

Business Licence (Short-term Rental) Appeal re 402-960 Yates Street

Submission of the Licence Inspector

I. Introduction

1. This is an appeal from the decision of the Licence Inspector to refuse to issue a business licence to Tanya Dodd (the appellant) for the operation of a short-term rental at 402-960 Yates Street.
2. The business licence was denied pursuant to section 4(b) of the Short-term Rental Regulation Bylaw, which states:
 1. *The Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector, ...*
 - (a) *the applicant failed to comply with section 3; or*
 - (b) *the short-term rental operation would contravene a city bylaw or another enactment.*
3. The appeal is brought pursuant to section 60(5) of the Community Charter, which requires that an applicant for a business licence has the right to have a staff decision to refuse such licence reconsidered by Council.
4. On a reconsideration such as this, Council can apply its own judgement and may either uphold the decision to refuse the licence or grant the licence.

II. Summary

The 2025 application for a short-term rental business licence at 402-960 Yates Street was denied because the appellant failed to provide evidence, satisfactory to the Licence Inspector, that 402-960 Yates Street is their principal residence. The licence history, rental history, rental plan, 2025 site inspection, and statements made by the appellant show the unit is not a principal residence.

The appellant was licenced and operated a non-principal short-term rental in the unit from June 6, 2023, until May 1, 2024, after which the appellant successfully applied and received a 2024 principal licence. May 1, 2024, is when non-principal licences were no longer permitted. The successful change of licence was based on the appellant claiming a change of circumstance, revised operating plans, and assurances to operate within the requirements for a principal short-term business licence.

For 2025, the application from the appellant was reviewed and subsequently denied due to an abundance of information and evidence that showed the unit was not a principal residence. The appellant was contacted to arrange a site inspection by a bylaw officer in January 2025. It was learned that the unit was under significant remediation due to water damage in 2024, consequently staff recommended that the inspection be scheduled for a

date after the remediation, however the appellant preferred to have the inspection done as that was a date for when she was available. During the inspection, it was determined that the appellant was not living there and claimed to be living in different hotels. This clearly identified the unit was not a principal residence at the time of inspection. Further, it was stated by the appellant that she was going to live in Mexico and use a property manager for the short-term rentals. The site inspection also revealed, in the areas not affected by the water damage, that were a minimal number of items that would normally be associated with someone living in a principal residence. The 2023 and 2024 history of the unit having operated as a non-principal resident short-term rental is also an indication, albeit not a certainty, that the unit would continue to operate a non-principal short-term rental. The application for 2025 stated that the appellant was living in Mexico with their father and operating full time and peak season rentals as their main source of income. This may have allowed the appellant to operate the short-term business within the allowed number of days, but it does not satisfy the requirement for the property be a principal residence. The application also included insurance policy documents that describe the coverage as being for short-term renters and did not describe coverage for a principal residence.

The claim that the property is a principal residence is not satisfactory in consideration the information and evidence.

III. Facts

5. The appellant has owned the property at 402-960 Yates Street since July 9, 2018.
6. The property is zoned R3-C-Y (Central Area Residential Yates Street District). This zone does not permit short-term rentals except as a 'home occupation' under Schedule 'D'.
7. On June 6, 2023, the appellant applied for a 2023 principal resident short-term rental licence at 406-960 Yates Street.
8. June 21, 2023, a Bylaw Officer inspected the home. The purpose of the inspection was to understand the layout of the home and business plan for a potential short-term rental. The Bylaw Officer was led through the inspection by the appellant. The inspection revealed a two bedroom and two-bathroom condominium. The appellant informed the Bylaw Officer the intention was to rent the whole home 'every couple of weeks'. The appellant informed the Bylaw officer she was recently diagnosed with an auto-immune disorder and is no longer able to work. The appellant stated she would be residing in Mexico with her father and renting the unit as a source of income [Appendix C].
9. On June 21, 2023, the application was reviewed in full including the results of the inspection on June 21, 2023. The inspecting Bylaw Officer recommended the application be denied, as the appellant's business plan did not align with the regulations of a principal resident licence. The property had legal non-conforming status related to short-term rental activity, that would permit the City to issue a non-principal resident licence. The Licence Inspector determined that the application 2023 principal resident short-term

failed to meet the requirements set out in the *Short-Term Rental Regulation Bylaw* and *Schedule D – Home Occupations* [Appendix A-D].

10. On June 22, 2023, the City notified the appellant of the Licence Inspector's decision to deny their 2023 principal resident short-term rental licence [Appendix E].
11. On June 27, 2023, the appellant contacted the City by phone to speak with staff regarding the decision to deny their 2023 principal resident short-term rental licence. The appellant expressed their frustration regarding the denial. City staff explained that short-term rentals are permitted in a operator's principal residence as a home occupation, that the entire principal residence may be used only occasionally while the operator is temporarily away. The volume of rentals the appellant wanted to operate, exceeded the occasional use exception as a home occupation. Staff informed the appellant if they wanted to revise their business plan and provide it to staff for review. The appellant stated she would consider the option but that she was only required to be home once a month for treatments [Appendix D].
12. On June 27, 2023, the appellant contacted City staff requesting the application be reconsidered. The appellant stated that they would operate within the occasional use exemption and, if this changes, would apply for a non-principal resident licence [Appendix F].
13. On June 30, 2023, City staff responded to the appellants communication and requested details outline the proposed business plan to ensure compliance with the City of Victoria regulations [Appendix F].
14. On June 30, 2023, the appellant responded to staff and provided a detailed business plan to operate the whole home as a short-term rental. The appellant stated they wished to operate one booking in August, one booking in October and two bookings in November. The appellant reiterated if they wished to operate more, they would apply for a non-principal resident licence [Appendix F].
15. On June 30, 2023, the appellant's revised business plan was reviewed in combination with the June 21, 2023, inspection results and the Licence Inspector granted the 2023 principal resident licence [Appendix A-F].
16. On August 16, 2023, City staff identified the appellant's listing offering a 2-night minimum stay hosted by a property manager. The calendar reflected a widely available calendar from August 2023 to May 2024 [Appendix G].
17. On September 9, 2023, the appellant contacted City staff requesting to change to a non-principal resident licence type. The appellant stated their short-term rental was going well and they wished to operate unrestricted [Appendix F].
18. On September 13, 2023, the appellant was issued a 2023 non-principal resident short-term rental licence.

