



Report to Council

To: Mayor & Members of Council
From: Jessie Clark, Director of Corporate Services/Clerk on behalf of the Short Term Rental Working Group
Date: September 7, 2021
Re: Short Term Rental Licensing

Recommendation:

That Council receive the revised report from the Temporary Manager, Building and Planning, on behalf of the Short Term Rental Working Group, addressing Short Term Rental Licensing for their information; and further

That Council direct the Working Group to develop a Public Consultation Process to receive input regarding a Licensing Program, with an implementation date to be determined by Council at a later date; and further

That Council appoint an additional member of Council to serve on the Working Group.

Financial Implications:

The development of a Licensing By-Law will incur Municipal administrative processing and enforcement costs. It is anticipated that these costs can be recovered through the licensing fees. The Municipality typically budgets \$10,000.00 annually for by-law enforcement services. This amount was increased to \$25,000.00 in the 2021 budget in anticipation of a 2021 implementation date for STR licensing. Any further costs cannot be determined at this time and can be provided at the time of presenting the draft rules and regulations of the Licensing By-Law to Council.

Background:

At the December 1, 2020 Council Meeting, the following resolution was approved:

Resolution No. **R2020-662**

Moved by Councillor Armstrong
Seconded by Councillor Franzen

That Council receive the report from the Temporary Manager of Building and Planning, on behalf of the Short Term Rental Working Group, regarding

Short Term Rental Licensing for their information; and further
That Council direct staff to prepare a Short Term Rental (STR) Licensing By-Law and associated application forms for public

consideration; and further

That Council direct staff to review and update the existing relevant by-laws as outlined in this report and a draft Nuisance By-Law for Council's consideration; and further

That Council direct the Short Term Rental Working Group to reconvene two more times to obtain information from stakeholders which the Working Group has already heard from and fine tune the report to bring back to Council.

Carried.

The Working Group met December 14, 2020 to obtain additional information from the stakeholders who wished to make a further submission regarding the recommendations contained in the December 1, 2020 staff report. The Working Group met again on December 18, 2020 with the Municipal Solicitor.

Staff have taken the original report that was presented to Council on December 1, 2020 and added fine tuning/highlighted changes and clarifications.

At the September 1, 2020 Council Meeting, the following resolution was approved:

Resolution No. **R2020-463**

Moved by Mayor Clarkson

Seconded by Councillor Lambshead

Whereas Short Term Rentals are a growing challenge for Municipalities to manage; and

Whereas this is a complex issue with many types of short term rentals, and negative impacts as well as positive benefits;

Therefore, Council directs the creation of a Working Group to investigate the issue in our Municipality; to understand the problems and the extent of them; to receive legal advice on enforceable options; to invite public input, including but not limited to, impacted ratepayers, commercial tourist establishments, and ratepayers who own short term rentals; to research best practices implemented by other like Municipalities; and to explore and recommend potential policies for Trent Lakes; and further
That Council appoint Mayor Clarkson and Councillor Armstrong to serve on the Working Group with staff members as appointed by the CAO; and further

That the Working Group be tasked with presenting a report back to Council by year end.

Carried.

Staff assigned to the Working Group included Donna Teggart, CAO, Jessie Clark, Director of Corporate Services/Clerk, Adele Arbour, Planning Technician and John Eisinga, Chief Building Official.

Process:

Initially the Working Group searched the web to understand how many Short Term Rentals (STRs) were in the Municipality and determined there were approximately 150 properties. To assist in understanding the size of the Short Term Rental (STR) sector, the Working Group scanned the web for the number of advertised STR properties in the Municipality. At that point in time, there were approximately 150 advertised properties. A list was compiled and documentation obtained from those Municipalities that were either looking into STRs, had looked at STRs or had implemented some form of guidelines. In addition, STR Licensing By-Laws from over 30 municipalities were reviewed.

The Working Group developed a work plan, reviewed the various definitions of STRs, listed all the issues with STRs and the jurisdictional authority responsible for management or control. The Working Group also developed a list of STR benefits and lastly developed a toolbox to deal with STRs, all to be found as Appendix "A" to this report.

The Working Group has been meeting once a week over the last several months and invited the following individuals to meet and provide input to the Working Group:

- Chris and Debbie Beggs and Jim Stasiuk, Ratepayers Impacted by STRs
- Steve Brockbank, Director of Emergency Services
- Dave Potter, Transfer Station Attendant
- Tracie Bertrand, Peterborough Kawarthas Economic Development
- Dave Reid, Chair Economic Development Committee
- John Ewart, Municipal Solicitor
- Louis Melizan, Owner of Three Castles Resort
- Leslie Clarkson, Manager of Scotsman Point Resort
- Constable Jason Clarke, OPP
- Dave Lavalley, Kawartha Guard Services
- Lynn Woodcroft, Real Estate Agent
- Jenn Brouwer, Short Term Rental Owner
- Marlys Kerkman, Buckhorn Ratepayers Association
- Christine Brickman, Crystal Lake Community Association
- Gary Jarosz, Cavendish Community Ratepayer Association
- James Henry, Vice President of Blue Mountain Resorts and Member of Blue Mountain's Committee to review STR By-Law
- Mike Rizzo and Tara Daniel, Short Term Rental Owner
- Jon Pople, Township of Ramara By-Law & Licensing Supervisor

The Working Group acknowledges that they have received input from a cross section of individuals and groups impacted by STRs, and that they were generally in support of the development of a STR Licensing By-Law. A summary of these submissions can be found in Appendix "B" to this report.

On November 12, 2020, based on all the research, benchmarking and presentations, the Working Group considered a range of different options and reached agreement on a set of recommendations to be forwarded to Council for consideration.

Reconvening of Working Group December 2020

Following the Council resolution of December 1, 2020, the Working Group provided an opportunity for all the individuals previously interviewed to provide comments on the December 1, 2020 STR report. The Working Group met on December 14, 2020 to obtain further submissions from stakeholders. In addition, many individuals phoned and emailed their comments on the report. (NOTE that a full public consultation is being recommended in early 2021, once there is a draft by-law detailing specifics of the STR program.)

