Report to Community and Protective Services Committee

To: Chair and Members

Community and Protective Services Committee

From: Scott Mathers, MPA, P. Eng., Deputy City Manager,

Planning & Economic Development

Subject: Short-term Accommodations – Proposed Amendments

Date: May 31, 2022

Recommendation

That on the Recommendation of the Deputy City Manager, Planning and Economic Development, the following actions be taken with respect to the licensing and regulation of Short-term Accommodations:

- a) the proposed by-law attached hereto as Appendix 'A' **BE INTRODUCED** at the Municipal Council meeting on June 14, 2022, to amend the Business Licencing By-law L.131-16 to add a new Schedule including definitions and fees related to the Licensing of Short-term Accommodations; and
- b) the proposed by-law attached hereto as Appendix 'B' **BE INTRODUCED** at the Municipal Council meeting June 14, 2022, to amend the Administrative Monetary Penalty System (AMPS) By-law A-54 to add penalties for non-compliance related to the licensing of Short-term Accommodations.

Summary

On March 29th, 2022 Staff presented proposed amendments to the Business Licensing By-law on the subject of licensing Short-term Accommodations (STAs) and held a public participation meeting. This report addresses several of the questions asked during the meeting and recommends revised amendments to introduce a new licensing category for STAs.

1.0 Background Information

1.1 Previous Reports

- CPSC April 25, 2018 Short-term Accommodations Information Report
- CPSC May 1, 2018 Short-term Accommodations Information Report
- SPPC June 25, 2018 Municipal Accommodation Tax Agreements and By-laws.
- CPSC February 19, 2020 Short-term Accommodations Information Report
- CPSC March 29, 2022 Short Term Accommodations Proposed By-law Amendments
 & Public Participation Meeting (PPM)

1.2 Strategic Plan

The Licensing of Short-term Accommodations is connected to, and supports, the implementation of the 2019-2023 Strategic Plan for the City of London by: 5.1 *Strengthening our Community;* through promotion and support of fire safety through increased public education and prevention, utilizing all the resources of the London Fire Department.

5.2 *Leading in Public Service*; through researching and responding to emerging planning trends and issues.

2.0 Analysis

At the March 29th Public Participation Meeting (PPM), many comments were received regarding the proposed STA amendments. Almost all the 40+/- comments were from operators of STAs who had concerns about the direction of the amendments, specifically the regulation limiting STAs to principal residences. The following are responses to comments received.

i. Can the City require STAs be locally owned?

The City cannot require the owners of STAs to live in London, or within a specific distance from London, but can regulate that the STAs be within a person's principal residence. Such a regulation would meet the intent of local ownership.

ii. Can the City ban or restrict commercial operators or cap the number of licenses?

Similar to (*i*) above, a principal residence regulation would inherently restrict commercial operators. Staff do not recommend putting a cap on the number of licenses issued as there is currently no rationale to suggest such a regulation. There are often undesirable or unintended consequences associated with artificial limits.

iii. Does Ontario Building Code and Property Standards By-law requirements apply to STAs?

Yes, the Ontario Building Code and Property Standards By-law requirements do, and will continue to, apply to STAs. Issues such as ceiling heights and safe egress are based on the municipal purposes of public safety.

iv. How many nuisance complaints can be attributed to STAs?

The City does not code nor note property tenure when receiving complaints regarding matters such as noise and parking. Complaints are investigated based on officer availability, urgency, and risk.

v. Is the City able to regulate STAs through Zoning?

When considering regulating STAs as a land use matter under the Planning Act concerns regarding land use conflicts between residential and commercial uses, and the impact on existing commercial areas and neighbourhoods, would need to be evaluated. An amendment to the Zoning-By-law would be required, and a new definition for STA would need to be developed. Matters of nuisance and safety would still need to be addressed via licensing. No direction has been provided by Council to regulate STAs via zoning, nor do Staff recommend it.

vi. Is a separate unit within a principal residence permitted as an STA?

The Strong Communities through Affordable Housing Act promotes the creation of Second Suites. The spirit of this Act was to increase opportunities for new (affordable) units to be built within existing homes and to help homeowners pay for the increasing cost of housing by taking in tenants. The City responded to this legislation and added regulations to the Zoning By-law to regulate "additional residential units". As indicated in previous reports on this subject and supported by Housing Division, there are housing supply and affordability issues in London affecting both homeowners and tenants.