19. On December 28, 2023, the appellant applied for a 2024 principal resident short-term rental licence at 406-960 Yates Street.
20. On December 28, 2023, City staff contacted the appellant to schedule an inspection, offering two of the next available dates [Appendix H]
21. On December 28, 2023, the appellant responded to City Staff and requested the submitted application for a 2024 principal resident short-term rental licence be changed to non-principal resident short-term rental licence [Appendix H].
22. On January 8, 2024, the appellant was issued a 2024 non-principal resident short-term rental licence.
23. On February 20, 2024, the appellant applied for a 2024 principal resident short-term rental licence. The appellant stated they wished to apply for a principal residence licence in anticipation of the provincial regulations effective May 1, 2024. The appellant stated they would operate with their non-principal resident licence type until May 1, 2024 [Appendix I].
24. On March 27, 2024, City staff contacted the appellant to schedule an inspection and offered the first two available appointments. The appellant informed staff the property was occupied during the proposed times and inquired whether an inspection was necessary. City staff clarified an inspection was required. City staff provided the appellant with options before the appellant accepted an inspection appointment for May 8, 2024, that fit their schedule [Appendix I].
25. On May 8, 2024, a Bylaw Officer inspected the home. The purpose of the inspection was to understand the layout of the home and business plan for a potential short-term rental. The Bylaw Officer was led through the inspection by the appellant. The Bylaw Officer documented the two-bedroom unit and obtained the appellant's business plan. The appellant stated they wished to offer the whole home while away for one week at a time. The appellant stated all spaces would be offered except for the closets, which would be locked. The appellant stated there was no set plan but that she would be travelling and a property manager that would be responsible for the business activity [Appendix J].
26. Between May 8 and May 24, 2024, the application was reviewed in full including the results of the inspection on May 8, 2024, open-source data and internal records. The review raised some concerns, primarily due to the unusual circumstances and the limited information to verify the appellant's declarations. The Licence Inspector took note that while the Bylaw Officer observed some personal items in the unit upon the May 8, 2024, inspection, the contents still appeared to be quite minimal. The appellant declared that the closets, where the personal items appeared to be, would be locked during the rental activity. However, the unit as whole appeared ready to receive accommodations. The Licence Inspector considered the appellant's personal circumstances and their previous declarations and transparency regarding their transient lifestyle. The Licence Inspector acknowledged the appellant demonstrated a clear understanding of the City of Victoria regulations and provided a business plan reflective of occasional rentals. Given the

understanding, the Licence Inspector found it reasonable that the appellant was being truthful in the claims regarding eligibility and compliance with the City of Victoria Regulations, and the Licence Inspector granted the licence [Appendix A-D, G, J].

27. On May 24, 2024, the appellant was notified that their 2024 Principal Resident Short-Term Rental licence was approved.
28. On January 5, 2025, the appellant applied for a 2025 principal resident short-term rental licence [Appendix K].
29. On January 6, 2025, the appellant's 2025 principal resident short-term rental licence application was reviewed preliminarily by staff. The insurance policy documents submitted in the application reflected the occupancy of 402-960 Yates Street was rented to others short-term [Appendix K].
30. On January 9, 2025, City staff contacted the appellant to schedule an inspection, offering two of the next available dates [Appendix L].
31. On January 10, 2025, the appellant responded to staff confirming an inspection appointment for January 30, 2025 [Appendix L].
32. On January 24, 2025, the appellant contacted staff stating the unit was being repaired due to a recent flood. The appellant asked staff if it was still possible to proceed with the inspection [Appendix L].
33. On January 24, 2025, City staff informed the appellant they could not make that determination for the appellant and suggested connecting with their insurance company or other hired professional to obtain an assessment of their circumstances. The City staff informed the appellant to respond if the inspection needed to be rescheduled [Appendix L].
34. On January 24, 2025, the appellant responded to staff seeking clarification whether the results of the inspection would be negatively impacted due to the unit's current condition. The appellant stated they would prefer to proceed with the scheduled appointment, but only if it would not impact the licensing decision [Appendix L].
35. On January 24, 2025, City staff responded to the appellant stating that an outcome of an inspection cannot be predicted. However, staff reiterated the intention of the inspection is to assist in establishing eligibility and obtain the business plan. The appellant was informed if they believed their current circumstances would impact their inspection, the appointment could be rescheduled [Appendix L].
36. On January 24, 2025, the appellant informed staff they would proceed with the inspection scheduled on January 30, 2025 [Appendix L].
37. On January 30, 2025, a Bylaw Officer inspected the home. The purpose of the inspection was to understand the layout of the home and business plan for a potential short-term rental. The Bylaw Officer immediately observed the unit was under construction. The appellant informed the Bylaw Officer that the unit had flooded twice in 2024, and the

current repairs would be completed by March. The Bylaw Officer recorded their observations of the unit, stating that the bedrooms and bathrooms were under heavy construction and not usable in the current condition. The Bylaw Officer observed the primary bedroom and ensuite to be unfurnished and unusable. The guest bedroom contained an advertisement sign for the property manager. All the furniture in the living room was pushed to the middle of the room and contained bags of clothing and other items piled on the furniture. The appellant informed the Bylaw Officer they had been sleeping on the couch. The Bylaw Officer replied, "Well you're not living here full time, because it's under construction, so where are you staying". The appellant replied they were 'bouncing from hotel to hotel'. The Bylaw Officer asked the appellant "So this is your principal residence but not the place you're currently using as your principal residence". In response, the appellant slightly avoided the question by affirming the unit was their principal residence and asking the Bylaw Officer how that could be questioned. The Bylaw Officer responded stating the unit could be her principal residence, but that the appellant was not living there currently due to the construction. The Bylaw Officer recorded the appellant did not reply to their response. The Bylaw Officer asked the appellant about their business plan. The appellant informed the Bylaw Officer the intention was to operate the whole home up to 160 nights a year. The appellant stated due to personal circumstances and an autoimmune diagnosis; she would go live in Mexico with her father so the unit could operate as short-term rentals. The appellant stated that the intention was to increase potential profits by renting in peak season. The appellant informed the Bylaw Officer the unit would be rented at a 2-night minimum stay, and the business operation would be conducted by a property manager. The appellant asked the Bylaw Officer if the notification regarding the licence approval would be sent by email, should she not be in the City to receive it. The Bylaw Officer noted it was challenging to decipher if the unit was the appellant's resident given it's current condition but stated the unit was not currently being used as a principal residence [Appendix M].

38. Between January 30 and February 6, 2025, the application was reviewed in full including the results of the inspection on May 8, 2024, open-source data and internal records. The Licence Inspector acknowledged there were few personal effects in the unit upon the January 30, 2025, inspection, and that while the property is currently under construction due to flooding, the May 8, 2024, inspection revealed similar findings, that the property contained minimal personal items. The Licence Inspector noted the inspecting Bylaw Officer's observations regarding the appellant's avoidance in responding to the unit being their principal residence. While the appellant claims the property is their principal residence, it more appears that the unit is owned by them and at times occupied for personal use. The appellant's insurance policy explicitly states that the property's occupancy is 'rented to others – short-term'. Additionally, the appellant declared they would be residing in Mexico with their father, a statement that aligns with provided during the June 21, 2023, inspection. During the January 30, 2025, inspection, the appellant plainly stated their intention is to operate short-term rentals to the maximum allowance. The appellant's communication and business plan reflect an intention to operate the property as a rental, which matches the appellant's insurance policy documents stating the use is a rental. As a principal resident short-term rental licence requires the premise

to be the operator's principal residence, and the onus falls solely to the applicant to prove eligibility, the licence was denied [Appendix A-M].

39. On February 7, 2025, the Licence Inspector advised the appellants that the application for a 2025 principal resident short-term rental licence at 502-960 Yates Street had been rejected as it failed to meet the requirements set out in the *Short-Term Rental Regulation Bylaw* and *Schedule D – Home Occupations* [Appendix N].

IV. Relevant Regulation

40. The City regulates short-term rentals through the *Short-term Rental Regulation Bylaw* and through provisions of the zoning bylaws. In relation to the property, the relevant zoning bylaw is the *Zoning Regulation Bylaw*, which states, in part:

17...

- (4) *Without limiting the generality of subsection (1), short-term rentals, whether as a principal or accessory use, are prohibited in all zones except*
- (a) *where they are expressly permitted subject to regulation applicable in those zones;*
 - (b) *rental of no more than two bedrooms in a self-contained dwelling unit, as home occupation, provided that:*
 - (i) *the self-contained dwelling unit is occupied by the operator of the short-term rental; and*
 - (ii) *short-term rental complies with all regulations in Schedule D as if it were a transient accommodation.*

41. The city regulates home based businesses, including principal resident short-term rentals, through *Schedule 'D' – Home Occupations*, which states, in part:

- (12) Subject to the following requirements, a short-term rental is permitted as a home occupation in a principal residence.
- (1) subject to subsection (2), no more than two bedrooms may be used for short-term rental and the short-term rental cannot occupy an entire self-contained dwelling unit.