Staff circulated the Short Term Rental report to all stakeholders which were originally interviewed by the Working Group in order to obtain input on the original recommendations, either written or through a presentation at a Working Group meeting. The following stakeholders submitted input on the recommendations which the Working Group considered when drafting the revised report:

- Mike Rizzo, Short Term Rental Owner
- Christine Brickman, Crystal Lake Community Association
- James Henry, Vice President of Blue Mountain Resorts and Member of Blue Mountain's Committee to review STR By-Law through Stephen Smith
- Tracie Bertrand, Peterborough Kawarthas Economic Development
- Debbie Begg, Ratepayer Impacted by STRs
- Chris Begg, Ratepayer Impacted by STRs
- Jim Stasiuk, Ratepayer Impacted by STRs
- Dave Reid, Chair Economic Development Advisory Committee

Subsequently, the Working Group revisited its December 1, 2020 report and made revisions to allow for the following:

- exemptions to the licensing requirement for property owners who are "occasional" renters and rent out their residence for 21 days or fewer per year

The rationale for this consideration:

- the issues associated with STRs have not arisen with the occasional renters and are primarily with STRs that are run more as businesses and have a continuous turnover of renters
- there are significantly more of these occasional renters than originally understood and the Municipality does not have the resources or capacity to license all of these
- a reduction in the requirements for a license approval, to focus on those aspects that have a direct and material impact on the health and safety of renters.

The rationale is that by approving a Short Term Rental license, the Municipality is licensing the property for a Short Term Rental and needs to be satisfied that the property meets the Municipal regulations.

- further clarification of some aspects of the December 1, 2020 report content

All of the above have been incorporated into this updated report.

Short Term Rental Overview

Homeowners have always managed to rent out or share rooms in their residences. Traditionally, these transactions were local and limited in nature. With access to the internet and web platforms such as Airbnb.com and VRBO.com, now anyone can advertise and rent out their homes to complete strangers from distant locations with a few mouse clicks or taps on a smartphone screen. As a result, STRs are increasing rapidly. According to a study by McGill University, STRs in rural areas are growing twice as fast as in large cities. And there is a trend toward STR properties being owned and managed by companies, rather than individual homeowners.

Most Municipalities are dealing with the emerging challenges presented by STRs. Problems associated with their operation are not unique to Trent Lakes. It is estimated that there are about 150 routinely rented STR properties operating in the Municipality. This represents about 2.5% of all residential dwellings. While there were only 9 formally reported complaints recorded specific to STRs, many other by-law complaints did not indicate whether the property was a short term rental or not. Councillors have been receiving calls for the past two years pushing for some type of control over STRs in Trent Lakes. Next to waste passes, new public work depots and quarries, short term rentals were the most voiced concern in the 2018 election campaign. Some cottagers have reported receiving calls from companies wanting to purchase their property for the sole purpose of establishing a STR. It is expected that the numbers of STRs will continue to grow in Trent Lakes and the concerns over STRs are anticipated to increase.

Some of the common complaints about STRs include the following:

- Excessive noise
- Septic System under capacity for large groups
- Owner not available to address complaints
- Overflow parking onto fire routes, road allowances or other properties
- Fire hazards – bonfires, fireworks, etc.
- Lack of adherence to property standards
- On-site waste management
- Renters with no understanding of local rules, norms and processes
- Transformation of peaceful residential communities into communities of transients
- The intensity of a commercial-like use in a residential setting
- Impacts of STR rentals on established tourist accommodation businesses (e.g. Resorts)
- Lack of (tax) revenue to the municipality
- Impact on neighboring property values – both higher and lower

Conversely, there are some acknowledged benefits of STRs:

- Boosts tourism
- May bring incremental revenues for local businesses
- Allows some new home buyers to purchase, as they offset costs with rental income
- Increases the supply of vacation properties, and in different parts of the Municipality
- Offers a different kind of experience, compared to available commercial options

Considerations by the Working Group

As a general principle, it was agreed that STRs should not adversely affect the residential character of neighbourhoods in Trent Lakes, nor should they be used in ways that unreasonably interfere with any person's enjoyment of their residence.

At the same time, it was agreed that there are no legal reason STRs can not be operated out of a dwelling. The Working Group also agreed that any solution should focus on the public necessity and desirability to regulate the short term rental of residential premises for reasons of health and

safety; ensuring required essentials are provided, reducing the impact of rental properties to the surrounding neighbourhood while protecting residential amenity, character and stability of residential areas.

Objectives for the Working Group's Revised Proposal included:

- Give property owners the option to utilize their properties as short term rentals to help them make ends meet
- Minimize public safety risks and the noise, trash and parking problems often associated with short term rentals without creating additional work for the local enforcement officials
- Develop a solution that is self-funding and does not increase the tax rate
- Provide a value add for STR owners and renters by requiring safety and health measures to be in place at those licensed properties
- Allow for managed growth of STRs to augment the supply of visitor accommodations in Trent Lakes

The Working Group reviewed several possible approaches for acknowledging and addressing the growth of STRs in the Municipality.

A zoning solution was considered, but recent court decisions have disallowed restriction of STRs in residentially zoned areas.

A purely educational solution was considered, but not supported by the Working Group because it provided no ability for the Municipality to manage STRs and communicate directly with owners to ensure compliance with safety and health regulations.

Strengthening existing by-laws and fines and augmenting enforcement was considered. This alone did not provide the unique benefits of a Licensing system. The Working Group reached the conclusion that a Licensing approach was the most suitable for managing STRs in Trent Lakes.

The key reasons for this are:

- A license allows for the Municipality to *inspect* the STR property and *ensure compliance* with health and safety regulations
- A license holds the *owner* accountable; whereas bylaws are enforced against the transient perpetrator i.e. the renter
- Under a license system, Municipal Administrative Penalties levied against the *owner* may be added to that person's *tax bill*, and any challenges to penalties are heard by an Appeals Committee, *not* the court system.
- Several similar Municipalities have adopted or are considering the License approach, including Highlands East, Ramara, Blue Mountain, Prince Edward County, Niagara-on-the-Lake, and Fort Erie.

Further rationale supporting the recommendations are detailed in the Conclusions section.

Recommendations:

The Working Group, subsequent to their thorough review, are recommending to Council that STRs that operate more like a business and routinely rent out their properties be governed through a STR Licensing By-Law, to include an Administrative Penalty System, an Appeals Committee and a Demerit Points System.

The most difficult challenge for the Working Group was defining a way to differentiate “casual” renters, who do so for a few weeks a summer to offset costs rather than generate revenue, from the “routine” renters who do so for most of the season and bring a continuous turnover of outsiders into the community. There is no precedent for this exemption in other Municipalities, so the Working Group is presenting a proposed definition that appears reasonable and applicable to the issues of concern in the Municipality of Trent Lakes.