The idea that one additional unit on the same property as a principal residence could be used as an STA to help homeowners subsidize the costs associated with their principal residence is a justifiable consideration. As highlighted by comments received at the March 29th PPM, nuisances are generally diminished when STAs are restricted to principal residences; this logic could be extended to include secondary units within, or on the same property as, one's principal residence.

vii. What about allowing homeowners one additional property as an STA?

Similar to the idea of permitting a secondary dwelling on the same property as an STA, the idea of allowing a homeowner to have one additional dwelling not on the same property was discussed. Staff do not believe allowing permanent residents one additional but separate STA property has merit. It exacerbates the issues of housing supply, affordability, and potential nuisances.

viii. Are additional staff required to implement these regulations?

Key to the original draft By-law amendment presented at the PPM, Staff indicated that due to the principal residence regulation, STAs would be relatively easy to monitor, review, identify, enforce, and regulate, without creating additional staffing needs. In fact, it is possible that a principal residence requirement could reduce the total number of short-term accommodations and - potentially - reduce the number of nuisance calls, investigations, and charges staff are involved with annually.

Depending on the Council decision, if there are some additional needs for staffing, all associated costs would be covered by licensing fees. As with any bylaw amendment, we will still require the finalization of administrative procedures prior to the issuance of licences, and there will be an initial period of education during implementation which can be resource intensive at the beginning.

ix. Will STAs be required to collect and remit Municipal Accommodation Tax?

Yes, STAs will be required to collect and remit Municipal Accommodation Tax (MAT). MAT is currently being collected for all hotel and motel stays in the City of London by the Ontario Restaurant, Hotel & Motel Association (ORHMA) and from an equity standpoint - as licensing is introduced - STAs will also be required to collect and remit MAT. Civic Administration will bring forward a future report addressing any necessary amendments to the MAT By-law as well as details on the collection process.

3.0 Revised Recommendations

Licensing Providers:

Staff are of the opinion that it is reasonable and desirable to consider allowing one additional dwelling unit on the same property as one's principal residence to be used as an STA. This recommendation would be in keeping with the Provincial and municipal desires to increase the supply of new dwelling units, and to help homeowners pay for the escalating costs of housing by taking in tenants on a short, or long-term, basis.

It is anticipated that this opportunity would increase the number of additional units created in London and although they may be used as short-term accommodations in the interim, they could potentially convert to longer-term rentals in the future.

Allowing one additional STA on the same property as one's principal residence should not increase the nuisance issues reported in residential neighbourhoods that are more often associated with commercially operated STAs without a landlord present.

Licensing Platforms:

It has been deemed worthwhile and necessary to expand the licensing of STAs to include the platforms on which these accommodations are advertised, and the stays brokered. This will allow for strengthened compliance with by-law regulations, specifically in the brokering of accommodations and data keeping requirements for units by brokers.

This approach is in line with several Ontario municipalities' management of Short-term Accommodations and has proven to be successful in the regulation of *Transportation Network Companies* and private vehicles-for-hire, which use similar brokering methods.

<u>Timing of Implementation:</u>

As with the introduction of any new by-law amendment, there is an initial period of preparation, education, and consultation regarding operational regulations, administrative organization, and system modifications. This process will take approximately three months. During the implementation period existing STAs not in immediate compliance with by-law regulations will be given an opportunity to voluntarily comply with the new licensing requirements.

Conclusion

The licensing of STAs is something that has been occurring throughout Canada, and globally, as the popularity of STAs continues to expand. The direction recommended in these amendments helps to ensure that STA platforms and hosts act responsibly regarding the services they are providing. The approach also creates an opportunity for homeowners and tenants to earn additional income in the short-term rental economy.

The licensing of these businesses requires that platforms and hosts be aware of their responsibilities. The proposed regulations help protect the character, amenity, and quality of existing residential neighborhoods and improve the safety of the travelling public that choose to stay in someone's principal residence.

From a longer-term perspective, the licensing of short-term accommodations may help reduce the number of rental units that are removed from the rental market for short-term stays.

Prepared by: Ethan Ling MSc.

Development Policy Coordinator, Municipal Compliance

Submitted By: Nicole Musicco,

Coordinator, Municipal Compliance

Reviewed &

Concurred by: Orest Katolyk, MPL, MLEO(C),

Director, Municipal Compliance

Recommended by: Scott Mathers, MPA, P. Eng., Deputy City Manager,

Planning and Economic Development

Appendix "A"

Draft By-Law Short-term Accommodations

Bill No. - 2022

By-law No. L.-131(___)-___

A by-law to amend By-law No. L.-131-16 entitled "A by-law to provide for the Licensing and Regulation of Various Businesses".