42. The City of Victoria regulates the principal resident requirement for a short-term rental through the *Short-Term Rental Regulation Bylaw*, which states in part:

3...

- (1) A person must not carry on business as a short-term rental operator unless the person holds a valid licence issued under the provisions of this Bylaw and the Business Licence Bylaw.

(2) A person applying for the issuance or renewal of a licence to operate a short-term rental must, in addition to meeting the requirements of the Business Licence Bylaw:

(e) provide evidence, satisfactory to the Licence Inspector, that the premises where the short-term rental will be operated are the operator's principal residence.

V. Argument

43. One of the objectives of the City's regulations of short-term rentals was to address the problem of homes being diverted from the long-term market to a vacation rental market.
44. The City of Victoria regulations define short-term rentals as the renting of a dwelling unit, or any part of it, for a period of less than 30 nights. Therefore, the City considers any rental of 30 consecutive nights or more to be a long-term rental [Appendix A].
45. In order to be issued a short-term rental licence, applicants must provide proof satisfactory to the licence inspector that the premise where the short-term rental will occur is occupied by the operator as their principal residence. If the applicant satisfies the principal residence requirement, their business operation must comply with conditions of *Schedule D – Home Occupation* to be approved [Appendix A-B].
46. It can be challenging to determine if a property is a person's principal residence. The City does require proof of residence documents to process a principal resident short-term rental application. While the documents assist in establishing an applicant's eligibility, they are not solely relied upon to verify a person's principal residence because address changes can be done online without secondary checks. Many utility bills offer e-billing options, making mailing addresses redundant. Additionally, as of 2025, applications are now required to include home or rental insurance policies, which can assist in verifying property use but are still based on self-declaration. Many insurance companies allow homes occupied by a principal resident to operate varying levels of nightly rental activity while maintaining the designation of being occupied by a resident. However, if the operator changes the policy afterward or misrepresents the use of the property, the City will have no way of confirming this information. As a result, it cannot be considered complete proof of eligibility. These documents are used primarily to help staff identify potentially ineligible applications rather than to independently verify eligibility.
47. Short-term rental licences are applied for and reviewed annually because a person's eligibility is subject to change. The regulations explicitly state the onus is entirely on the applicant to provide evidence satisfactory to the Licence Inspector that the premise is their principal residence. The regulations are designed to allow the Licence Inspector to exercise discretion and professional judgment, particularly when there are unusual circumstances or valid concerns. In practice, however, public opinion often expects licences to be granted unless there is overwhelming evidence to deny the application. In many cases, applicants provide the minimum required documents and rely on personal

declarations to assert eligibility. When the Licence Inspector is not satisfied and denies the licence, they are often criticized despite the decision being fully supported by the regulations. Licence Inspectors do their best to assess each application fairly, accounting for individual circumstances, potential biases, and the good faith of applicants while still upholding the integrity of the regulations. However, in instances where there is an absence of evidence to corroborate or refute the Licence Inspector's concerns, the expectation appears to be to assume applicant's declarations are truthful and approve the licence [Appendix A].

48. The appellant claims the City is being unfair in the assessment. However, if anything the Licence Inspector has been consistently reasonable in providing the appellant with the benefit of the doubt. In the previous licensing years, it has been consistently challenging to determine whether the 402-960 Yates Street is used as the appellant's principal residence. The frequency of rental activity, along with inconsistencies in the appellant's declarations and business plan, aligned more closely with the property being used as a rental. In 2023, the appellant declared she would be relocating to Mexico and renting the property as her main source of income. The principal resident licence was initially denied in 2023, as the appellant very clearly intended to operate full time rentals. The appellant amended their application and was granted a licence based on their declarations regarding principal residency being truthful. However, their subsequent change to a non-principal resident licence type removed the City's requirement to regulate the frequency of their rental or principal residence status. The application review for the appellant's 2024 principal resident licence did raise some concerns, as the May 8, 2024, inspection revealed few personal items and appeared ready to receive accommodation. However, the appellant's business plan at the time was distinctly different from previous declarations made in 2023. The appellant described being away for no more than two weeks at a time, while visiting family or on vacation. Given the appellant's demonstrated understanding of the regulations and a business plan that reflected occasional use, it was concluded as reasonable to issue a 2024 principal resident short-term rental licence based on the information at the time. In 2025, the review of the appellant's principal resident short-term rental licence application again raised significant concerns. The appellant's statements that the property was intended to be rented as their source of income and to maximise short-term rentals which matched the insurance policy documents provided, confirming the property is used as a rental, not as the appellant's principal residence [Appendix A-M].
49. The information gathered on January 30, 2025, by the inspecting Bylaw Officer reflected that while the appellant may occupy the property at times for personal use, the primary use of the property is for rentals. Even accounting for the state of the unit on January 30, 2025, the appellant would not provide the Bylaw Officer with explicit verbal confirmation that 402-960 Yates Street is in fact their principal residence. However, the appellant did declare they would be living in Mexico and intended to operate rentals for the maximum nights allowed if issued a principal resident licence. It is critical to understand that the allowable number of rental nights is a restriction for licensed operators, but it is not sufficient to establish the applicant's eligibility to obtain a licence. To be issued a licence,

the applicant must provide evidence satisfactory to the Licence Inspector's that the premise is the operator's principal residence [Appendix M].

50. The appellant's insurance documents explicitly state the property's occupancy is 'rented to others- short-term'. The appellant asserts in their appeal that their insurance reflects this because it includes short-term rentals, and that the policy cannot be changed currently due to a claim. However, insurance documents reflect an occupancy designation that matches the property's actual use. The designation of renting to others also provides a plausible explanation to the appellant's statements on January 30, 2025, that they were moving from hotel to hotel while the unit is under construction due to flooding. The inspection clearly reflected the unit was not habitable, and usually, insurance companies are only required to cover alternative accommodations when the property is designated as a principal residence. It appears more than likely that the appellant's insurance policy is an accurate reflection of the property's use, which is a rental property [Appendix K].
51. The appellant's appeal outlines personal circumstances that they cite as the reasoning behind the rental activity. The Licence Inspector acknowledges and sympathizes with these individual challenges. Nonetheless, the appellant has consistently declared their intention to reside elsewhere and operate the property as a rental, specifically short-term. While the Licence Inspector recognizes that personal difficulties may impact decision making, individual circumstances do not provide a basis to grant a licence to operate outside the regulations.
52. The appellant's appeal relies mostly on supplementary documents showing 402-960 Yates Street listed as their home address. However, these documents are based entirely on self-declarations and do not prove the actual use of a property. It has been established that the appellant owns the property and may occupy it at times for personal use, but the frequency and consistency remain unverified and unsupported by reliable evidence. Granting a short-term rental licence based on minimal documentation and self-declarations of eligibility, would effectively allow anyone to qualify, at least for one property. This approach would undermine the purpose of the regulations, which are meant to preserve long-term housing and permit only occasional short-term rental use in dwellings that are otherwise occupied by individuals on a daily basis [Appendix A-B].
53. Moreover, even if the appellant claims that denying them a licence would not contribute to long-term housing supply, as the unit will not be sold or leased on an annual basis, it is important to remember that in the City of Victoria, long-term rentals are regulated as stays of 30 consecutive nights or more. Being ineligible for a principal residence short-term rental licence does not prevent an owner from renting their property. It simply means the property must be rented for 30 consecutive nights or longer. The short-term rental regulations are intended to protect long-term housing. While some applications involve more nuanced personal circumstances, the regulations are clear that the applicant must provide evidence satisfactory to the Licence Inspector that the property is their principal residence.