We are proposing that any owner who rents for a total of 21 days or less during the year, be exempt from licensing.

The Working Group understand that the 21 day number is a best guess threshold and could be higher or lower. Based on the input of those people who have communicated to us, up to 21 days of rentals seems to be the norm for those who do “casual” renting to offset their costs. During the proposed public consultation period, further comments on this will be invited.

In addition to licensing STRs, it became apparent that existing Municipal By-laws need to be reviewed and updated if necessary, and there needs to be an ability to enforce through a Municipal Administrative Penalty System. These By-laws include:

- Property Standards By-Law (B2014-095, B2017-099)
- Parking By-Law (B2016-048)
- Snow Clearing By-Law (B2018-015)
- Fireworks By-Law
- Burning By-Law (B2016-051)
- Noise By-Law (B2016-062)
- Licensing of Dogs and Kennels (B2018-079)

The Working Group also recommends that a Nuisance By-Law be developed for consideration by Council which may include infractions for frivolous complaints.

The list of recommendations discussed can be found as Appendix “C”.

In summary, the Working Group recommendations are included below. More details will be provided in the document made available for the public consultation process, should Council approve the recommendations in this report.

A proposed definition of a STR is ‘a building or structure or any part thereof that operates or offers a place of temporary residence, lodging or occupancy by way of concession, permit, lease, licence, rental agreement or similar commercial arrangement for any periods of less than twenty-eight (28) consecutive calendar days, throughout all or any part of a calendar year. Short-term rental accommodation uses shall not mean or include a motel, hotel, bed and breakfast establishment, hospital, trailer parks, commercial resort unit or similar commercial or institutional use.’ To clarify, if an owner rents out their residence more than 28 consecutive days to one group of guests, this is not a short term rental.

A Licensing By-Law is proposed for STRs that:

- a) Requires a license where there is an exchange of money and the property is rented out for more than a total of 21 days during the year;
- b) imposes health and safety requirements (compliance with selected sections of the Building Code i.e. proper railings and stairs, selected sections of the Fire Code i.e. smoke alarms and emergency exits), including restrictions and by-law compliance and involves a property visit;
- c) uses Municipal Administrative Penalties for violations of restrictions and By-Law infractions, with escalating fine amounts applied to the owner and failure to pay added to the tax roll;
- d) includes a Demerit Point System, including a threshold for revoking STR license;
- e) creates an Appeals Committee;
- f) promotes public education and marketing.

Application requirements:

- a) owner information and contact information;
- b) name and contact information of a responsible person who is located within 1 hour of STR property and available to respond to inquiries and complaints on a 24-hour basis, with complaints being rectified within 24 hours;

- c) compliance with applicable sections of the Fire Code, Building Code and Building Code Act, Health and Safety Codes that directly relate to the health and safety of guests;
- d) Site Plan and Floor Plan, drawn to scale with dimensions (type and occupancy of each room, location of smoke detection/early warning devices, fire extinguishers, parking locations, buildings, structures and septic system/well, as applicable) copy of, Code of Conduct and/or rental package;
- e) proof of liability insurance (\$2 million per property and bodily harm);
- f) confirmation of no outstanding taxes;
- g) confirmation of cleaning protocols as may be prescribed by Peterborough Public Health;
- h) confirmation of current year burn permit;
- i) confirmation by PPH that the septic is in good working order and appropriate for the number of occupants;
- j) confirmation that the dwelling unit has safe drinking water;
- k) requirement that the owner notify the Municipality if there is a sale/change of ownership and the new owner must apply for a new license
- l) acknowledgement that the STR license number is included in all advertising for the STR; and
- m) acknowledgement of the STR submitting a renewal application annually to maintain the license and remain in good standing.

Restrictions:

- a) 2 guests per bedroom, with a maximum number of guests of 8, with a possible exclusion of children;
- b) minimum length of stay is 2 nights;
- c) only one group of guests per rental;
- d) STRs not permitted in accessory structure i.e. garage, shed, recreational vehicle;
- e) Guest Cabins are permitted to be included as a licensed bedroom;
- f) one parking space per licensed bedroom; and
- g) no STRs in Trailer Parks.

Fees and Fines:

- a) license fee (fee amount under comprehensive review);
- b) develop schedule of fines and escalating fines for repeat offenders to apply to property owner

Demerit Point Schedule:

- a) assign 1 point to each infraction;
- b) after 3 demerit points, a license will be revoked;
- c) if a license is revoked, the wait time to reapply is 2 years from the date the license is revoked

Enforcement of STR By-Law:

- a) 311;

- b) By-Law Enforcement;
- c) OPP;
- d) Appeals Committee
- e) Consideration of outside administrative support (i.e. Granicus)
- f) if the Municipality must rectify the violation it will be at the expense of the owner with such being added to the tax roll;

Appeals Committee:

- a) Composition – 5 members with 3 public and 2 Councillors
- b) Public members preferred to have mediation or enforcement experience;

Consideration of Supporting Documents to be Developed:

- a) STR By-Law – with all related forms
- b) Nuisance By-Law
- c) Revise relevant Municipal By-laws
- d) Sample STR Code of Conduct
- e) Trent Lakes website listing of licensed STRs

Public Consultation/Engagement:

- a) Questionnaire/Survey
- b) Public Notices in newspaper
- c) Signage at Waste Transfer Stations
- d) Notice in Tax Bill and Newsletter
- e) Public Meeting

In order for the public to provide input to a STR Licensing program, the Working Group recommends that a program document be made available for public review and comment. Staff anticipate as a result of the public consultation process there may be a need for some minor refinements to the draft STR Licensing By-Law and application forms.

Pending the outcome of the public consultation process, a draft Licensing By-Law will be created based on the proposed requirements presented above, and using input from other similar municipal STR licensing By-laws, including Highlands East (draft), the Township of Ramara and the 30 Municipalities reviewed by the Working Group.

Conclusion:

The proposed licensing program will regulate the business of operating a short term rental accommodation. Owners are held responsible for the operation of their business. The draft STR Licensing By-Law would apply to all properties within the Municipality of Trent Lakes that are rented for time periods of less than twenty-eight (28) days, and would exempt those that rent for a total of 21 days or fewer days in the course of a year. Licensing would apply to all STRs regardless of the date created – grandfathering would not be applicable. Licensing will apply

equally to existing STRs and proposed STRs and will require inspections to ensure safety is maintained. It is intended that this program will sustain itself financially. The proposed fees assume a model funded by short term rental providers and not reliant on the general property tax base. The licensing fee and fines are intended to be substantial enough to deter non-compliant behaviour, but are affordable by short term rental providers who routinely rent out their properties and earn income. This funding model will be reviewed yearly at Budget time.