WHEREAS subsection 5(3) of the Municipal Act, 2001 provides that a municipal power shall be exercised by by-law;

AND WHEREAS section 23.2 of the Municipal Act, 2001 permits a municipality to delegate certain legislative and quasi-judicial powers;

AND WHEREAS the Council for the City of London considers it necessary and desirable for the public to regulate the licensing of short-term accommodations for the purpose of protecting the health and safety of persons using short-term accommodations, for ensuring that short-term accommodations do not create a nuisance to the surrounding properties and neighbourhoods, and to protect the residential amenity, character, and stability of residential areas;

AND WHEREAS it is deemed expedient to amend By-law No. L.-131-16, entitled "A by-law to provide for the Licensing and Regulation of Various Businesses", passed on December 12, 2017;

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

- 1. The Business Licensing By-law L.-131-16 is amended by adding "Short-term Accommodation" as a new Schedule XX to the Business Licensing By-law.
- 2. The Business Licensing By-law L.-131-16, Schedule 1, "Business License Fees" is amended by adding the new category "Short-Term Accommodation Provider" and by adding an Annual License Fee of \$175.00
- 3. The Business Licensing By-law L.-131-16, Schedule 1, "Business License Fees" is amended by adding the new category "Short-Term Accommodation Broker" and by adding an Annual License Fee of \$1000.00

SCHEDULE XX SHORT-TERM ACCOMMODATIONS

1.0 DEFINITIONS:

"**Dwelling**" means one or more habitable rooms designed, occupied, or intended to be occupied as living quarters.

"Person" includes a corporation.

"Resident Address" means the place at which an individual habitually sleeps, eats, keeps their personal effects, and has a regular place of lodging; an individual may have only one Resident Address.

"Short-term Accommodation" means a temporary accommodation in all or part of a Dwelling that is provided for 29 consecutive days or less in exchange for payment including a bed and breakfast, but not including a hotel, motel, inn, resort, hostel, lodging house, or rooming house.

- **"Short-term Accommodation Broker"** means any individual, partnership, or corporation that, for compensation, markets and brokers the booking, reservation, or rental, of a Short-term Accommodation on behalf of a Short-term Accommodation Provider by means of a website or digital application.
- "Short-term Accommodation Provider" means an individual who, for compensation, makes available Short-term Accommodation, but does not include a Short-term Accommodation Broker. For purposes of this definition, this does not include a corporation or partnership.

2.0 LICENCE CATEGORIES

- 2.1 The following categories of licenses are established:
 - (a) Short-term Accommodation Provider Licence, and;
 - (b) Short-term Accommodation Broker Licence.

3.0 POWERS OF THE LICENCE MANAGER

- In addition to any other power, duty, or function prescribed in this By-law, the Licence Manager may, under this Schedule.
 - (a) Prescribe the manner, form, content, and inspection protocol for records to be kept by the Short-term Accommodation Provider and by the Short-term Accommodation Broker;
 - (b) Prescribe the form and content of municipal information that is to be provided, displayed, and made available by the Short-term Accommodation Provider, and by the Short-term Accommodation Broker;
 - (c) Prescribe operational regulations regarding potential public nuisance, health and safety, and property standards matters for the Short-term Accommodation Provider, and for the Short-term Accommodation Broker.

4.0 EXCLUSIONS

- 4.1 For greater certainty, the following are not considered as Short-Term Accommodation for the purposes of this Schedule:
 - (a) accommodation provided by:
 - (i) a hotel; motel; inn; resort; hostel; lodging house; or rooming house;
 - (ii) a university or college of applied arts and technology and postsecondary institution;
 - (iii) a hospital under the Public Hospitals Act and every private hospital operated under the authority of a licence issued under the Private Hospitals Act;
 - (iv) a long-term care home as defined in subsection 2(1) of the Long-Term Care Homes Act, 2007;
 - (v) a treatment centre that receives provincial aid under the Ministry of Community and Social Services Act;
 - (vi) a house of refuge, or lodging for the reformation of offenders;
 - (vii) a charitable, non-profit philanthropic corporation organized as shelters for the relief of the poor or for emergency;

- (viii) a hotel or motel room used by the City or its agents for shelter accommodation purposes;
- (ix) a campground, tourist camp, or trailer park;
- (x) employers to their employees in premises operated by the employer.