54. The regulation does not require the Licence Inspector to obtain an alternative residence or verification of the applicant's location in determining eligibility and compliance with the regulations. The Licence Inspector is solely responsible for determining if the applicant has met the requirements of the *Short-Term Rental Regulation Bylaw*. The appellant did not provide, in form satisfactory to the Licence Inspector, evidence that the 402-960 Yates Street is occupied by the appellant as their principal residence.
55. For all these reasons, the Licence Inspector submits that the appellant's application for a short-term rental business licence had to be refused as it contravened the *Short-Term Rental Bylaw, Schedule 'D' – Home Occupation and Zoning Regulation Bylaw*.
56. Therefore, the Licence Inspector submits that this appeal should be dismissed and the decision to refuse a short-term rental business licence for 402-960 Yates Street be upheld.

ALL OF WHICH IS RESPECTFULLY SUBMITTED

Dated: May 8, 2025

Mark Fay, Manager of Bylaw and Licensing
Services



SHORT-TERM RENTAL REGULATION BYLAW

BYLAW NO. 18-036

This consolidation is a copy of a bylaw consolidated under the authority of section 139 of the *Community Charter*.
(Consolidated on August 01, 2024 up to Bylaw No. 24-059)

This bylaw is printed under and by authority of the Corporate Administrator of the Corporation of the City of Victoria.

NO. 18-036

SHORT-TERM RENTAL REGULATION BYLAW
A BYLAW OF THE CITY OF VICTORIA

(Consolidated to include Bylaws No. 19-067, 24-059)

19-067

The purposes of this Bylaw are to provide for the regulation of short-term rentals including vacation rentals in operators' principal residences where permitted under the Zoning Regulation Bylaw No. 80-159 or Zoning Bylaw 2018 No. 18-072, and where permitted pursuant to section 528 of the *Local Government Act*.

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Pursuant to its statutory powers, including section 8(6) of the *Community Charter*, the Council of The Corporation of the City of Victoria, in an open meeting assembled, enacts the following provisions:

Title

- 1 This Bylaw may be cited as the "Short-Term Rental Regulation Bylaw".

Definitions

- 2 In this Bylaw

24-059	"dwelling unit" has the same meaning as in the <i>Zoning Regulation Bylaw</i> ;
24-059	"host" means the person who, either on their own behalf, or on behalf of the owner or occupier, arranges to offer premises for a short-term rental and includes anyone who manages advertising, booking, guest services, property maintenance, or other services related to short-term rental;
24-059	"operator" means a person who rents out, or offers for rent, any premises for short-term rental, and includes the owner, occupant, host, or manager of the premises offered as short-term rental, but does not include a platform service provider;

- 24-059 “platform service provider” has the same meaning as in the *Short-Term Rental Accommodations Act*;
- 24-059 “principal residence” means the residence in which an individual resides for a longer period of time in a calendar year than any other place;
- “responsible person” means a person designated by the operator as the primary contact under section 6.
- 24-059 “short-term rental” means the renting of a dwelling unit, or any part of it, for a period of less than 30 nights and includes strata hotels and vacation rentals but does not include time-shares when occupied by a time-share owner;
- “strata corporation”, “strata council”, and “strata lot” have the same meaning as in the *Strata Property Act*;
- 24-059 “strata hotel” has the same meaning as in the *Zoning Regulation Bylaw*.

Licence Required

- 3 (1) A person must not carry on business as a short-term rental operator unless the person holds a valid licence issued under the provisions of this Bylaw and the Business Licence Bylaw.
- (2) A person applying for the issuance or renewal of a licence to operate a short-term rental must, in addition to meeting the requirements of the Business Licence Bylaw:
- (a) make an application to the Licence Inspector on the form provided for that purpose;
 - (b) pay to the City the applicable licence fee prescribed under subsection (3);
 - (c) provide, in the form satisfactory to the Licence Inspector, evidence that:
 - (i) the person owns the premises where the short-term rental will be offered, or
 - (ii) the owner of the premises where the short-term rental will be offered has consented to their use as a short-term rental;
 - (d) if the premises where the short-term rental will be offered are located within a strata lot, provide a letter from the strata council confirming that provision of short-term rental does not contradict any bylaws of the strata corporation or applicable provisions of the *Strata Property Act*; and
- 24-059 (e) provide evidence, satisfactory to the Licence Inspector, that the premises where the short-term rental will be operated are the operator’s principal residence.
- 24-059 (3) The licence fee for purposes of subsection (2)(b) is \$150.

Power to Refuse a Licence

- 4 The Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector,
- (a) the applicant has failed to comply with section 3; or
 - (b) the short-term rental operation would contravene a City bylaw or another enactment.

Licence Number to be Included in Advertising

- 5 A person may offer to rent premises for rent as a short-term rental only if a valid business licence number is included in any advertising, listing, or promotion material that is intended to communicate availability of the premises for short-term rental.

Responsible Person

- 24-059 6 (1) A person may only operate a short-term rental if they ensure that the name and contact information of the responsible person is prominently displayed in the short-term rental premises at all times when the short-term rental is operated.
- 24-059 (2) The operator may be the responsible person except when subsection (4 5) applies.
- (3) The responsible person must be able to attend at the short-term rental premises within two hours of being requested to do so.
- (4) If a person who operates a short-term rental in their principal residence is going to be away during the term of the short-term rental, they must designate a responsible person and comply with this section.

Offences

- 24-059 7 (1) A person commits an offence and is subject to the penalties imposed by this Bylaw, Bylaw Notice Adjudication Bylaw, the Ticket Bylaw and the Offence Act if that person
- (a) contravenes a provision of this Bylaw;
 - (b) consents to, allows, or permits an act or thing to be done contrary to this Bylaw; or
 - (c) neglects or refrains from doing anything required by a provision of this Bylaw.
- (2) Each instance that a contravention of a provision of this Bylaw occurs and each day that a contravention continues shall constitute a separate offence.

Penalties

8 A person found guilty of an offence under this Bylaw is subject to a fine of not less than \$100.00 and not more than \$10,000.00 for every instance that an offence occurs or each day that it continues.

Severability

9 If any provision or part of this Bylaw is declared by any court or tribunal of competent jurisdiction to be illegal or inoperative, in whole or in part, or inoperative in particular circumstances, it shall be severed from the Bylaw and the balance of the Bylaw, or its application in any circumstances, shall not be affected and shall continue to be in full force and effect.