A licensing program would introduce a management and control mechanism for the Municipality to specifically address the business of short term rental accommodations. Gaining regular access to a property to ensure its safety is easier to obtain through the requirement of an inspection in order to acquire, renew or keep a license, than gaining entry in order to determine compliance under requirements such as those in the Building Code, Fire Code, the Municipality's Zoning By-Law and Property Standards By-Law.

The purpose of STR Licensing reinforces the Municipality's authority to pass by-laws respecting the health, safety and well-being of persons and the protection of persons and property. Proposed regulations would require owners of STRs to meet specific conditions for providing and maintaining safe residential accommodations as a requirement of obtaining, continuing to hold, or renewing a license.

The Working Group recommends a STR Licensing Program for the following reasons:

- The Municipal Act provides authority to a municipality to govern its affairs as it considers appropriate and to enhance a municipality's ability to respond to municipal issues.
- The Municipality considers it necessary and desirable to regulate those residential rental premises that are routinely rented out to ensure that community neighbourhoods are not turned into tourist areas to the detriment of residents and their enjoyment of their property.
- A licensing program proactively provides protection for the health and safety of persons renting STR properties by ensuring certain regulations are met.
- A licensing program would assist in addressing STR issues and overcomes the limitation of existing tools – minimizing the potential for “party houses”, irresponsible renters and helps to ensure they do not create a nuisance to the surrounding properties and the neighbourhood and; to protect the residential amenity, character and stability of the areas in which STRs are located.
- A licensing program would complement zoning regulations and enhance by-law enforcement efforts to address concerns expressed regarding the business of STRs.
- A licensing program would assist in addressing STR issues and overcomes the limitations of existing tools. It is intended to be funded by STR operators and not the taxpayer.
- The owners would be held accountable and responsible for the operation of their business.

- A licensing program promotes fairness in the STR market, requiring licensees to maintain the same rental standard.
- A licensing program encourages levelling the playing field as STRs are measured, based upon the same standards/requirements – licensees are accountable and responsible for the operation of their rentals.
- A licensing program provides a healthy, quality and safe STR accommodation with substandard rental properties and non-compliant operators proactively identified.
- The community benefits through the promotion of quality and safe STR accommodations and compatibility with the surrounding neighbourhood community.

The Working Group considers it desirable to protect the character, values and personal enjoyment of neighbourhoods, while ensuring that licensed STRs provide a safe and healthy space for renters to enjoy.

A public consultation process will be developed to get input from the public on the proposed requirements, restrictions, fees and fines, demerit point schedule, enforcement, and appeals committee as described in the original report. The proposed public consultation will involve a survey, newspaper notices, signage at the Transfer Stations, Notice in the Tax Bill and Newsletter, and a public meeting. After public input has been received and reviewed, a final recommendation will be made to Council, and should Council still support a licensing approach, a draft by-law will be prepared. The Working Group would encourage the public consultation process to be scheduled in a way that would allow for a final draft by-law to be presented to Council and implemented in spring/summer 2022, pending the results of the public consultation.

Submitted by:

Approved by:

Jessie Clark, Director of Corporate Services/Clerk

Donna Teggart, CAO/Treasurer

2020 Work Plan – Short Term Rental Working Group

Actions	* Lead **Support	Timing	Status
Investigate size of STR problem in Trent Lakes by researching STR Websites for properties available for rent over 3 weeks	* Carol **Derek	Sept 11 – Sept 24	Carol completed and presented findings to group Sept 17. Roughly 128+ properties and Carol provided specifics on cost to book through various organizations and insurance coverage by each
Research Definitions involving STR to create the necessary foundation for future discussions	*Adele **Donna	Sept 11 – Sept 16	Adele completed and presented to group Sept 17
Create a list of problems via a flip chart and decide whose jurisdiction they fall under (e.g. parking, noise, zoning, enforcement, financial implications)	*Working Group	Sept 17	Group went over list produced by Adele
Group to create a list of stakeholders to be interviewed (e.g. Associations, Resort Owners, Renters, Emergency Services)	*Working Group	Sept 17	Group went over list of stakeholders. Donna directed to contact Insurer and Peterborough Public Health to see if they can offer input for future interviews
Interview stakeholder groups	*Working Group	Sept 25	Dave Potter & Steve Brockbank – 9:30-10:00 Dave Reid & Tracie Bertrand – 10:15 – 10:45
John Ewart to attend to discuss options available and legal ramifications of each. Discuss as a group tools available in toolbox and next steps for future meetings	*Working Group	Oct 1	Planned Work for October 1
Interview stakeholder groups	*Working Group	Oct 8	Resort Owners – 9:30 – 10:00 Jason Clarke OPP & Kawartha Guard – 10:15 – 10:45
Interview stakeholder groups	*Working Group	Oct 15	Mike Rizzo & Jenn Brouwer – 9:30 – 10:00 Marlys Kirkman – 10:15 – 10:45

Interview stakeholder groups	*Working Group	Oct 22	Gary Jarosz & Christine Brickman – 9:30 – 10:00
Perform an environmental scan of how other Municipalities in Ontario have addressed the issue of Short-Term Rentals and how successful they have been and implementation/ongoing costs of each. Discuss best way to do Public Consultation.	*Working Group	Oct 29	Carol, Derek and Adele have already compiled some information on this.

SHORT TERM RENTAL DEFINITIONS

BLUE MOUNTAIN (By-Law NO. 2009-04)

"SHORT TERM ACCOMMODATION (STA)" means a dwelling or structure or any part thereof that operates or offers a place of temporary residence, lodging or occupancy by way of concession, permit, lease, license, rental agreement or similar commercial arrangement for any period less than thirty (30) consecutive calendar days, throughout all or any part of a calendar year. Short term accommodation shall not mean or include a motel, hotel, bed and breakfast establishment, tourist cabin or cottage, hospital, commercial resort unit or similar commercial or institutional use.

