changes to the personal transportation industry, short-term rentals (STRs) platforms have made similar changes to the tourism industry. A short-term rental (STR) is when an entire home or a portion thereof, that is temporarily rented for less than 28 consecutive days at a time. The issue of short-term rentals has several different implications for residents, homeowners, long-term renters, and the tourism industry. To date, the STR industry in Charlottetown has been left unmanaged and unchecked, causing a proliferation of STRs in the community. This has generated concerns from residents about the potential effects STRs have had on land use compatibility within neighbourhoods and on the housing/rental market in terms of availability and affordability. In response to these land use issues and resident concerns, the Planning & Heritage Department were directed to prepare a report with the following components:

- establishing context of the local STR industry, its activity and associated impacts;
- outlining data collection methodologies and providing information obtained through public engagement (i.e. survey, media and an open house);
- completing a jurisdictional scan; and
- providing options based on best practices to regulate and license the STR industry.

This report offers options to Council for consideration regarding the potential development of a regulatory framework for STRs. The following background sections outline the characteristics of the local STR industry in the City of Charlottetown.

3.0 Background: City of Charlottetown, STR Industry, and Provincial Requirements

3.1 Municipal Context & Issues

The City of Charlottetown has experienced considerable growth over the last half decade that has placed additional pressure on the local housing stock. Based on Statistics Canada estimates from 2016 to 2020, the municipality's population has grown by 12.3% (Statistics Canada, 2021). Population growth has increased demand for housing which has resulted in an increase in

housing prices over the average income. In Charlottetown, this ratio increased from 2.29 to 2.94 (28.4%) due to a surge in housing prices (Statistics Canada, 2021). Prince Edward Island emerged with a dramatic rise in housing prices, from 2019 to 2020 the average price increase was 22%, the highest of any province in the country (CREA, 2021). In the local rental market a key indicator is the vacancy rate. Due to the above-mentioned growth pressures the housing market tightened substantially in 2018 with the vacancy rate dropping to 0.2% with a slight recovery to 1.3% in 2019 increasing to 2.9% in 2020 (**Figure 1 & 1A**) (CMHC, 2021). With the drop-in vacancy rate and tightening supply of long-term rental accommodations there was a corresponding increase in rental prices. As an example, between 2018 and 2019, average rents for two-bedroom units in Charlottetown rose 2.9% and 2.7% respectively (CMHC, 2021). An STR provides greater potential for income generation, landlords may be incentivized to remove tenants to facilitate renovation, list property on STR platform or sell the property. Housing advocates have been vocal about what has been called a renoviction process, which displaces tenants for no other reason than the landlord's desire to capitalize on low vacancy rates.

3.2 Short-Term Rentals (STRs) in Charlottetown

The rise of the sharing economy, in the rental housing market – the use of online platforms (i.e. Airbnb, VRBO, HomeAway) in a peer-to-peer format has provided the convenience and means for any property owner to rent their entire dwelling or a portion thereof, out to anyone for any length of time. These types of private residential listings have provided choice to people who might not want to stay at more traditional accommodations in the form of hotels, motels, and bed & breakfasts lodgings. However, the STR industry has moved beyond hosts renting their entire or only a portion of their primary residence but now includes commercial operations where a single owner rents multiple properties either year-round or during the peak tourist season (i.e. May to September). The rapid growth of the STR industry has impacted the City of Charlottetown, for example, rising housing prices and rents specifically the issue of rental eviction.

The following summarizes the pre-pandemic characteristics and growth of STRs in the municipality based on information collected from Granicus/Host Compliance, a third-party 'data

scrapping' or scanning service that collects information on STR activity from online sharing platforms such as Airbnb.

- the number of STR private home listings in Charlottetown increased approximately 7.9% from 584 listings in September 2018, to 635 listings in September 2019;
- the city had the highest variation of seasonal listings with 70% of reserved nights occurring between May and September, which reflects the strong connection between STRs and tourism (**Figure 2**);
- STR listings are primarily entire home listings which made up 77% of active listings and earned 89% of all host revenue;
- the 409 hosts with private listings collectively made \$8.5 million in revenue in 2019 with the top host earning more than \$430,000 in 2019 and the median host revenue was \$19,300;
- the top ten percent of hosts earned nearly 47% of all STR revenue, which indicates an increase in commercialization of STR activity (**Figure 3**);
- the majority of STR listings are offered on the online platform Airbnb;
- the distribution of STR activity is concentrated in the downtown, 3 of every 5 STR listings located in the urban core (**Figure 4**); and
- suburban neighbourhoods saw some of the highest year-to-year STR growth with one ward experiencing a 200% growth rate in listings;

Note: The above information is based on data collected from 2019 activity and does not reflect the impact of the COVID-19 pandemic. It is important to note that the impact from the pandemic will be either short-lived or fundamentally alter STR trends in the municipality.