Transition Provisions

24-059 10 Repealed

Commencement

11 This bylaw comes into force on adoption.

READ A FIRST TIME the	22nd	day of	February	2018
READ A SECOND TIME the	22nd	day of	February	2018
READ A THIRD TIME the	22nd	day of	February	2018
ADOPTED on the	8th	day of	March	2018

“CHRIS COATES”
CITY CLERK

“LISA HELPS”
MAYOR

Schedule “D”
HOME OCCUPATIONS

	1	Where <u>home occupations</u> are permitted pursuant to the provisions of this bylaw, the following conditions shall apply to the use:
Location	2	For the purposes of a <u>home occupation</u> , the location of a business is the address at which the operations of the business are managed.
Exception	3	A <u>home occupation</u> is not required to be operated wholly within a <u>dwelling unit</u> where the work is undertaken entirely off the <u>lot</u> on which the <u>dwelling unit</u> is located.
Prohibition	4	The sale of goods to customers attending on the <u>lot</u> on which the <u>dwelling unit</u> is located is prohibited.
Permitted Uses	5	<p>The following uses are permitted as <u>home occupations</u>:</p> <ul style="list-style-type: none">(a) artist studio;(b) mail order, provided that no merchandise is sold to customers attending on the <u>lot</u> on which the <u>dwelling unit</u> is located;(c) making, processing and assembly of products on a small scale;(d) manufacturing agent;(e) personal and professional services, including barber, hairdresser, bookkeeper, medical therapy;(f) teaching, provided that attendance is limited to 5 persons in a detached dwelling and to 1 person in a <u>duplex</u> or <u>multiple dwelling</u>;(g) testing, servicing and repairing of goods.

Schedule "D"

Prohibited Uses	6	<p>(1) All uses that are noxious or offensive to any other dwelling units or the general public by reason of emitting odour, dust, smoke, gas, noise, effluent, radiation, broadcast interference, glare, humidity, heat, vibration, or hazard or any other emission are prohibited.</p> <p>(2) The following uses are prohibited:</p> <ul style="list-style-type: none"> (a) except as provided in Section 11, Bed and Breakfast; (b) car repairs and <u>garages</u>; (c) <u>clubs</u>; (d) kennels; (e) radio dispatch services; (f) <u>restaurants</u>; (g) retail stores; (h) salvage lots; (i) storage lots; (j) except as provided in Section 11, <u>transient accommodation</u>; (k) in any <u>building</u> which has been converted from <u>single family dwelling</u> to <u>duplex</u>, <u>multiple dwelling</u>, <u>boarding house</u>, <u>rooming house</u>, or <u>housekeeping apartment</u>, pursuant to the applicable provisions of this bylaw, music teaching or any business which results in the transmission of sound; (l) cannabis-related business; and; (m) except as provided in Section 12, <u>short-term rental</u>.
Stock in Trade	7	Except for one licensed vehicle, which shall be a car, van, or pickup truck, no business-related materials, including machinery or vehicles, shall be visible at any time on any <u>lot</u> on which a <u>home occupation</u> is carried out nor shall any machinery or vehicles be parked or stored on the <u>lot</u> unless completely enclosed within a <u>building</u> .
Limitation	8	<p>(1) Subject to this section, not more than one person shall be engaged in a <u>home occupation</u>, with the exception of urban agriculture, where up to two people are permitted to be engaged in the <u>home occupation</u>, and the person(s) shall reside on the <u>lot</u> on which the <u>home occupation</u> is carried on.</p> <p>(2) Where any <u>lot</u> upon which a <u>home occupation</u> is carried on has a boundary or portion of a boundary in common with any <u>lot</u> which is located in a zone which permits retail use, then no more than two persons may be engaged the <u>home occupation</u> where one of the persons resides on the <u>lot</u> on which the <u>home occupation</u> is carried on.</p>

Amended Jan 11, 2018
Bylaw 17-110

Amended March 8, 2018
Bylaw 18-035

Schedule "D"
HOME OCCUPATIONS

(3) This section does not apply to any employees of a home occupation who at no time attend on the lot on which the home occupation is carried on, nor park in the immediate vicinity of the lot.

(4) More than one person may operate a short-term rental in their principal residence.

Amended March 8, 2018
Bylaw 18-035

9 No more than three home occupations shall be carried on in any one dwelling unit, provided that only one of the home occupations has customers that attend the dwelling unit.

Amended Jan 11, 2018
Bylaw 17-110

Advertising

10 Except as expressly permitted in this bylaw, or in the Sign By-law, no sign or other advertising device or advertising matter may be exhibited or displayed on any lot on which a home occupation is being carried on.

11 Subject to the following requirements, where any building is used as a single family dwelling, up to two bedrooms may be used for transient accommodation as a home occupation.

(1) Notwithstanding Section 4, meals or food services may be provided to any customers but not after 12:00 noon.

(2) No liquor shall be provided to any customers.

(3) One parking space for each room available for transient accommodation shall be provided on the lot and a parking space may be located behind another parking space.

(4) No sign may be erected, used, or maintained for the purpose of advertising transient accommodation use within a single family dwelling.

(5) A single family dwelling may be used for transient accommodation whether or not the property contains a secondary suite or garden suite provided however that only one transient accommodation use is permitted on the property

Amended March 8, 2018
Bylaw 18-035

(6) Transient accommodation is restricted to no more than two bedrooms and cannot occupy an entire self-contained dwelling unit.

Amended March 8, 2018
Bylaw 18-035

12 Subject to the following requirements, a short-term rental is permitted as a home occupation in a principal residence.

Amended March 8, 2018
Bylaw 18-035

(1) subject to subsection (2), no more than two bedrooms may be used for short-term rental and the short-term rental cannot occupy an entire self-contained dwelling unit;

Schedule “D”

- (2) the entire principal residence may be used for a short-term rental while the operator is temporarily away provided it is so used no more than 160 nights in a calendar year; and
- (3) no liquor may be provided to short-term rental guest; and
- (4) No sign may be erected, used, or maintained for the purpose of advertising short-term rental.

Amended August 1, 2024
Bylaw 24-060

Amending Bylaw 09-01 adopted Jan 19, 2009
Amending Bylaw 17-110 adopted Jan 11, 2018
Amending Bylaw 18-035 adopted March 8, 2018
Amending Bylaw 24-060 adopted August 1, 2024

Appendix C

BYLAW OFFICER STATEMENT

Officer Rank/Number/Rank	BO Robert HALKETT VBLS 1012
Date	Wednesday, June 21, 2023
Time	10:00 AM
Subject	R/O: Tanya DODD
Location	402-960 Yates Street
File	#232785

Bylaw Officer (BO) HALKETT attended 402-960 Yates Street, in Victoria BC at 10:00 AM on Wednesday, June 21, 2023 to conduct a short-term rental (STR) inspection. Upon arrival, HALKETT called DODD on the exterior intercom system and identified himself as the Victoria Bylaw Officer there to conduct the inspection. DODD 'buzzed' HALKETT into the building and he met her at the entrance to unit #402. Upon arrival, he introduced himself again and put on boot coverings before entering the unit.

Once inside, HALKETT asked DODD about the layout of the unit and her potential plans for renting it as a means of income. She stated that it was a two-bedroom condo, and she would not be renting it while she is home but more so two weeks out of every month or so. She explained that she was diagnosed with an auto-immune disorder and is no longer able to work. She elaborated by stating that she would go stay at her dad's home in Mexico during the time she rents out her unit as a source of income while she is off work. She added that some cupboards in the kitchen would be locked as she would keep her food and utensils in those while offering other cupboards and drawers to guests. HALKETT then explained that he would have to photograph all areas of the unit that guest would have access to. DODD was compliant and let HALKETT photograph all areas with no complaints. The layout of the unit consisted of a bathroom, one guest bedroom, one master bedroom with an ensuite bathroom, full kitchen, living room and a large patio with chairs and a hot tub. Once HALKETT finished photographing all areas of the unit, he asked DODD if she had any questions regarding the application process. She had no further questions, but HALKETT provided her with a business card and asked her to call or email him if any questions or concerns came up. HALKETT thanked her for her time and departed the area.