NIAGARA-ON-THE-LAKE (By-Law NO. 4634-13)

SHORT TERM RENTALS means the use of a building for overnight guest lodging for a period of not more than 28 days and includes Bed and Breakfast Establishment, Cottage Rentals, Villas, County Inns and Vacation Apartments.

TORONTO

A short-term rental is all or part of a dwelling unit in the City of Toronto used to provide sleeping accommodations for any rental period that is less than 28 consecutive days in exchange for payment. This includes existing bed and breakfasts and excludes hotels and motels and accommodations where there is no payment.

VANCOUVER

"A short-term rental (STR) is a home, or a room in a home, that is rented for less than 30 days at a time."

NEW ORLEANS

"Short term residential rental" means a dwelling unit located within the city that is rented as, or held out as being used as, a shared housing unit, bed-and-breakfast establishment or vacation rental."

CHICAGO

"Shared housing unit" means a dwelling unit containing 6 or fewer sleeping rooms that is rented, or any portion therein is rented, for transient occupancy by guests. The term "shared housing unit" shall not include: (1) single-room occupancy buildings; (2) hotels;

(3) corporate housing; (4) bed-and-breakfast establishments, (5) guest suites; or (6) vacation rentals.

PRINCE EDWARD COUNTY

Short-term accommodation rentals can be defined as all, or part, of a dwelling unit used to provide sleeping accommodation for vacationing members of the public, but may also include persons travelling for business or work purposes. Most commonly these types of accommodation are marketed through web-based services, such as Airbnb, CanadaStays, or VRBO-style organizations.

VILLAGE OF RADIUM HOT SPRINGS, BC

Short term rental means the commercial accommodation of guests in a private residence, which could include a room, apartment, secondary suite, or house, on a temporary basis, this being 30 consecutive days or less.

TOWN OF OAKVILLE

Short-term Accommodation means the provision of a dwelling unit which is used for the temporary lodging of the travelling public for a rental period not greater than 28 consecutive days.

TOWNSHIP OF SEVERN

Short Term Accommodation refers to the rental of a dwelling or dwelling unit to travellers for a period not exceeding 30 consecutive days. STAs do not include traditional commercial; accommodation such as hotels, motels, tourist establishments, and bed and breakfast establishments. Short term rental must be secondary to the use of the property as a residence and must be the principle residence of the owner/operator. Limited to three bedrooms for guests. Must have adequate parking and no traffic hazards.

KAWARTHA LAKES

Short Term Rentals are when you stay in a rental space for 30 days or less. This could include renting a private room in a home, an entire home, a seasonal property like a

cottage or other space. Short Term Rentals do not include established accommodations such as bed and breakfasts, hotels, trailer parks or campgrounds.

FERNIE, BC

A Short-Term Rental (STR) refers to the rental of all, or a portion of, your home, for a period of less than 30 days. In the City of Fernie, you must have a license to operate a STR in your home.

VAUGHAN

Short-Term Rentals (STRs) are considered a home or a portion of a home used to provide temporary accommodation for not more than 29 consecutive days.

FORT ERIE (By-Law No. 113-2019)

Short-Term Rental means all or part of a dwelling unit, subject to licencing by the Town, to provide sleeping accommodation for any period of thirty (30) calendar days at a time or less in exchange for payment, but does not include any type of institutional dwelling, hotels, or other similar uses.

HUNTSVILLE (By-Law No. 2019-122)

Short-term Rental Accommodation means the use of a single family dwelling, as defined in Comprehensive Zoning By-Law 2008-66P, as amended, or a single detached dwelling which is owner occupied and in which not more than two bedrooms are rented, and that operates or offers a place of temporary residence, lodging or occupancy by way of a concession, permit, lease, license, rental agreement or similar commercial arrangement for any period equal to or less than thirty (30) consecutive calendar days, throughout all or any part of the calendar year, unless otherwise prohibited by this by-law, or any other by-law of the Town of Huntsville. Short-term Rental Accommodation uses shall not include any other form of residential dwelling, a hotel, motel, motor hotel, nursing home, private or public hospital, a recreational vehicle park, a tent campground, or similar commercial or institutional use, as defined in Comprehensive Zoning By-Law 2008-66P, as amended.

MINDEN HILLS

Short Term Rental or Short Term Accommodation typically describes residential dwellings which are rented over a short period of time (e.g. less than 30 days) for monetary gain. The use of the dwelling for a STR can take many forms ranging from a resident of the property who, from time to time, rent out the dwelling while on holiday themselves, to owners of property who continually rent the property out as an investment income.

PRINCE EDWARD COUNTY

Short Term Accommodation Rentals can be defined as all or part of a dwelling unit used to provide sleeping accommodation for any rental period that is a short duration of approximately 30 consecutive days or less. Persons staying at a Short Term Accommodation Rental are usually a vacationing member of the public, but may also include persons travelling for business or work purposes.

TOWNSHIP OF RAMARA (By-Law No. 2020.11)

Short-term rental accommodation means a building or structure or any part thereof that operates or offers a place of temporary residence, lodging or occupancy by way of concession, permit, lease, licence, rental agreement or similar commercial arrangement for any period less than twenty-eight (28) consecutive calendar days, throughout all or any part of a calendar year. Short-term rental accommodation uses shall not mean or include a motel, hotel, bed and breakfast establishment, hospital, commercial resort unit, village commercial resort unit or similar commercial or institutional use.

ISSUES WITH STR

JURISDICTION

Septic System (being used in accordance with designed capacity)

Peterborough Public Health

Safe potable water (water quality related to supply source and proper operating septic system) - testing

Peterborough Public Health

Parking (overflow parking on Fire Routes, Municipal and County Road Allowances)

Municipality, County, Road Associations

Excessive Noise

Municipality and OPP

Zoning

Municipality

Enforcement

Municipality and OPP

Financial Implications

Municipality

Ability to Contact Property Owner

Municipality

Fire Hazards and Fire Safety Standards/Emergency Services

Municipal Fire Department and EMS

Property Management/Maintenance Concerns

Municipality

Neighbourhood Concerns

Municipality

Road Association Concerns

Road Associations/Private

Public Safety Concerns

Municipality, Peterborough Public Health, OPP, Humane Society

Competition with Hospitality and Accommodation Industry (Resorts)