3.3 Existing Policies and Regulations in the City of Charlottetown

Municipal regulations presently allow for various types of tourist's accommodations that are related to the STR market, this includes hotels, motels, bed & breakfast, lodging houses and private dwellings. While the city by-laws does not specifically mention STRs, the current zoning regulations permit a resident to use their private dwelling, or a portion thereof, for a tourist accommodation under the condition that they apply and be approved as a home occupation and

upgrade the residence to meet building and fire code requirements through the permitting process. As per the Zoning & Development By-law regulations only a single-detached dwelling with a maximum of 4 bedrooms can be used as a tourist accommodation and the proprietor of the home occupation is required to live in the dwelling (i.e. owner's principle residence). Under existing enforcement regulations, it is difficult to charge a non-compliant property operating as an illegal STR. To proceed with enforcement of STR regulations first-hand evidence will be required, such as screen shots of posting a property for rent, not registered as a STR property, witness statements from a person that stayed at the property, neighbours or admission from the property owner.

3.4 Tourism Industry & Provincial Legislation

The tourism industry plays an important part in the provincial economy. On PEI, tourism provides 8,782 full time jobs for islanders and accounts for 6.2% of the province's total GDP bringing in approximately \$486.5 million in economic activity annually (TIAPEI, 2021). The local tourism industry benefits from the availability of alternative accommodation offered by STRs as it provides additional capacity to accommodate more tourists, increased spending on local businesses, and additional sources of revenue from tourism tax and/or licensing fees. As such the PEI Tourism regulates and licenses tourist accommodations (i.e. hotels, motels, bed & breakfasts) and in September 2018 the *Tourism Industry Act* was amended to include and define private residences offered on STR platforms (i.e. Airbnb, VBRO) as a tourist home. However, utilizing the STR listing data obtained from the scanning software and cross referencing it with PEI Tourism's licensed registry database, municipal staff determined that only 265 of the total 635 STR listings were registered. This means that more than half, of the total STR listings in Charlottetown, 370, are non-compliant with provincial legislation. There is also a concern with the way PEI Tourism has issued tourism licenses to operators/hosts without confirming approval with the municipality. This has resulted in both confusion and proliferation of non-compliant STR situations for numerous local operators/hosts.

4.0 STR Problem Statement & Issues

The problem statement that staff is attempting to address is:

What is the most effective strategy to regulate short-term rentals in a tourism-based municipality, such as Charlottetown, with a low vacancy rate?

The problem statement seeks to grasp how STRs impact the local housing market in terms of property sale and housing rental prices but still allows for flexibility to support the local economy. There is a correlation between the profitability of the STR market and the demand in properties. As STR profitability increases, so too does property demand. In Charlottetown, this is apparent in the urban core where properties and STRs are closer to amenities. Likewise, previous rental properties that would have been used for long-term rental switch to the short-term market thus inflating rent prices by decreasing available rental options. STRs contribute to the local economy but seeks specificity on how much it supports the economy. If vacancy rates are low and property values are high, a lack of affordable options could deter new industries, businesses, and permanent or prospective residents away from the municipality with low vacancy rates and high property prices (Wieditz, 2017). One U.S. study shows that a 1% increase in Airbnb listings leads to a 0.018% increase in rents and a 0.026% increase in house prices (Barron & Edward, 2020). An unregulated STR industry can lead to various negative consequences on the local housing market because of long-term housing being renovated, commercialized and permanently removed from the housing supply and being offered up on the STR market. The type of STRs that pose the biggest threat to reducing long-term housing supply are commercialized STRs, commonly referred to as Frequently Rented Entire-Home (FREH) listings. FREH listings are defined as entire-home listings that are offered on STR platforms for much of the year. This mass transition through commercialization of long-term dwellings converted to short-term rentals has affected the availability and affordability in the form of gentrification of Charlottetown's housing supply. Data indicates that the highest concentration of non-principle residence STR listings is occurring in the downtown but this appears to be expanding to more suburban areas of Charlottetown (**Figure 5**). In fact Charlottetown's STR industry is becoming more commercialized, in 2017 principle residence listings were 66.4% of all listings and consisted of 49.6% of all bookings, in 2019 principle residence listings dropped to 59.6% and only accounted for 40.9% of bookings (Wachsmuth, Basalaev-Binder, Belot, Bolt, & Seltz, 2020).