REQUEST FOR SERVICE DETAIL

Workgroup	BYLAW SERVICES		Class	SHORT TERM RENTAL	
Call	232785	Jun 8, 2023 9:08 AM	Problem	NOT COMPLY WITH REGULATIONS	
Status	COMPLETED	Mar 18, 2024 1:18 PM	Priority	NORMAL	Reference APPROVED 20
Follow up	NO	Internal NO	Bring Forward	Repeat	

Location	Requestor
MIRIAM/ TANYA DODD 1039125	STR CLERK
402 960 YATES ST VICTORIA BC V8V 3M3	

Call Detail

HOST: COHOSTS: RO: Tanya DODD

<https://www.airbnb.ca/rooms/955191859923922765?>

Workflow	Date	Name1	Name2	File No
ENTERED	Jun 8, 2023 9:08 AM	EMMA CROCKETT		
ASSIGNED	Jun 8, 2023 9:09 AM	EMMA CROCKETT		
	2023 STR PRINCIPAL APPLICATION RECEIVED			
NOTE	Jun 19, 2023 1:23 PM	CELINE KOBENTER		
	INSPECTION REQUIRED			
ASSIGNED	Jun 19, 2023 2:32 PM	ROBERT HALKETT		
	PLEASE CONTACT FOR INSPECTION: Availability on Wednesday, June 21 2023			
EMAIL	Jun 19, 2023 2:33 PM	-		
	SHORT TERM RENTAL Call number: 232785 402 960 YATES ST			
NOTE	Jun 21, 2023 7:05 AM	ROBERT HALKETT		
	SNIPS ATTACHED - ZONING/AERIAL/LICENSING/OWNER INFO			
	Owner: Tanya DODD BL00044814: Pending			

Appendix D

NOTE Jun 21, 2023 10:22 AM ROBERT HALKETT
BYLAW ATTENDANCE - INSPECTION CONDUCTED
2023-06-21 10:00 AM

At the above date and time, BO HALKETT attended 402-960 Yates Street to conduct a formal Short-Term Rental Inspection. The purpose of the inspection was to understand the floor plan and business plan for the potential rental unit. HALKETT met with the unit occupant and owner, Tanya DODD.

See attachments including a statement, photos and layout drawing for further details.

NOTE Jun 21, 2023 11:37 AM ROBERT HALKETT
PHOTOS ATTACHED

NOTE Jun 21, 2023 1:54 PM ROBERT HALKETT
STATEMENT ATTACHED

NOTE Jun 21, 2023 2:26 PM ROBERT HALKETT
LAYOUT DRAWING ATTACHED

NOTE Jun 21, 2023 3:29 PM ROBERT HALKETT
RECOMMENDATION **DENIAL**

HALKETT recommends that this application be denied.

Given DODD's business plan of wanting to potentially rent out her condo "every couple weeks", HALKETT does not believe that would fit the licence of 'Principle Residence'. As this building is considered to be legal non-conforming, DODD could potentially apply for a non-principal residence licence.

I recommend that she be notified of this if a denial letter is to mailed to her.

DENIAL

ASSIGNED Jun 21, 2023 3:39 PM STR COORDINATOR
REASSIGNED FOR REVIEW - *DENIAL*

EMAIL Jun 21, 2023 3:40 PM <strcoordinator@victoria.ca>
SHORT TERM RENTAL Call number: 232785 402 960 YATES ST

NOTE Jun 22, 2023 4:01 PM MARISSA PELUSO
DENIED - PRINCIPAL RESIDENCE APPLICATION

See attached

NOTE Jun 27, 2023 3:43 PM CELINE KOBENTER
PHONE CALL - KOBENTER TO RO (1/2):
RO left 2 VMs regarding the denial of her 2023 Principal Resident Operator application. KOBENTER returned the call at 3:30 on June 27th. Dodd expressed frustration about the denial and stated that she did not understand it, as she is the type of operator we should want instead of non-principal condos, and that is all a cash grab. KOBENTER explained that the business plan provided during the inspection did not qualify for PRO licence type but DODD is eligible to apply for NPRO to support the volume of bookings she suggested she was interested in. KOBENTER offered that DODD submit a new business plan in writing as she later stated she only intended on having 4 bookings possibly starting as late as September 2023. DODD said she would consider it. DODD added she is only required to be home once a month for her treatments but loves her home and expects to be home more.

Appendix D

NOTE Jun 27, 2023 3:53 PM CELINE KOBENTER

PHONE CALL - KOBENTER TO RO (2/2):

DODD expressed additional frustration regarding the fact that 4 bookings/year is not stated online, in the Bylaw or on the forms. She did acknowledge that she was aware KOBENTER and Miriam BYRNE (her property manager) had discussed this a few weeks prior.

NOTE Jun 27, 2023 3:54 PM CELINE KOBENTER

VOICEMAILS - RO TO STR:
2 VOICEMAILS ATTACHED

NOTE Jun 30, 2023 9:38 AM CELINE KOBENTER

EMAIL - KOBENTER TO DODD:

Requesting more specifics with regards to the Principal resident operator business plan. See attached email.

NOTE Jun 30, 2023 11:10 AM CELINE KOBENTER

NEW BUSINESS PLAN SUPPLIED

NOTE Aug 16, 2023 8:04 AM MARISSA PELUSO

LISTING IDENTIFIED

August 16, 2023, PELUSO identified listing offering 2 night stay. The owner has a principal resident licence. Most of the calendar is available up to May 2024.

NOTE Aug 21, 2023 3:44 PM CELINE KOBENTER

AIRBNB LISTING CALENDAR CHANGES:

See attached snip of calendar, showing additional dates blocked off

NOTE Sep 11, 2023 9:03 AM CELINE KOBENTER

EMAIL - DODD TO STR:

Lincence type switch request to accommodate 4+ bookings per year.

KOBENTER has begun the licence type switch. see attached email

ASSIGNED Sep 13, 2023 10:46 AM EMMA CROCKETT

ASSIGNED TO MONITOR:

- FOR PAYMENT

- FOR UPDATED LS NUMBER ON LISTING

Please reassign to STR COORDINATOR with a BF of january 4th 2024 once compliant

NOTE Sep 13, 2023 10:46 AM CELINE KOBENTER

2023 NON-PRINCIPAL LICENCE APPROVED & INVOICED

NOTE Sep 14, 2023 8:07 AM EMMA CROCKETT

2023 STR LICENCE PAID

NOTE Sep 14, 2023 8:08 AM EMMA CROCKETT

EMAIL STR TO RO:

request to add bl# in ad

ASSIGNED Sep 19, 2023 9:32 AM STR COORDINATOR

ASSIGNED FOR 2024 MONITORING:

Confirmed BL# in listing

EMAIL Sep 19, 2023 9:32 AM <strcoordinator@victoria.ca>

SHORT TERM RENTAL Call number: 232785 402 960 YATES ST

Appendix D

ASSIGNED Dec 28, 2023 11:00 AM EMMA CROCKETT
2024 STR PRINCIPAL APPLICATION RECEIVED

NOTE Dec 28, 2023 2:17 PM EMMA CROCKETT
EMAIL STR TO RO:
inspection scheduling

NOTE Jan 3, 2024 7:50 AM EMMA CROCKETT
LICENCE TYPE CHANGED TO NON PRINCIPAL

NOTE Jan 8, 2024 12:05 PM MARISSA PELUSO
2024 LICENCE APPROVED AND NOTIFIED

COMPLETED Mar 18, 2024 1:18 PM EMMA CROCKETT
CLOSED HISTORICAL CFS , LINKED TO LICENCING CFS 258475



Bylaw Services

1 Centennial Square, Victoria, BC V8W 1P6
bylawservices@victoria.ca | 250.361.0215

June 22, 2023

DODD, TANYA L
402-960 YATES ST
VICTORIA BC V8V 3M3

Re: 402-960 Yates St

The City has completed a review of your short-term rental licence application for the property located at 402-960 Yates St.