Federal Government Competition Bureau

Business with no Appropriate Taxation

Municipality, MPAC, CRA

Absentee Operators

Municipality

No limit to the number of persons renting or number of days/weeks rented

Municipality

Littering/Garbage/Recycling	Municipality
Animals/Dogs	Municipality/Humane Society
Fences	Municipality
Municipal Liabilities	Municipality and Legal Counsel
Potential Reduction in general supply of rental housing and Ownership	Municipality
Land Use Conflicts	Municipality
Declining Property Values(ability to sell)	
Lack of Enforcement	Municipality, OPPI
Should have Commercial Liability Insurance	Insurance Companies
Speculation and Purchase of Properties for STRs has driven up property prices	
Impact to businesses and industry's ability to attract skilled and specialized work force to the area	
No regulations enforced regarding Covid Protection	Peterborough Public Health

BENEFITS

Boost Tourism

Economic Development Spin-offs – restaurants, attractions and local businesses

Economic Benefits to Property Owners that Choose to Participate

More Affordable than Hotels as Many Individuals can Split the Cost

More Unique experience

Expand Access to Buyers

TOOL BOX FOR SHORT TERM RENTALS

1. Do Nothing
2. Licensing
3. Registry System
4. Review and Beef Up Municipal By-Laws i.e. Noise By-Law, Property Standards By-Law, etc. with increased fines
5. Implement a Transient Accommodation Tax (Hotel Tax) – on hold for 2021
6. New By-Law for STRs – restrict days or weeks to be rented, restrict guests to Primary Residents
7. Zoning By-Law Amendment to Restrict STRs along shoreline properties
8. Impose and increase fines to property owners for violations that have occurred by Renters
9. Education Approach – package of information for renters regarding garbage Disposal and recycling, noise by-law, etc.
10. Enforcement

Short Term Rental Working Group Background – Consultations

Chris and Debbie Beggs, Jim Stasiuk – Ratepayers impacted by Short Term Rentals

Debbie and Chris Beggs, as well as Jim Stasiuk, told similar stories of living next door to STR properties. The stories consisted of STR properties being rented to large groups of people ranging from 15-20+ people, noise, parking issues, garbage – all of which are resulting in a loss of enjoyment of their property. The main issue expressed was noise and the fact that renters are taking away the enjoyable use of their property. Renters are paying up to \$10,000/week and feel that this gives them the right to make as much noise as they want. There was also concern expressed about renters entering their property and their safety. They have called the OPP in the past but noise was not as bad when the OPP finally arrived although they did take statements.

Steve Brockbank, Director of Emergency Services

Steve explained to the Working Group that the Fire Department doesn't typically know whether the calls they are responding to are renters or owners. Depending on the nature of the call, that type of information may be disclosed. Even if that information is collected through their department, it may not be able to be released to the Building/By-law Department. The Fire Code has regulations for more than ten (10) people sleeping in a structure.

Dave Potter, Transfer Station Attendant

Dave Potter outlined concerns relating to waste management. In particular, he emphasized the discrepancies with black/clear bags and where recyclables go in Trent Lakes compared to their home municipalities and encourages the Municipality to urge the Province for consistency in the recycling streams. He also described unspent fireworks, ashes and sharps being a safety concern. Through the purchase of the cottage kits, the Transfer Station Attendants are able to provide education to renters/landlords.

Tracie Bertrand, PKED

Tracie outlined the general position of traditional accommodators and visitors and owners with respect to short-term rentals. The traditional accommodators don't feel a sense of fairness whereas the visitors prefer choice and to be near to the town where they are vacationing and the owners are either supplementing their income or using properties solely for renting. In the PKED area, there is a shortage of commercial

accommodations and virtually no boutique accommodations. PKED has 19 accommodation partners in Trent Lakes. The number of short term rentals in rural areas is growing substantially. Tracie is supportive of licensing short term rentals, as this would also make them eligible to pay a Municipal Accommodation Tax should the Municipality implement it. Legislation from the Province would be beneficial in regulating short term rentals.

Dave Reid, Chair, Economic Development Advisory Committee

Dave outlined current and potential impacts, both positive and negative. He raised the concern that if Trent Lakes does not implement some type of control over STRs, the Municipality will gain a reputation among owners as an “unregulated” place to locate and set up business. He was supportive of sharing the benefits with the short-term rentals. The Working Group discussed having Standards that short term rentals would be required to meet. PKED could provide guidelines in exchange for PKED promoting their business.

John Ewart, Municipal Solicitor

John advised that through zoning, the Municipality can restrict the location of new short term rentals (STRs) to compatible areas, such as areas that permit residential use. Any existing STRs would be considered legal non-conforming. Should the Municipality licence STRs, legal non-conforming STRs would be compliant under the zoning, but the licensing would apply to all STRs. A statutory declaration would be required to confirm the legal non-conforming status.

John advised that any fees need to be reasonable in order to have buy-in from the owners. When considering the fee, it has to bear nexus to what you are providing and what is required to provide the service. The fee should not be used to generate revenue.

Through the Provincial Offences Act, there is a maximum fine that can be laid. Through an Administrative Monetary Penalty (AMP) system, the fees can go directly on the tax roll. This also avoids the lengthy process for a court proceeding. Fines through an AMP system would be through the property owners and any fines must fit the crime.

John recommended a ‘Renters’ Code of Conduct’ that would also contain contact information for the Owner.

John also described a demerit point system. The property owner would have the right to appeal to a quasi-judicial body demerit points or the revoking of a license.

The Municipal Act sets out that a by-law can be challenged if it is ‘unreasonable’ therefore any fees/fines must be appropriate.

John advised that the Municipality should only consider a by-law if they are willing to enforce it. Any by-law that the Municipality passes should be drafted to address the needs of the Municipality. Commercial operations would be exempt from the licencing requirement.

The Municipality could only impose the Municipal Accommodation Tax (MAT). Councillor Armstrong inquired about having the web platform collecting a tax to disperse to the Municipality. The Working Group also discussed having the MAT apply to only STRs. Because MPAC determines the property tax class, the Municipality cannot charge a different tax rate (ie. Commercial) for STR properties.

Any fees charged must be tied to reality. The act of renting out a house as an STR is not a criminal activity, however, if the Municipality passes a licencing by-law, operating without a license would be illegal.

Mayor Clarkson asked about restricting STRs in subdivisions. John referred the Working Group to a decision involving the Town of Puslinch that determined STRs were consistent with a residential use. Therefore, the Municipality would not be able to restrict STRs in any residential zoning.

John advised reviewing all applicable by-laws (noise, fireworks, etc.) to make sure they are complementary to a licencing by-law, not conflicting. A public nuisance by-law could address false complaints.