Residents who live in neighbourhoods with STRs have also complained about nuisance issues such as a rise of parking on quiet streets, excessive garbage, noise, and safety concerns with transient guests. The way that a STR operates, either the entire dwelling (absentee owner) or a portion of the dwelling (owner present) correlates with associated nuisance impacts on the neighbourhood (Wachsmuth, Short-term Cities: Airbnb's impact on Canadian housing markets, 2017). There are also instances whereby dwelling units are renovated to increase capacity without proper permits or approvals (Lee, 2016). This has brought up building and fire code safety compliance issues. Often owners that increase the occupant load have certain costly building upgrade requirements required under applicable by-laws and codes, such as, fire rating, wired smoke detectors/alarm, sprinklers, second means of egress (Lee, 2016). However, since STR platforms do not require listings to obtain proper approvals and they obfuscate the location of STR listings, this provides the ability for hosts/operators to “fly under the radar” and avoid building upgrades to meet current building/fire code regulation requirements.

5.0 Public Engagement & STR Data Collection

The following three data collection methods were and should be continued to be used post-regulation implementation and in the enforcement phase to obtain public opinion and review factual data on the local STR industry:

- 1) **Interactive Data Collection, Community Survey and Media Engagement:** General community survey to obtain public opinion and experiences with STRs. Questions on the surveys collected quantitative data through rankings and ratings while obtaining qualitative data through open ended or opinion questions in order to understand the impacts that STRs had on residents.
- 2) **Interactive Data Collection, Public Open House:** Due to the divisive and technical nature of STRs and their varied impacts on a municipality, staff then followed up with an open house to engage a wide range of stakeholders and residents to elicit their feedback on the STR issue.
- 3) **Archival Data Collection, Industry Statistics & Third-Party Scanning Tools:** Industry statistics such as current and historical rental and property price data have been used to

measure the impacts of STRs on the local housing market. Fluctuations in property values contrasted against the concentration of STRs by municipal ward uncovered how some areas in the municipality are more prone to commercialized STR operations and price inflation. Software programs that perform “data scraping” and scanning of STR listings from online platforms (i.e. Airbnb, VRBO, HomeAway) have provided the activity and characteristics of the local STR market. This data has been useful when determining the impacts that STRs have on the local housing market (i.e., how many dwellings are removed from long-term housing market, are STR becoming highly commercialized vs. home-sharing) and preparing an effective regulatory framework.

5.1 Survey & Media Engagement

To obtain community-wide opinion the city released a public STR survey and a call for public submissions through print and social media occurred in the spring of 2019. There were a variety of participants that included STR platforms, hosts/operators, local/provincial governments, housing and tenant advocates, homeowners, and other residents. The results of the survey identified the following issues as priorities for the community:

1. concerns expressed by residents and community organizations about the quality and safety of private sector rental housing and how the City addresses these issues.
2. growth of requests for service regarding property standards.
3. the emergence of short-term accommodation rentals (using on-line platforms such as Airbnb or Expedia) and possible impacts for private market housing availability and affordability, as well as health and safety, community nuisance, property standards and maintenance, and consumer protection considerations.
4. the call for fair regulations to even the playing field that are currently in place for licensed and appropriately zoned hotels, motels and traditional bed and breakfasts.

It is noted that many of the survey responses, between 66% to 80% of respondents had a favorable disposition of allowing STRs in some type of form or another. The relatively low number of respondents and type of feedback received, suggests that residents who took the time to respond had an interest in STRs, this could result in biases if this data alone were to be used to inform policy options. The questions outlined in the survey contained technical language (i.e.

principle residence, attached units, full time listing, home occupation) and presumed that participants had some knowledge of the STR industry and zoning regulations.

5.2 Public Open House

The last engagement with the public was conducted on May 17, 2021, via a public open house. Staff presented the quantitative data of STR activity pre-pandemic during 2019 when the industry was at its peak and some associated impacts to the local housing and rental markets. The goals of the open house were to:

1. Identify the main issues, concerns, and impacts related to short-term rentals;
2. Prototype five potential regulations for short-term rentals; and
3. Obtain the feedback from residents.

