

**1. In your capacity, have you noticed an increase in the need for your service because of Short-Term Rentals?**

**Huron OPP**

Yes – this question would be difficult to quantify void of significant analysis, however, it has been our experience in policing that sometimes, short term rentals/housing can be occupied by individuals who struggle with mental health and addictions. These types of calls for service manifest themselves in mental health crises, over-dose, mischief, neighbour disputes, landlord-tenant disputes, assaults of varying kinds, etc. However, we have also noted, through collaboration with social services and our OPP MCRT (Mobile Crisis Response Team) individuals who have supportive housing gain traction in life toward better outcomes.

**ACW Building Department**

The Building Department has experienced an increase for service due to increased complaints. Most of these complaints involve abuse of the private sewage system, the creation of additional sleeping areas in accessory buildings and within dwellings and more people occupying the building then it was originally designed.

**Lucknow Fire Department**

We currently have no data on response to short term rentals and my experience is low in this area.

**Goderich Fire Department**

We have not seen a large increase for services in our area.

**Conservation Authority**

We have noticed a slight shift in motivations for shoreline re-development. Whilst the majority remains for family cottage use, since 2020 a number of inquiries have been made with an interest in the Lakeshore residential property as an 'income' rather than personal use property. I can recall few if any examples of this prior to 2020.

**2. What are the primary challenges you have experienced in relation to responding to situations that relate to Short-Term Rentals?**

**Huron OPP**

Oftentimes, the police respond to incidents, as mentioned above on a repeated basis. Some municipalities are slow to respond toward eviction or charges – which can

hamper public safety and community wellness. Fair and swift landlord and tenant rights are foundation however some by-laws or occupancy agreements may assist with swift municipal/legal action to prefer charges that see peace maintained and victimization minimized.

#### **ACW Building Department**

These situations are very difficult to respond to as they occur at a certain moment and are resolved once the building is no longer being occupied or used in the same manner.

#### **Lucknow Fire Department**

Primary challenges would be education on by-laws and identifying location and resources during an emergency.

#### **Goderich Fire Department**

The biggest challenge we have seen is renters not being familiar with local bylaws . Mainly regarding open burns or back yard fires. We do see a slight increase in calls for backyard fires during the summer months, Especially when a burn ban is in effect. This is something that the owner needs to clarify with renters as most are not from the area.

#### **Conservation Authority**

Like the natural hazards we regulated, development under the CA Act does not distinguish between types of residential uses (as-in rented vs owner-used). Whilst there maybe concerns of high occupancy by renters, there is no reason what an equivalent number of persons could not attend a single cottage property for a family gathering that is not a rental situation.

### **3. Should the Township consider implementing regulations related to Short-Term Rentals, are there any considerations [your] perspective you feel should be included?**

#### **Huron OPP**

See responses above. The police would covet an opportunity to have in-person discussions with the Township to discuss regulations and provide analytics to inform the crafting of said regulations.

#### **ACW Building Department**

The Building Department supports implementing regulations for short term rentals. Based on the departments extensive experience on the lakeshore and when looking at the natural hazards, lot sizes, type of construction, road standards, private servicing, etc. it appears

that the original intent of lakeshore development was for recreational use and would involve a single generation of a family visiting their cottage on weekends and/or as weather permitted. What we have experienced in recent years is a shift in how the properties on the lakeshore are being used. Today we may see multiple generations of families visiting their property at the same time, structures that have been renovated or reconstructed to a standard equivalent to that of a structure built for year-round occupancy and also the increase in popularity of the rental market known as short term rentals. These changes have created new challenges and pressures on the lakeshore and by regulating short term rentals it is a proactive way to ensure the appropriate occupant load of the buildings, safe operation of private sewage systems, proper building maintenance (guards, stairs, hand rails, etc.), adequate parking to ensure no one is parking on the sewage system and the roads are kept clear for emergency access, safe access egress due to erosion hazards, working smoke and co2 alarms are installed and in the proper locations, private wells are safe to drink, and achieve a duty of care acceptable to both residents and visitors.

#### **Lucknow Fire Department**

I'm not sure what regulations to consider in this area at this time.

#### **Goderich Fire Department**

Short term housing should stricter regulations like Hotels/Motels. From a fire service aspect, the home should be inspected more frequently to ensure proper Fire and life safety aspects have been properly addressed. Fire escape plans, local emergency numbers, proper address number etc.

#### **Conservation Authority**

Enforcement is likely to be a significant hurdle here without abundant staff-resources, and more than likely would become a complaint-led activity for the Township. If it is proposed to formalize rental capacity in a Zoning Bylaw a maximum number of persons may be appropriate to prescribe on a per-cottage situation, and a maximum number of parking spaces could be similarly prescribed. If there is an opportunity to have mandatory information provided to a given renter, MVCA would be pleased to provide additional information about shoreline hazards and how best to exercise caution around them.