Louis Melizan, Owner of Three Castles Resort

Louis explained to the working group the rules in place for resort owners to follow in order to operate, including registering for HST, collecting HST, water system inspections and testing, cleaning protocols, etc. He emphasized that there has been little money from the government provided to businesses to serve the growing need and expectations of these establishments.

Leslie Clarkson, Manager of Scotsman Point Resort

Leslie agreed with Louis' points regarding the strict rules in place for resorts. She talked about the Municipal Accommodation Tax (MAT) and the effect that would have on resorts. She said the insurance options are diminishing as they are deemed to be high risk.

Louis and Leslie agreed that a MAT may only push people towards the use of STRs. They also agreed that licencing STRs would help level the playing field. They would like better communication with the local governments about how they can help the resorts grow their business.

Jason Clarke, O.P.P.

Jason explained that the remoteness of some areas in Trent Lakes makes it difficult to respond to noise complaints as the noise may be gone when the O.P.P. are able to arrive. He explained that they generally try and resolve issues without enforcement. He said they respond to similar complaints in this area, especially in the summer, outside of STR properties.

Dave Lavallee, Kawartha Guard Services

Dave provided some background information on the types of issues that are dealt with regarding STRs and that the main issue is a lack of respect. He said they typically get less than 12 complaints per year and they can range from noise, garbage, fire, property lines, fireworks, trailers or dogs. The majority of the complaints are minor in nature and are not serious. He would like to be able to have the contact information for the STR owners and have the owners post a quick reference guide to educate renters. He emphasized noise issues are rarely the main problem, there is typically another root issue.

Lynn Woodcroft, Real Estate Agent

Lynn explained that there are cottage buyers who purchase a property for the sole purpose of an STR. She advised she gets questions from neighbours when she lists a house whether the house will turn into an STR. Lynn suggested going right to the Peterborough County Real Estate Board with any licencing information to make real estate agents aware when they go to buy/sell a property for an STR. Lynn advised the Group that the profile of prospective buyers that want to operate an STR is someone from the GTA who wants the STR to pay the taxes so they will rent out the residence when they are not there. She advised it is also common for people to rent to people they know.

Jenn Brouwer, Short Term Rental Owner

Jenn emphasized that not all STR owners should be painted with the same brush, as each have different rules and regulations for their rentals. Jenn feels her STR creates a unique type of establishment that was missing in the accommodation market. She advised that renters are not the sole cause of problems – some families can be rowdy and she has had her renters complain about the neighbours. She outlined her disinfectant process due to COVID-19 and that any waste from her residences does not go to the Transfer Stations. She has a maximum amount of people per residence and then they are encouraged to get a secondary residence. She also finds out the number of cars and encourages car pooling or provides resources for a shuttle bus/van to

minimize parking impacts. She was supportive of a licensing model. She treats her renters as guests in her home and expects that when 'borrowing her home' they will have respect for the rules, and she takes a security deposit to enforce this. She discussed that she does not feel she is in competition with others in the accommodation market as she offers a unique experience that is not available at resorts/hotels/trailer parks.

Marlys Kerkman, Buckhorn Ratepayers Association

Marlys provided an overview of responses from the Buckhorn Ratepayers Association. She advised the negatives to STRs were increased noise, traffic, ATVs, fireworks, litter, fishing, trespassing, excess wear and tear on the road, and the use of private property (ie. Canoes). The Association recognized that not all of these issues are only from STRs. One response was from a renter that uses a rental agency for their STR.

Christine Brickman, Crystal Lake Community Association

Christine reviewed her presentation which gave an overview of the issues surrounding STRs. She also emphasized the need for a definition for a STR. She outlined different mechanisms which could be implemented to licence STRs and the enforcement techniques which could be used.

Gary Jarosz, Cavendish Community Ratepayer Association

Gary had circulated the discussion topic of STRs to his Association and he received a full spectrum of responses that included both positives and negatives. He emphasized the need to focus on what the problem is that the Municipality is trying to address and focus on finding a solution that will address that problem. He explained that renting is going to happen whether the Municipality licences it or not, however, if a permit/licencing structure is in place, the possibility of getting caught will help to encourage owners to be compliant with the rules and serve as a deterrent. He also emphasized the need for the licence to benefit the STR operators and that the system can't just be punitive.

James Henry, Vice President of Blue Mountain Resorts and member of Blue Mountain's Committee to review their STR by-law

James reviewed his presentation which outlined the planning process Blue Mountains went through to get their STR by-law passed, as well as positive and negatives from their experience. He talked about the focus for Trent Lakes going into detail about the operating parameters, management and enforcement.

Mike Rizzo and Tara Daniels, Short Term Rental Owner

Mike and Tara gave a background of their rental history. They advised that their problems with renters only started occurring recently. Through their STR they promote local entrepreneurs and businesses and employ local people for cleaning and property maintenance. They discussed updating and enforcing by-laws for all residents, not just STRs, and that to avoid a burden on municipal resources, proof of violations should be fact-based and there should be consequences for frivolous complaints. They were supportive of the money collected from licencing being re-invested back into economic development for the community. They advised they take a security deposit and perform reference checks, have invested in two-way talk surveillance cameras with noise tracking, and have neighbours perform spot checks. Their rental contract must include the names of all individuals to be present and must be signed by someone over the age of thirty. They do not permit bachelor(ette) or birthday parties. Their rental contract stipulates times when noise and fires are permitted.

Jon Popple, Manager, Community Standards, Township of Ramara

Jon provided background about the STR issue arising in 2017 in Ramara. An ad hoc committee was formed which presented a draft by-law, built off of the Blue Mountains model, for consideration in early 2019. The by-law was reviewed by the solicitor and eventually passed January 27, 2020. Ramara defines any STR as 28 days or less. Jon's original position was created to oversee the administration and enforcement of the by-law. The fee for the licence is \$1,000.00 annually and involves a complex application and pre-screening process. The applicant is required to provide a floor and site plan (which includes parking) and information on garbage/recycling, snow removal, well and septic, smoke and CO2 detectors. They also require \$2 million liability insurance, upon approval, and the taxes must be paid in full. After the application has been submitted and a preliminary review has been completed, it is circulated to all departments and a site inspection is conducted. The time period for approval is approximately 2-3 weeks. The licence restricts the STR to a maximum of 8 people and requires a person to be appointed and available to attend the property within 1 hour. This contact information is provided on the Ramara website which has resulted in reduced complaint volumes. The applicants are also required to develop a Code of Conduct which must contain certain required information and details on by-laws. Ramara currently has 3.5 by-law enforcement officers who are available 9:00 am – 4:40 pm 7 days a week. They are also considering additional enforcement through either a third-party contract or seasonal employees. Ramara has approximately 70 STRs, 23 have been licenced, 22 are in the process and 25 compliance notices have been issued with 15 receiving fines. They use a third-party to scrub the internet to look for STR properties. Their review of the by-law

recommends a higher fine, as well as a progressive fine system. The licence is valid for one year from the date of issuance and the owners are required to provide quarterly proof of insurance. If the property is sold, the new owner will have to apply for a new licence. They have also established an appeals committee for their demerit point system.