The first portion of the open house provided the implications and the subsequent impact of an unregulated STR industry (housing availability/affordability, community cohesion, building and fire codes safety). In the second half of the open house participants were provided five regulatory scenarios, and data on how these scenario regulatory options impacted municipal issues (housing, property rights, taxation, regulation etc.). Each of these scenarios permitted STR activity, with the most restrictive requiring owners to only STR their principal residence and the least restrictive, being an unregulated market. Throughout the process the following five matters were identified as the most relevant to the STR issue:

1. Defining “sharing economy” and “short-term rental”
2. Commercial vs casual operator taxation
3. Alternative tourism accommodation
4. Long-term housing affordability & availability
5. Property rights

The recent public meeting suggested that there was a consensus in the community that STRs should be confined to an owner’s principal residence to curb the commercialization of residential units that would have an impact on housing affordability and availability. Operators/hosts and tourism stakeholders provided a financially motivated perspective in stark contrast against those of affordable housing and tenancy advocates who see STRs as a threat against long-term housing

affordability and availability. There were many participants that experienced consequences from the absence of regulations and the commercialization of the STR industry, especially those residents that spoke to housing/rental loss or price inflation in the housing market. The public open house provided an avenue for residents to provide their personal input and opinion and drew community attention to the STR issue after being placed on hold for over a year due to the COVID-19 pandemic restrictions.

5.3 STR Data Collection & Results: Industry Statistics & Third-Party Scanning Tools

Archival measures in the form of data ‘scrapping’ software service (i.e. Granicus/Host Compliance and AirDNA) was used to analyze the effects of the STR industry on the local housing market and confirm correlation to the tourism industry. These software scanning tools identify geolocations of STR listings linked to property identification numbers (Host Compliance, 2019). “Data scraping” is an unobtrusive method in which a computer program extracts data from human-readable output from another program, in terms of the research question the program would be collecting online STR listings from online STR platforms such as Airbnb (Host Compliance, 2019). These digital screening tools can produce valuable information such as the location, concentration and spread of STRs by municipal ward/district. This type of data provides STR characteristics such as the market distribution of home sharing vs. commercialization. This type of quantitative analysis provides useful empirical data that can strengthen the municipal position if it is decided to pursue regulating and licensing STRs. This data can identify FREH listings and prioritize non-compliant commercial STR operations that may operate without a license and negatively impact the long-term housing supply. This verifiable data can be useful when measuring the true socioeconomic impacts of STRs on local housing and property supply (Wachsmuth, Short-term Cities: Airbnb's impact on Canadian housing markets, 2017). Other archival data such as provincial historical property assessment values, historical vacancy rates and provincially licensed tourist accommodations. Engaging in a more quantitative content-analytic procedures with archival data provides tangible data sets that can be brought into evidence-based decision making for council. It also deepens an understanding into the nature of STRs in the local municipality such as: who operates STRs, how they operate (i.e., home sharing vs commercial), what revenue they bring to hosts and where they are concentrated.

6.0 Jurisdictional Scan: Canadian Case Studies

A jurisdictional scan was completed of three Canadian cities; Ottawa, Toronto, and Vancouver. All three municipalities used a variety of regulations to manage the impacts of their respective STR industries. A summary of the jurisdictional scan, see the appendices, highlights several approaches that were commonly adopted by the municipalities (**Figure 6**).

Zoning & Land Use: The majority of cities limit the location and intensity of STRs by only permitting them in certain neighbourhoods and subject to specific requirements (i.e. parking, owner occupied, max # rental nights and rooms) in order to mitigate land use conflicts.

Principle Residence Requirement: Many cities only permit a host to use their principle dwelling unit, either the entire space or portion thereof (i.e. rooms, secondary or garden suites) for an STR. This limits neighbourhood nuisances and negative impacts from STR commercialization that degrades the local long-term housing market.

Licensing & Tourist Tax: Jurisdictions that were reviewed had a standard requirement for an STR to either register or obtain a business licence to track and monitor hosts. Licensing was crucial to ensure compliance with other regulations (i.e. building/fire codes) and municipal/provincial requirements (i.e. zoning, tourism licensing). Annual licensing fees and a tourism tax were implemented for cost recovery purposes to administer and enforce the program.

7.0 Regulatory and Licensing Framework Option(s)

Based on the results of the data collection and best practices from a jurisdictional scan of other municipalities across Canada, staff would highlight some options for consideration:

1. **Establish a registry and require all STRs to register with the Municipality:** Like other jurisdictions a registration system is pivotal to not only confirm the number and type of STR listings but is the first step in establishing an effective regulatory framework. This registration system should be linked with the Provincial STR registry in order to ensure that both provincial and municipal regulations are being adhered to and can be a first step in a regulatory partnership and enforcement.
2. **Restrict residential STR activity to primary residences and exclude apartments:** It is clear that limiting STRs to principle residences will help reduce the negative consequences on

long-term housing, both ownership and rental, and mitigate land use conflict issues. The principle residence requirement is consistent with the existing home based business requirement contained in the Zoning & Development By-law and it will limit the number of nights the dwelling can be used as an STR since the owner resides in their dwelling most of the year. Based on public feedback, potential land use conflicts and the fact that apartment dwellings provide the majority of long-term rentals, apartments should be excluded, at least initially, from being used as an STR. Apartments could possibly be permitted after a post-regulatory assessment. In regards to secondary or garden suites, these forms of dwelling units could be utilized for an STR under the condition that it is located in the host's principle residence. This would encourage home-sharing and mitigate possible nuisances as the host would be present at the time of stay. Amendments to both the Official Plan recognizing STRs and the Zoning & Development By-law to establish specific STR regulations will need to be completed.