5.0 APPLICATION FOR SHORT-TERM ACCOMODATION PROVIDER LICENCE

- 5.1 In addition to all of the requirements set out in this By-law, every application for a Short-Term Accommodation Provider Licence shall include the following:
 - (a) the Applicant's sworn declaration, satisfactory to the Licence Manager:
 - (i) attesting that the Applicant is an individual (and not a corporation);
 - (ii) attesting that the Applicant is at least eighteen (18) years of age:
 - (iii) stating the municipal address where the Short-term Accommodation will be operated;
 - (iv) attesting that the municipal address where the Short-term Accommodation will be operated is also the Resident Address of the Applicant;
 - (v) stating the number of units, and the number of bedrooms, that will be offered as Short-term Accommodations that will be operated by the Applicant;
 - (vi)including a copy of government-issued identification showing the Applicant's Resident Address, and;
 - (vii) attesting that the Short-term Accommodation complies with all applicable laws, regulations, and by-laws, including the Zoning By-law, the Property Standards By-law, the Fire Protection and Prevention Act, and The Building Code Act.
 - (b) where the Applicant owns the Dwelling in which the Short-term Accommodation is located, provide proof satisfactory to the Licence Manager that the Applicant owns the Dwelling;
 - (c) where the Applicant is a tenant in the Dwelling in which the Shortterm Accommodation is located, provide proof satisfactory to the Licence Manager that the owner of the Dwelling permits the operation of the Short-term Accommodation;
 - (d) where the Applicant owns or is a tenant in a Dwelling that is a condominium unit, provide proof satisfactory to the Licence Manager that the condominium board permits the operation of a Short-term Accommodation in the condominium unit;
 - (e) the email address of the Applicant;(f) original documents from the issuince
 - original documents from the issuing agency outlining the results of a Criminal Record and Judicial Matters Check, dated less than ninety (90) days prior to the date of application, and satisfactory to the Licence Manager;
 - (g) payment of any other applicable fees, taxes, outstanding Administrative Monetary Penalties or invoices;
 - (h) an insurance certificate demonstrating general liability insurance for the operations of the proposed Short-term Accommodation against claims filed against the applicant with respect to bodily injury, including personal injury and death, and property damage with a per occurrence limit of at least \$5,000,000;
 - (i) the Applicant will provide an indemnity in favour of the City from and against claims, demands, losses, costs, damages, actions, suits, or proceedings that arise out of, or are attributable to, the Short-term Accommodation, which shall be in a form satisfactory to the Licence Manager, and conditional on a Licence being issued;
 - if an agent is making the application on behalf of an Applicant, they
 must provide written proof satisfactory to the Licence Manager that
 the agent has been delegated the authority to act as the Applicant's
 agent, and;

(k) any other information, affidavits or documents reasonably required by the Licence Manager.

6.0 Application for Short-Term Accommodation Platform Licences

- 6.1 In addition to all of the requirements set out in this By-law, every application for a Short-Term Accommodation Broker Licence shall include the following:
 - (a) if the Applicant is a corporation, an updated certified copy of an annual return with a list of shareholders of the corporation;
 - (b) if the Applicant is an individual, original documents from the issuing agency outlining the results of a Criminal Record and Judicial Matters Check, dated less than ninety (90) days prior to the date of application, and satisfactory to the Licence Manager;

(c) if the Applicant is an individual, proof that the Applicant is at least eighteen (18) years of age;

- (d) the address of a place of business in the Province of Ontario, which is not a post office box, to which the Licence Manager may send any notice or documentation or communication that may be required under this By-law and at which the Applicant or the Applicant's agent will accept receipt of such notice, documentation or communication;
- (e) the name, telephone number and email address of a designated representative;
- (f) if an agent is making the application on behalf of an Applicant, they must provide written proof satisfactory to the Licence Manager that the agent has been delegated the authority to act as the Applicant's agent;
- (g) an insurance certificate demonstrating general liability insurance for the operations of the proposed Short-term Accommodation Broker against claims filed against the applicant with respect to bodily injury, including personal injury and death, and property damage with a per occurrence limit of at least \$5,000,000;
- (h) the Applicant will provide an indemnity in favour of the City from and against claims, demands, losses, costs, damages, actions, suits, or proceedings that arise out of, or are attributable to, the Short-term Accommodation, which shall be in a form satisfactory to the Licence Manager, and conditional on a Licence being issued, and;
- (i) any other information, affidavits or documents reasonably required by the Licence Manager.