Trent Lakes Short Term Rental Working Group – Discussion on Recommendations

Solution Aspects I think we all agree with:

1. A License Program for Short Term Rentals that imposes prescribed health and safety requirements on properties and involves property inspections.
2. A set of restrictions for STRs, in addition to Bylaw compliance
3. Municipal Administrative Penalties for violation of restrictions and bylaw infractions – with escalating fine amounts. Added to tax bills.
4. A Demerit Point System and a threshold for revoking an STR license
5. Increased Enforcement resources????
6. A Committee of Appeals to address STR challenges to charges
7. ?? A way of dealing with nuisance complaints
8. Public Education and Marketing
9. OTHER???

Questions to answer:

1. WHO needs to get a license?
 - Everyone
 - **Just those that rent out for greater than three (3) OR four (4) weeks per year ?**
 - Only those properties where the owner is in residence for less than 180 days?
 - Only those that advertise on line?
 - Other?
 - **EXCLUDES:** hotels, motels, resorts, cabins/cottages, trailers, campgrounds, b and bs, Other??
1. What are the Application requirements?
 - Owner information and contact information
 - Name and contact information of a responsible person located within 1 hour of property
 - Copy of their Rental Contract
 - Copy of their Code of Conduct and/or Rental Information Package
 - Proof of Insurance
 - Proof of adequate safety equipment for boating and water activities
 - Proof of paid up taxes and hydro bills
1. What inspections and approvals are required for License Approval?
 - Fire inspection
 - Septic inspection
 - Water inspection
 - Parking inspection
 - Building inspection (site plan and floor plan)
 - Adequate life jackets and boat safety equipment

2. What restrictions will be imposed on STRs??
 - # of Guests – 2 per bedroom? 2 Extra? **2 per bedroom and max of 8 total – children <10 not included (PEC)**
 - Minimum # of consecutive days that can be rented ? **5 day rentals?**
 - Permanent Residency Requirement? Owner must be there 180 days per year?
 - # of Vehicles? (minimum of 1 parking space per guest bedroom - Huntsville)
 - **NO commercial functions**
 - **NO party houses**
 - Pets???
 - **Recording of all renter information**

3. Fees and Fines
 - License Fee?? **Flat \$1,000??** \$500 per Bedroom?
 - **Schedule of fines and escalations****
 - **Owner liable for fines and escalations**

4. Demerit Point Schedule and threshold for license revocation
 - # of Points per type of infraction**
 - **# of Points for license to be revoked (OR 3 Bylaw notices to comply – PEC)****
 - Wait time before a revoked licensee can reapply? **2 Years?**

5. Who will enforce STR Bylaws?
 - **311 > Bylaw Officers > OPP > Committee of Appeals**
 - More resources needed???

6. Committee of Appeals
 - **Composition – 5 members, 3 public, 2 Councillors**
 - **Public members with mediation , enforcement experience**

7. Handling of Frivolous complaints??? Consequences?
 - Need a Nuisance Bylaw?
 - Fines?

8. Supporting Documents to be Developed
 - STR Bylaw
 - (Nuisance Bylaw)
 - Revised Relevant Municipal Bylaws
 - “Benefits” brochure for STR owners
 - STR Code of Conduct
 - Sample STR Rental Agreement
 - Info Brochure for Renters in Trent Lakes
 - Website listing of Licensed STRs

**** REFERENCE MUNICIPALITIES**

Fernie

Carrying on business without a licence	\$ 750.00
Advertisement of short-term rental without a licence	\$ 750.00
Failure to respond to a call from the City within 24 hours	\$ 500.00
Failure to provide two (2) parking stalls	\$ 500.00
Failure to clear snow and ice from parking spaces	\$ 250.00

Ramara 15 points to revoke

Points

Fire Protection and Prevention Act, FPPA I 2007/Fire Code Confirmed Order	5
Operating without a licence 3(1)	7
Building Code Act, 1992 BOA (construction without a permit)	7
Sleeping in excess of maximum 8 persons 5(4), 5(9)	5
Non-availability of responsible person 5(1 3)	7
Noise By-law infraction 5(20)	5
Not providing updated information 4(4)	3
Contravention of Site Plan Plan 5(9)	3
Notpostinglicence 5(11)	1
Property standards 5(20)	3
Long grass 5(20)	3
Waste/garbage collection 5(18)	3

Prince Edward County Administrative Penalties

- 1 Section 2.1 Operate STA without a licence. \$1000.00 \$2000.00 \$4000.00
- 2 Section 2.2 Advertise STA without a licence. \$500.00 \$1000.00 \$2000.00
- 3 Section 2.6 Fail to provide copies of required documentation. \$100.00 \$200.00 \$400.00
- 4 Section 2.10 Change or operate STA other than as approved. \$1000.00 \$2000.00 \$4000.00
- 5 Section 4.1g Hosting non-permitted events. \$500.00 \$1000.00 \$2000.00
- 6 Section 7.2 Refusing a By-Law Enforcement Officer entry for inspection. \$300.00 \$500.00 \$1000.00

Huntsville

- 1. Operate any Short-Term rental without a license 3.1 \$400.00
- 2. Advertise an unlicensed short-term rental 3.2 \$400.00
- 3. Violate the renters code of conduct 3.3 \$400.00
- 4. Licensee rent any room other than an approved room 3.5 \$500.00
- 5. Fail to permit an inspection of any land 8.3 \$500.00
- 6. Hinder or obstruct any person from 9.1 \$500.00 performing their duty
- 7. Licensee fail to provide contact information 9.2 \$350.00
- 8. Fail to comply with an order 10.7 \$500.00