3. **Implement a Short-term Rental Licensing By-law:** To govern the activities of short-term rental platforms, agents and hosts, the city should implement a licensing requirement for STRs in its jurisdiction. Similar to the registry this licensing requirement should be integrated into the Provincial licensing system in order to create a seamless two-tiered licensing process for operators and hosts. The STR licensing program can also be used to address and mitigate additional concerns by incorporating the following:
 - a. Annual licensing fees for STR platforms, hosts and/or property managers with a grace period in the first year of implementation to provide a reasonable amount of time for operators to be educated on the adopted regulations and licensing requirements;
 - b. Requirement for hosts to obtain a building permit and be approved for occupancy to ensure the rental is safe for guests/occupants and the accommodation adheres to all applicable building and fire codes regulations;
 - c. Establish cost recovery by applying a STR licensing fee for additional revenue to offset any costs associated with the operation of the licensing program (i.e. third party data scrapping software, inspections, enforcement); and

- d. Provide specific exemptions from the proposed licensing requirements to allow for a hotel, motel, cottage and bed and breakfast to use the STR marketing platforms without obtaining a municipal STR license.
4. **Establish a Corporate By-law Enforcement framework and increase By-law Enforcement staff:** To ensure compliance with the adopted STR regulations and licensing requirements a separate enforcement strategy will need to be implemented. This strategy should involve the province since more than half of all STR listings is not compliant with applicable Provincial tourism regulations. Due to the number of potential STR listings and proportion of unlicensed listings the city will need to hire additional by-law enforcement staff.
5. **Provide staff with the resources to hire a third-party STR scanning tool:** A 'data scrapping' software service is required to monitor STR activity and provide tools to staff to assist with enforcement of the regulatory and licensing framework adopted by Council.
6. **Establish a post-regulatory monitoring program:** To monitor the effectiveness of the adopted regulations and licensing requirements and provide a follow up report on the status of the local STR industry to council no later than two years after the adoption of the proposed regulatory and licensing framework.

8.0 Monitoring Program Option: Post-regulation

Regardless of the STR regulatory option or framework that councils elect to adopt, staff recommends that a post-regulatory monitoring program be implemented. Due to the complex, technical and complicated nature of STRs the monitoring program should consist of a mixed method approach would be valuable since it would allow both qualitative and quantitative data to be used for continued analysis of the chosen regulatory framework.

The primary benefit associated with a mixed method approach and triangulation is that it applies multiple research methods that can compensate for each research method's limitations (Vogt, 2020). In this case, staff would propose both a social survey and unobtrusive archival methods described below that obtains public opinion, experience, housing, and tourism indicators. Data obtained through both the social surveys and archival methods described above can be used in

triangulation to gain additional insight into the resident's experience and determine either the real or perceived effectiveness of the framework's implementation. While the archival data would present facts, the qualitative data obtained from the social surveys would present the narrative (experiences, opinions) to complete the picture and inform staff of any necessary changes that need to be made post-regulation.

The continuation of utilizing a 'data scraping' service such as Granicus or AirDNA can supply quantitative data such as address location, income generated, nights occupied which is key to monitoring STR activity and measuring the status of compliance with regulations. Quantitative data obtained from federal agencies (i.e. CMHC, Statistics Canada) can provide important housing indicators such as projected vacancy rates, property values, population growth and tourism data. This is complimented by provincial data sets on STR licensing, property assessment and value which helps contextualize the unique characteristics of the local STR industry in Charlottetown. These additional archival data sets can be useful to monitor the impact of the adopted STR regulatory framework on the long-term local housing and rental markets. These factual data sets would also strengthen and support the decision to make changes to the adopted community plan or zoning by-law regulations and/or amend the licensing framework.

Qualitative data obtained through a follow up survey can be administered to the entire community a year or two after the full implementation of a chosen regulatory framework. This survey data can be valuable to understand the thoughts, emotions, and personal impacts that the adopted regulatory framework has had on the community. Some of the resident's lived STR experiences provided through qualitative data methods such as online or mailed surveys, can add additional depth and context to the local STR issue. Drawing on the local resident's experience to collect quantitative data on potential land use issues experienced by STRs and qualitative data that could extract community opinion and experiences on STR activities. This data can then be used to identify potential issues with the STR regulatory framework. It would also provide the local municipal council with strong political basis and capital to amend the adopted planning policies and licensing framework regulating STR activity, especially if local resident feedback presents legitimate land use concerns.