7.0 CONDITIONS TO HOLD A LICENCE

- 7.1 In addition to all the requirements set out in this By-law, every holder of a Short-term Accommodation Provider Licence is subject to the following conditions of obtaining and continuing to hold a licence:
 - (a) shall ensure that the municipal address of the Short-term Accommodation is also the Resident Address of the Short-term Accommodation Provider;
 - (b) shall ensure that Short-term Accommodation is provided at the same municipal address for which the Short-term Accommodation Provider Licence was issued;
 - (c) shall not operate more than two Short-term Accommodations
 - (d) shall not offer more than five bedrooms as Short-term Accommodation;
 - (e) shall post and include the valid Short-term Accommodation Provider Licence number in a conspicuous place and within any medium or material used to market, advertise, or broker the Shortterm Accommodation;
 - (f) shall provide to every guest staying in the Short-term Accommodation a local emergency contact of a person available during the guest's entire rental period;
 - shall post any and all "Fire Safety" material, provided by the London Fire Department, within the Short-term Accommodation at the locations and in the manner specified;
 - (h) where a Short-term Accommodation Broker is not used, shall promptly issue an invoice, contract, receipt, or similar document to

all guests that includes the Short-term Accommodation Provider's valid licence number, the nightly and total price charged for each individual rental including any Municipal Accommodation Tax, and any other information prescribed by the Licence Manager;

shall maintain insurance as required under section 5.1 of this Schedule, and file with the Licence Manager at least five (5) days prior to the expiry date of any current insurance policy an insurance renewal policy or certificate of insurance, and;

(j) shall provide an indemnity in favour of the City from and against claims, demands, losses, costs, damages, actions, suits, or proceedings that arise out of, or are attributable to, the Short-term Accommodation, which shall be in a form satisfactory to the Licence Manager.

- 7.2 In addition to all the requirements set out in the By-law, every holder of a Short-term Accommodation Broker Licence is subject to the following conditions of obtaining and continuing to hold a license:
 - (a) shall include in a conspicuous place on every listing of a Short-term Accommodation, the current and valid Short-term Accommodation Provider licence number issued with respect to the Short-term Accommodation:
 - (b) shall maintain insurance as required under section 6.1 of this Schedule, and file with the Licence Manager at least five (5) days prior to the expiry date of any current insurance policy an insurance renewal policy or certificate of insurance;
 - (c) shall provide an indemnity in favour of the City from and against claims, demands, losses, costs, damages, actions, suits, or proceedings that arise out of, or are attributable to, the Short-term Accommodation, which shall be in a form satisfactory to the Licence Manager, and;
 - (d) shall issue an invoice, contract, receipt, or similar document to all guests that includes the Short-term Accommodation Provider's Licence number, the nightly and total price charged for each individual rental, including any Municipal Accommodation Tax, and any other information reasonably required by the Licence Manager.

8.0 PROHIBITIONS

- 8.1 No Person shall own or operate a Short-term Accommodation without holding a current valid Short-term Accommodation Provider Licence issued under this By-law.
- 8.2 No Person shall operate as a Short-term Accommodation Broker without holding a Short-term Accommodation Broker Licence issued under this By-law.
- 8.3 No Person shall operate, advertise, broker, carry on the business of, or permit the operation, advertising, brokering or carrying on the business of a Short-term Accommodation in a Dwelling unless it is the Person's Resident Address.
- 8.4 No Person licensed as a Short-term Accommodation Provider shall operate, advertise, broker, carry on the business of, or permit the operation, advertising, brokering, licensing, or carrying on the business of more than two Short-term Accommodations at the same time.
- 8.5 No Person shall advertise, provide, broker, or market a Short-term Accommodation without prominently displaying the Short-term Accommodation Provider Licence number issued with respect to the Short-term Accommodation.
- 8.6 No Person shall advertise or offer Short-term Accommodation at a municipal address that is not the Resident Address of the Short-term Accommodation Provider.
- 8.7 No Person who advertises a Short-term Accommodation that is not in compliance with this By-law shall fail to forthwith cease to so advertise,

and remove such advertising.