After reviewing the application and results of the inspection on June 21, your 2023 application has been denied. The application has failed to meet the eligibility criteria for a Principal Residence Short-Term Rental licence. For more information on the *SHORT-TERM RENTAL REGULATION BYLAW*, please visit: [18-036 STR Regulation Bylaw.pdf \(victoria.ca\)](#)

If you wish to apply for a Non-Principal Residence Short-Term Rental licence, please submit a new application to str@victoria.ca. Our office will honour the previously provided strata and owner consent if authorization signatures were obtained in the last 60 days.

Our office will provide you until **July 6th, 2023** to cease offering and operating a short-term rental at 402-960 Yates St. Please be aware that operating a short-term rental in contravention of City bylaws is subject to a fine of not less than \$100.00 and not more than \$10,000.00 for every instance that an offence occurs or each day that it continues.

Finally, if you believe there was a mistake in the assessment of your application, please reach out to our office for clarification. You may appeal the decision to deny your short-term rental licence to City Council by submitting a written request to appeal within 30 days of the date of this letter. More information on the appeal process, and the short-term rental regulation program can be found at [Short-Term Rentals | Victoria](#). Please note that you are not permitted to operate during the appeal process.

If you have any questions regarding the results of the application, alternate options, or more, please contact our office by phone at 250.361.0726, or by email at str@victoria.ca.

Regards,

Marissa Peluso
Bylaw & Licensing Services
Legislative & Regulatory Services Department
City of Victoria
1 Centennial Square, Victoria B.C. V8W 1P6

Appendix F

Marissa Peluso

From: str@victoria.ca
Sent: May 6, 2025 2:16 PM
To: str@victoria.ca
Subject: Fw: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

From: Tanya Dodd
Sent: Monday, September 11, 2023 4:08 PM
To: str@victoria.ca <str@victoria.ca>
Subject: Re: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Thanks so much Celine!

Get [Outlook for iOS](#)

From: str@victoria.ca <str@victoria.ca>
Sent: Monday, September 11, 2023 9:06:15 AM
To: Tanya Dodd <
Subject: RE: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Hi Tanya,

Thank you for your email. I have switched over your application. It will need to be re-approved by Zoning. Once this is complete, you will receive another approval email, with a link to pay the difference of the balance between the Non-Principal licence fee and the Principal fee.

Please note: you will also be issued a new business licence number. When paying your invoice, please make sure to grab that new number to update your listing(s).

Thank you,

Celine Kobenter
Pronouns: she, her, hers
Short-Term Rental Coordinator, Bylaw and Licensing Services
Legislative and Regulatory Services Department
City of Victoria
1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

Appendix F

From: Tanya Dodd
Sent: Saturday, September 9, 2023 8:39 AM
To: str@victoria.ca
Subject: Re: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Good morning Celine,

It turns out my short term rental is going quite well and I would like to change my license from the license that only allows 4 stays per year to the unlimited license. Please confirm what is required to do so.

Thanks,

Tanya Dodd

From: str@victoria.ca <str@victoria.ca>
Sent: Friday, June 30, 2023 10:43:25 AM
To: Tanya Dodd
Subject: RE: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Hi Tanya,

Thank you very much for your response.

Your feedback will also be brought to my manager's attention.

Thank you,

Celine Kobenter

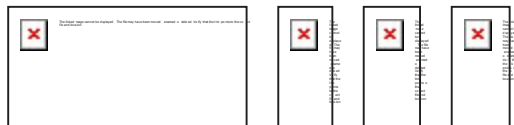
Pronouns: she, her, hers

Short-Term Rental Coordinator, Bylaw and Licensing Services

Legislative and Regulatory Services Department

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

From: Tanya Dodd
Sent: Friday, June 30, 2023 10:27 AM
To: str@victoria.ca
Subject: Re: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Hi Celine,

At this point, my plan is to offer one stay in August, one stay in October and 2 stays in November preferably for min of 7 days each.

The actual dates and length of stay could change based on when the condo will be ready to rent and my health.

However, if I end up choosing to rent for more than 4 stays in 2023, I will apply for a new licence.

Appendix F

It has always been my intention to follow the regulations for these licences. However, due to the lack of definitions provided initially and in the city's online resources for "occasional rentals while on vacation", I was unaware of these restrictions. In fact, this was not even made clear in the letter denying my application. Clear and transparent communication would allow applicants to choose the correct licence for their circumstances.

Thank you for your reconsideration.

Kind Regards,

Tanya

From: str@victoria.ca <str@victoria.ca>

Sent: Friday, June 30, 2023 9:37:28 AM

To: Tanya Dodd

Subject: RE: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Hi Tanya,

Thank you for your email. Per our phone conversation, our office is reviewing your proposed business plan, to ensure compliance with the Short-Term Rental Regulation Bylaw, the Zoning Regulation Bylaw, and the Business Licence Bylaw.

A principal resident short-term rental operator may:

- Offer up to two spare rooms in your unit, while you are home and sharing the space; and/or
- Offer your entire unit, on occasion, while temporarily away (4 STR bookings/year).

Principal Resident Operator applications are subject to additional review checks, including but not limited to:

- An inspection of the premises,
- Supplying a business plan, outlining which of the above offering will be occurring at the property,
- Supplemental ID and proof of address.

To approve your Principal Residence Licence application, our office needs to understand how and when you plan to operate your business in compliance with City of Victoria Bylaws. Your email provides us with confirmation that your only business plan is to offer the whole unit on occasion, while temporarily away.

During our phone call, you mentioned that you would likely not have the unit available for rent before September. Please confirm the weeks you plan to operate your business, with the understanding that the Principal Residence licence type only allows for 4 bookings.

For example:

- a. Offering minimum stay of 7 nights in the four weeks of September
- b. Offering in stay of 5 nights for last two weeks of September and last week of October.

Once we've received your written confirmation of when you will be offering the whole home, our office will be able to re-review the entire application.

The sooner you can provide this information, the sooner we can reconsider the application. As it is a long weekend, our office will be closed until Tuesday, July 4th 2023. If you have any further questions, please do not hesitate to respond to this email.

Thank you,

Appendix F

Celine Kobenter

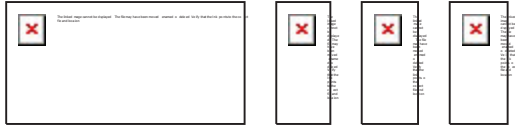
Pronouns: she, her, hers

Short-Term Rental Coordinator, Bylaw and Licensing Services

Legislative and Regulatory Services Department

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

From: Tanya Dodd

Sent: Tuesday, June 27, 2023 4:38 PM

To: str@victoria.ca

Subject: Principal Residence Short-Term Rental licence application for 402-960 Yates Street

Hi Celine,

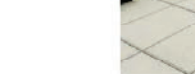
As discussed earlier, please reconsider my application for this licence. Due to my health and other factors, my plans are very up in the air and it is unlikely I will have more than 4 stays in the remainder of 2023. If this changes and I am able to accommodate more than 4 stays, I will submit an application for the non principal residence licence.

Please let me know if you require anything further.


Thanks,

Tanya Dodd


Appendix G




Entire condo hosted by Miriam
6 guests · 2 bedrooms · 2 beds · 2 baths




Add dates for prices



Self check-in
Check yourself in with the keypad.