9.0 Regulatory Scenarios

The City commissioned a report that provided an analysis on the impacts that STRs has had on the local economy and housing market based on five (5) different regulatory scenarios:

Scenario 1: Principal residence only, no apartments.

Scenario 2: Principal residence only, apartments allowed.

Scenario 3: Principal residence only, no apartments, but commercial zones allowed.

Scenario 4: Principal residence, apartments allowed, and commercial zones allowed.

Scenario 5: Principal residence, apartments allowed, commercial and DMUN zones allowed.

Note: Each scenario has a different impact on the local housing market. Scenario 1 would ensure that most dwelling units and all non-principal-residence units are returned to the long-term housing market while scenarios 3 to 5 would result in less dwelling units returned to the long-term housing market. Scenarios 4 and 5 would result in the further commercialization of STRs that negatively impacts the availability and affordability of the long-term housing market.

10.0 Conclusion

Despite the impact induced by COVID-19 on Charlottetown's STR industry and tourism overall, with increasing rates of vaccinations, pent up travel demand, and the relative ease of relisting a property on one of the many STR websites it is expected that tourist demand for these accommodations will return. Furthermore, in response to pandemic restrictions some STR listings have switched marketing tactics to provide residences as quarantine sites for essential workers, people travelling for work or visiting families. Therefore, staff advises that there needs to be a regulatory framework consisting of registration requirements to effectively manage the impacts of STRs. It is important that a partnership with the province is established to effectively address licensing requirements and issues of compliance with regulations. The proposed options are intended to support community participation in the larger sharing economy, ensure regulatory fairness in the tourism industry and mitigate any negative impacts to the local long-term housing market and established residential neighbourhoods.

11.0 References

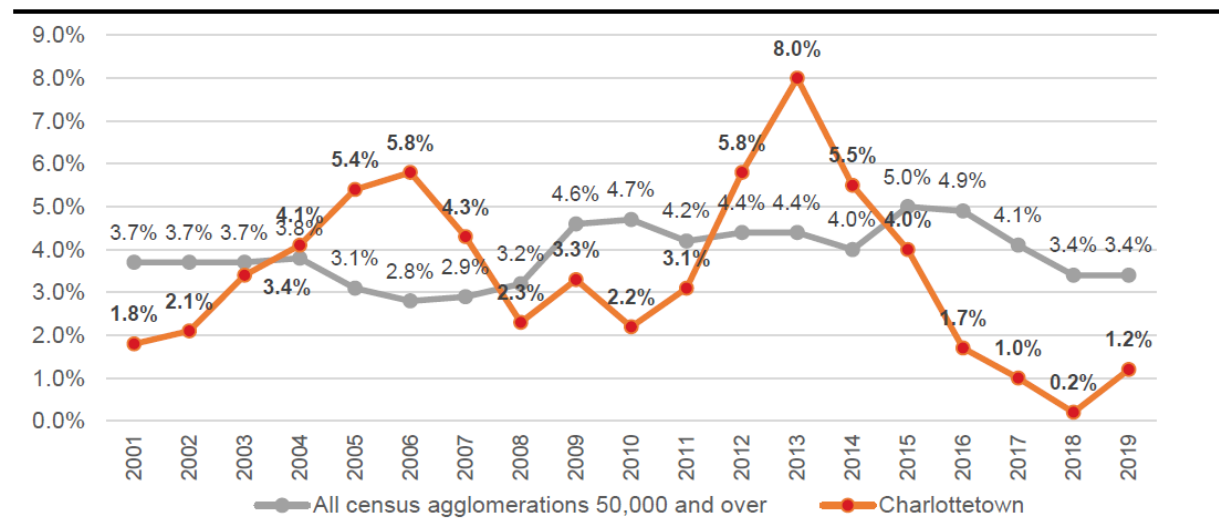
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12.0 Appendices

Vacancy Rates, Charlottetown and Census Agglomerations with 50,000 or more Population, 2001-2019



Private Apartment Vacancy Rates (%)

	Oct-17		Oct-18		Oct-19		Oct-20	
Bachelor	0.0	c	0.0	c	**		**	
1 Bedroom	1.2	a	0.2	b	1.5	c	4.0	d
2 Bedroom	0.8	a	0.2	b	1.1	a	2.4	b
3 Bedroom +	**		0.0	d	**		0.0	d
Total	0.9	a	0.2	a	1.3	a	2.9	b

Figures 1 & 1A. Vacancy Rates, Charlottetown and Census Agglomerations with 50,000 or more Population, 2001-201. Adapted from the Charlottetown Region Growth Study and Housing Needs Assessment, prepared by Stantec Consulting Ltd. Produced by the Canadian Mortgage and Housing Corporation (CMHC), 2019 and 2020.