- 8.8 No Person who operates a Short-term Accommodation shall use the services of a Short-term Accommodation Broker that is not licensed in accordance with this By-law.
- 8.9 No Short-term Accommodation Provider and no Short-term Accommodation Broker shall:
 - (a) book or reserve more than two (2) unrelated or unassociated individuals as separate guests at the same Short-term Accommodation at the same time;
 - (b) offer or provide more than 5 bedrooms as Short-term Accommodations at the same Dwelling at the same time;
 - (c) contravene or fail to comply with a term or condition of their Licence imposed under this By-law; or
 - (d) operate or advertise a Short-term Accommodation while the Licence issued under this By-law is under suspension.
- 8.10 No Short-term Accommodation Broker shall advertise a Short-term Accommodation without prominently displaying the Short-term Accommodation Provider Licence number issued with respect to the Short-term Accommodation.

This by-law shall come into force and effect on the day it is passed.

PASSED in Open Council on Month, Day, 2022

Ed Holder Mayor

Michael Schulthess City Clerk Bill No. ## 2022

By-law No. A-54-

A by-law to amend By-law No. A-54, as amended, being "A by-law to implement an Administrative Monetary Penalty System in London" to provide for an amended Penalty Schedule "A-5" for the Business Licensing By-law for the category of Short-term Accommodations.

WHEREAS section 434.1 of the Municipal Act authorizes the City to require a person, subject to conditions as the municipality considers appropriate, to pay an administrative penalty if the municipality is satisfied that the person has failed to comply with a by-law of the municipality;

AND WHEREAS the Municipal Council considers it desirable to enforce and seek compliance with the designated by-laws, or portions of those by-laws, through the Administrative Monetary Penalty System;

AND WHEREAS the Municipal Council on June 25, 2019 passed By-law No. A-54, being "A by-law to implement an Administrative Monetary Penalty System in London:"

AND WHEREAS the Municipal Council deems it appropriate to amend Bylaw No. A-54 with respect to Schedule "A-5" for the category of Short-term Accommodations.

NOW THEREFORE the Council of The Corporation of the City of London enacts as follows:

7 That Schedule "A-5" of By-law No. A-54, being the Penalty Schedule for Business Licensing By-law be amended to include the following rows, after row 154:

Column	Column 2	Column 3	Column 4
1	Short Form Wording	Designated	Administrative
Item #		Provision	Penalty
			Amount (\$)
155	Operate without a current valid Short-		500.00
	term Accommodation Provider licence.		
156	Contravene or fail to comply with By-law		300.00
	regulation – to wit		
157	Contravene or fail to comply with		300.00
	administrative regulation – to wit		
158	Operate without a current valid Short-		500.00
	term Accommodation Broker licence.		

At the discretion of the Officer, fines may be doubled for any and all subsequent repeat offences.

8 This by-law shall come into force and effect on the day it is passed.

PASSED in Open Council on Month, Day, 2022

Ed Holder Mayor

Michael Schulthess City Clerk

Appendix 'C'



SAFETY TIPS

- Working smoke alarms are in every sleeping room. They are outside each separate sleeping area. They are on every level of the home.
- Working smoke alarms are interconnected, if possible.
 When one alarm sounds, they all sound.
- Portable fire extinguishers are in the home and are easy to reach.
- Working carbon monoxide alarms are outside each separate sleeping area. They are on every level of the home and in other locations as required by laws, codes, or standards.
- The owner has posted a floor plan. It notes all escape routes and exits and provides emergency contact information.
- Everyone knows the address of the home.
- Everyone staying in the home has identified two ways out of every room and how to escape in an emergency.
- All doors and windows that lead outside are able to be opened.
- An outside meeting place has been chosen. It is a safe distance away from the home.
- Everyone knows how to call 9-1-1 or the local emergency number from a cell phone from outside.
- If smoking is allowed, a smoking area has been designated and is well away from the structure. Deep, sturdy ashtrays have been provided.
- All pathways are free and clear of tripping hazards.
- Electrical outlets are free from multiple cords and adaptors.
- The stovetop is clear. Anything that can catch fire is not near the stovetop, such as curtains and towels.

WINDOW AND DOOR ALERT!

Be on the lookout for rooms with tiny windows. These are too small to serve as a means of escape.

Security bars on doors and windows can trap people in a fire. Make sure any security bars have quick-release devices. Tools, keys, or special efforts should not be needed to open them.

KNOW BEFORE YOU GO

Peer-to-peer hospitality services are not regulated in the same way as hotels. Requirements vary widely across jurisdictions. Do your homework before making a reservation. Check online to see your travel destination's regulations for rental properties. Ask your host if the property meets the regulations. Discuss other safety concerns you may have.

Check the forecast in case of storms that could cause power outages; assure the property has equipment (batteries, lanterns, etc.) in the event of a power outage.



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