



Mayor Jyoti Gondek
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Calgary, AB T2P 2M5

Office of the Councillors
The City of Calgary
P.O. Box 2100, Station M
Calgary, AB, Canada T2P 2M5

December 4, 2024

Dear Mayor Gondek and Council,

I am writing today regarding the next phase of short-term rental (STR) regulation in the City of Calgary and recommendations that will be presented to Council's Executive Committee on December 5th, 2024.

On behalf of Airbnb, I want to thank you, City staff, University of Calgary researchers, stakeholders, and Calgary residents for their collaborative efforts in evaluating and shaping the city's STR policies. We recognize the challenges of balancing community needs, housing concerns, and economic growth, and we value the thoughtful and consultative approach taken by the City and the University of Calgary.

Airbnb shares the City's commitment to addressing housing affordability and supporting community well-being. We strongly believe that revisions to Calgary's STR policies should align with the findings of the University of Calgary study led by Dr. Gillian Petit and Dr. Lindsay Tedds (the study). Airbnb supports smart, effective regulation and urges Council to focus on evidence-based, practical approaches that benefit all Calgarians. Unfortunately, some proposed amendments are not supported by the study and stray from best practices for managing short-term rentals effectively.

While we support many of the proposed changes, we are concerned that some recommendations may unintentionally impact Calgary's economy and communities without effectively addressing the root causes of housing challenges. We encourage the City to take a more evidence-based approach that reflects the University of Calgary's research and prioritizes solutions that benefit all Calgarians.

Airbnb supports the following elements of the proposed STR reforms from the City:

- **Prohibition of STRs in social housing**

We fully agree with the proposed restriction on STR operations in units designated for affordable housing. This policy is clearly supported by the study's recommendation to protect below market and subsidized housing stock. Airbnb has worked with other cities around the world to restrict listings in affordable housing units and are ready and willing to work with you to remove such listings from our platform.



- **Core elements of the licensing regime**

Refining licensing and associated fees is an equitable way to recover administrative costs and support enforcement measures. Additionally, by requiring hosts to only list on licenced platforms, the City will support responsible hosting and an overall better and safer experience for guests.

- **Collaborative compliance tools**

Airbnb has voluntarily implemented measures such as requiring Calgary hosts to input a business license number before listing on our platform. We welcome this requirement being extended to all platforms in order to support better and more efficient enforcement.

While we support many reforms, some are not supported by evidence, conflict with policy goals, and unfairly restrict Calgarians' property rights during an affordability crisis. We urge the City not to adopt these proposals:

- **Moratorium on Non-Primary Residence Licenses**

The proposal to suspend licenses for non-primary residence STRs until Calgary's rental vacancy rate reaches 2.5% is not supported by evidence. The study shows that STRs make up a tiny percentage of Calgary's housing stock and have minimal impact on housing affordability. This measure would hurt Calgarians who rely on STR income to make ends meet, especially during an affordability crisis, while doing nothing to address the real drivers of housing costs.

Policies like this, which lack an evidence base and target minor contributors, divert attention from real solutions and set a troubling precedent for policy development.

- **Extending STR Regulation to Rentals of Up to 180 Days**

The proposed inclusion of rentals lasting up to 180 days within STR regulations introduces unnecessary regulatory overreach and is well outside the normal definition of a short-term rental. No other jurisdiction in North America includes rentals of up to 180 days. There is no apparent reason as to why Calgary would adopt such an extreme and untested approach.

There is further no evidence to support that MTRs are being systematically used to evade existing regulations. It is clear however that MTRs provide essential housing for workers, Albertans accessing healthcare, and people in transition between homes. This regulation will only confuse landlords and tenants, and risk legal challenges.

Recommendations for Evidenced-Based STR Policy

We urge the City of Calgary to ground its decisions in evidence and adopt the following practical solutions to address concerns while avoiding the punitive consequences of ineffective overregulation:



- **Strengthen enforcement through platform compliance**
We recommend maintaining the focus on mandatory license fields to enhance enforcement. These measures are supported by the study as effective tools for ensuring compliance and addressing community needs in a responsive and flexible way.
- **Avoid punitive and unnecessary regulation**
Policies such as the moratorium on non-primary residence licenses and extending regulation to 180-day agreements should be reconsidered in light of the evidence that these measures will not impact housing affordability but result in clear harm to some Calgarians as well as the tourism economy.
- **Leverage the STR market for community and economic benefits**
As the study highlights, STRs serve diverse needs beyond tourism, including transitional housing for Calgarians between homes, accommodations for Albertans accessing healthcare, and temporary stays for professionals and workers. These functions are integral to Calgary's social and economic fabric.

Airbnb is helping to drive economic growth in the City, particularly in neighbourhoods that are underserved by hotels. For every \$100 a guest is spending on their Airbnb rental, they are spending approximately \$200 in the community. That is money that directly supports restaurants, shops and entertainment venues - and their workers - across the city. We estimate that Airbnb drove more than \$100 million in economic activity in Calgary in the last year alone.

Calgary has the opportunity to adopt a regulatory framework that balances accountability, housing affordability, and economic growth. Airbnb is committed to working with the City to refine the proposed bylaw and create regulations that serve the best interests of Calgarians. We welcome the chance to meet with City staff or Council members to discuss these recommendations further.

Thank you for your work on this important issue.

Sincerely,

Alex Howell
Policy Lead – Airbnb Canada