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Percentage of STR Reservations on a Monthly Basis in Charlottetown and other Canadian Cities, 2019

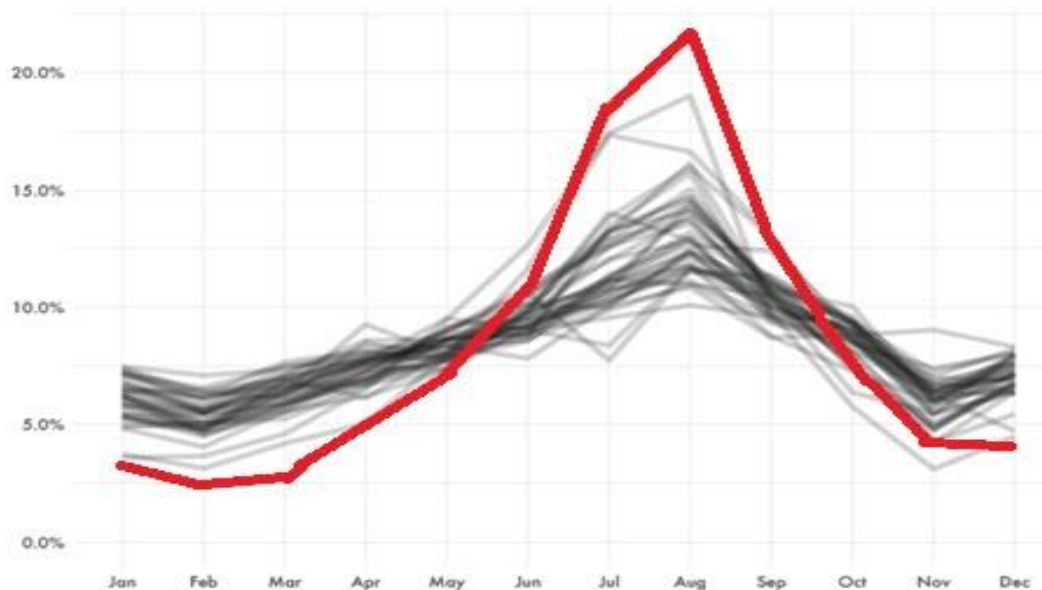


Figure 2. Percentage of growth adjusted STR reservations occurring each month in Charlottetown (highlighted) and other Canadian cities. The high seasonal variation confirms the strong correlation of STR activity and the tourism industry. Data obtained through Host Compliance. Produced by Host Compliance for the City of Charlottetown, 2019.

STR Host Revenue Distribution in the City of Charlottetown, 2019

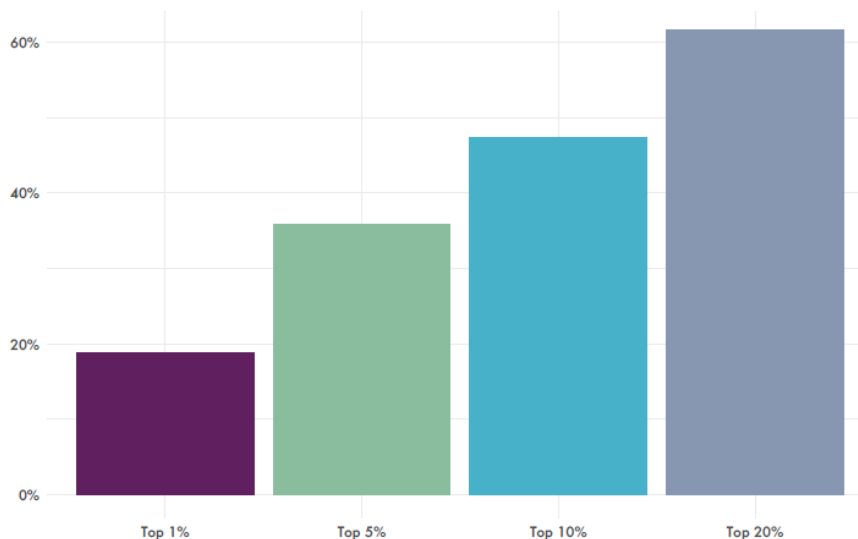


Figure 3. This graph shows the percentage and distribution of the total \$8.5 million in STR revenue for 2019. More than one third (35.9%) of all revenue last year was earned by just twenty hosts, the most successful ten percent of hosts earned nearly half (47.3%) of all STR listing revenue, while the top earning host earned \$440,000. These revenue distributions are concerning as they display a stark transition of the STR industry moving away from home sharing towards increasing commercialization (one host multiple properties). Data obtained through Granicus/Host Compliance and verified by AirDNA. Produced by Urban Politics and Governance research group, School of Urban Planning, McGill University (UPGO), 2019.

Concentration of STR Activity by Municipal Ward, City of Charlottetown

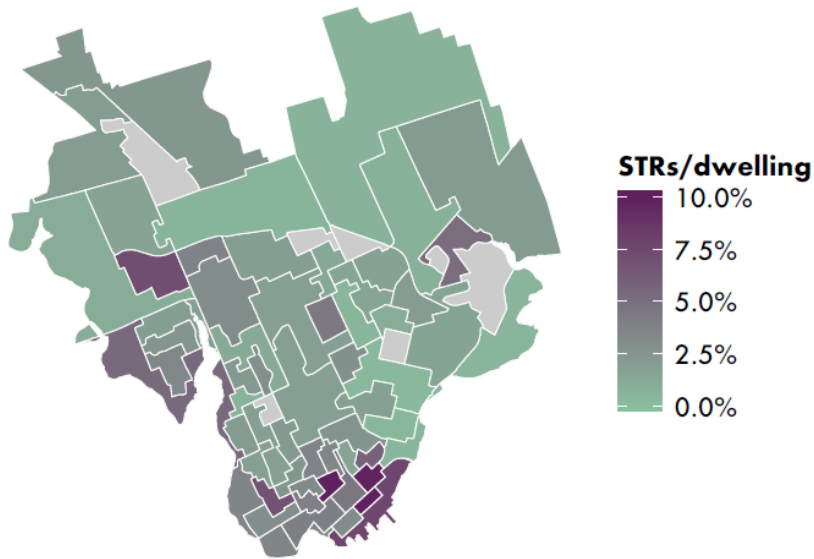


Figure 4. Active STRs as a share of all dwelling units in Charlottetown, by ward and dissemination area. Data obtained through Granicus/Host Compliance and verified by AirDNA. Produced by Urban Politics and Governance research group, School of Urban Planning, McGill University (UPGO), 2019.

Location of Charlottetown STRs by Principal Residence Status



Figure 5. Data collected on STR listings would suggest that the most active STR listings in Charlottetown are being operated out of the host's principle residence, while commercial STRs are likely being booked more frequent. Over the past couple of years there has been a decline in principle residence listings and an uptake in commercial STRs and higher turnover in these listings indicating that the local STR market is increasingly becoming commercialized. Produced by Urban Politics and Governance research group, 2019.

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Short Term Rental Jurisdictional Review: Ottawa, Toronto, and Vancouver

	Restrict STR through Zoning & Land Use	Limit the # of rooms or guests	Principle Resident Requirement	Principle Resident required to live on property	Require License	Other Information
Ottawa	ZBL currently restricts STRs to any dwelling unit type in all residential zones.	Up to a max of 4 sleeping rooms with only two guests per room	Owners permit to rent out primary dwelling. Owners of a cottage in the rural areas may also use STR as a secondary property.	Yes, except for rural areas in relation to cottages	Hosts must register with the city and provide details on the listing. Required to pay \$100 permit that is valid for two years.	City uses revenues from license/registration, permit fees, and municipal accommodation tax to enforce the regulations.
Toronto	Permitted in all housing types in both residential and mixed use zones.	Up to a max of 3 sleeping rooms. Entire home can be rented if owner is away and up to a max of 180 days	Yes, both owners and tenants may STR their primary dwelling.	Yes the principle resident needs to reside at the property full-time but not at time of stay.	Host must register and pay \$50 fee. STR platforms (Airbnb, VRBO) must pay a one-time license fee of \$5,000 plus \$1 for each night booked through the company.	Permitted in secondary and laneway suites under the condition that the suite is the host's primary residence. Owner or strata for a condo must sign a consent form. A fire and safety plan must be submitted for approval and posted in the STR.
Vancouver	Permitted in residential zones and any dwelling type.	No max room but only 2 persons per sleeping room.	Must be a principle residence.	STRs are permitted in secondary or garden suites if the host is present during the stay	Business license required plus an annual fee of \$99.	Owner or condo strata must consent to a STR unit. Hosts sign statutory declaration of compliance with fire/safety regulations. Must list license # on hosting platform and in the unit. Hosts must keep a record of guests. Not permitted in Rental 100 buildings or homes that pay Empty Homes Tax.

Figure 6. A summary of STR requirements in the cities of Ottawa, Toronto, and Vancouver.