Miriam is a Superhost
Superhosts are experienced, highly rated Hosts who are committed to providing great stays for their guests.



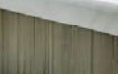
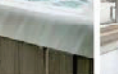
Furry friends welcome
Bring your pets along for the stay.

Ultra luxurious home with 1000 + sq. ft Terrace, Private Hot Tub & more

The space
Our newest addition! Enjoy our beautiful super luxurious culte Legato featuring a 1000 +sq ft. private outdoor terrace with hot tub, the beautifully designed layout with 2 Bedrooms, 2 Bathrooms, & more

[Show more >](#)

Where you'll sleep

Entire condo hosted by Miriam

6 guests · 2 bedrooms · 2 beds · 2 baths

Self check-in
Check yourself in with the keypad.

Miriam is a Superhost
Superhosts are experienced, highly rated Hosts who are committed to guests.

Furry friends welcome
Bring your pets along for the stay.

Ultra luxurious home with 1000 + sq. ft Terrace, Private Hot Tub & more

The space

Our newest addition! Enjoy our beautiful super luxurious suite in Legato featuring a 1000 +sq ft. private outdoor terrace with hot tub, the beautifully designed layout with 2 Bedrooms, 2 Bathrooms, & more

[Show more](#)

Where you'll sleep

1000+ sq. ft. Terrace

Private Hot Tub

1000+ sq. ft. Terrace

Private Hot Tub

1000+ sq. ft. Terrace

Private Hot Tub

1000+ sq. ft. Terrace

Private Hot Tub

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1000+ sq. ft. Terrace

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1000+ sq. ft. Terrace

Private Hot Tub

1000+ sq. ft. Terrace

Private Hot Tub


1000+ sq. ft. Terrace

Private Hot Tub

Appendix G

https://www.airbnb.ca/rooms/955191859239227657?adults=1&enable_m3_private_room=true&source_impression_id=p3_1692197415_TZ4iIfIL2bypxqs&previous_page_section_name=1000&feder...

Schedule (Sharepoi... STR INSPECTION T... STR Naming Conve... CORP SEARCH STR Tracking Sheet... BC Assessment - In... CRD Regional Map Internal Plan Search... Short-Term Rentals... HiChee | Check and... Schedule D.pdf STR DATABASE



Entire condo hosted by Miriam
6 guests · 2 bedrooms · 2 beds · 2 baths

Self check-in
Check yourself in with the keypad.

Miriam is a Superhost
Superhosts are experienced, highly rated Hosts who are committed to providing exceptional stays for their guests.

Furry friends welcome
Bring your pets along for the stay.

Ultra luxurious home with 1000 + sq. ft. Terrace, Private Hot Tub

The space
Our newest addition! Enjoy our beautiful super luxurious suite is Legato featuring a 1000 +sq ft. private outdoor terrace with hot the beautifully designed layout with 2 Bedrooms, 2 Bathrooms, p

[Show more >](#)

Add dates for prices

Select dates
Minimum stay: 2 nights

December 2023

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

January 2024

Su	Mo	Tu	We	Th	Fr	Sa
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

[Clear dates](#) [Close](#)


Where you'll sleep

Type here to search

16°C Sunny 7:53 AM 2023-09-16

https://www.airbnb.ca/rooms/955191859239227657?adults=1&enable_m3_private_room=true&source_impression_id=p3_1692197415_TZ4iIfIL2bypxqs&previous_page_section_name=1000&feder...

Schedule (Sharepoi... STR INSPECTION T... STR Naming Conve... CORP SEARCH STR Tracking Sheet... BC Assessment - In... CRD Regional Map Internal Plan Search... Short-Term Rentals... HiChee | Check and... Schedule D.pdf STR DATABASE



Entire condo hosted by Miriam
6 guests · 2 bedrooms · 2 beds · 2 baths

Self check-in
Check yourself in with the keypad.

Miriam is a Superhost
Superhosts are experienced, highly rated Hosts who are committed to providing exceptional stays for their guests.

Furry friends welcome
Bring your pets along for the stay.

Ultra luxurious home with 1000 + sq. ft. Terrace, Private Hot Tub

The space
Our newest addition! Enjoy our beautiful super luxurious suite is Legato featuring a 1000 +sq ft. private outdoor terrace with hot the beautifully designed layout with 2 Bedrooms, 2 Bathrooms, p

[Show more >](#)

Add dates for prices

Select dates
Minimum stay: 2 nights

February 2024

Su	Mo	Tu	We	Th	Fr	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

March 2024

Su	Mo	Tu	We	Th	Fr	Sa

[Clear dates](#) [Close](#)

Where you'll sleep

Type here to search

16°C Sunny 7:54 AM 2023-09-16

Appendix G

[Schedule](#) ([Sharepoint](#))... [STR INSPECTION T...](#) [STR Naming Conve...](#) [CORP SEARCH](#) [STR Tracking Sheet...](#) [BC Assessment - In...](#) [CRD Regional Map](#) [Internal Plan Search...](#) [Short-Term Rentals...](#) [HiChee | Check and...](#) [Schedule D.pdf](#) [STR DATABASE](#)

Entire condo hosted by Miriam
6 guests · 2 bedrooms · 2 beds · 2 baths

- Self check-in**
Check yourself in with the keypad.
- Miriam is a Superhost**
Superhosts are experienced, highly rated Hosts who are committed to providing excellent stays.
- Furry friends welcome**
Bring your pets along for the stay.

Ultra luxurious home with 1000 + sq. ft Terrace, Private Hot Tub & more!

The space
Our newest addition! Enjoy our beautiful super luxurious suite in Legato featuring a 1000 +sq ft. private outdoor terrace with hot tub, the beautifully designed layout with 2 Bedrooms, 2 Bathrooms, p...

[show more >](#)

Where you'll sleep

Add dates for prices

Select dates
Minimum stay: 2 nights

CHECK-IN
ADD DATE

CHECKOUT
ADD DATE

April 2024							May 2024						
Su	Mo	Tu	We	Th	Fr	Sa	Su	Mo	Tu	We	Th	Fr	Sa
		1	2	3	4	5				1	2	3	4
7	8	9	10	11	12	13	5	6	7	8	9	10	11
14	15	16	17	18	19	20	12	13	14	15	16	17	18
21	22	23	24	25	26	27	19	20	21	22	23	24	25
28	29	30					26	27	28	29	30	31	

[Clear dates](#) [Close](#)

Appendix H

Marissa Peluso

From: Tanya Dodd
Sent: December 30, 2023 8:33 AM
To: str@victoria.ca
Subject: Re: 2024 INSPECTION - 402 960 YATES

Hi Emma,
As discussed yesterday, I would like to change this application to a legal non conforming str business license application. Please let me know if you need anything else.
Thanks,
Tanya

From: str@victoria.ca <str@victoria.ca>
Sent: Thursday, December 28, 2023 2:17:01 PM
To:
Subject: 2024 INSPECTION - 402 960 YATES

Good Afternoon

Hope this email finds you well. The next step in your 2024 application process is scheduling an inspection. Bylaw Officer CARR is available:

MONDAY JANUARY 22ND @ 1PM
Or
SATURDAY JANUARY 27TH @ 1PM

If these options do not work with your schedule, please let me know at your earliest convenience and I will look at future dates.

I have attached a few helpful documents for your review.

Please note, as stated in the attached document "What You Need to Know" if the Inspecting Officer determines that there is a valid reason to inspect an area, you will be asked to grant access. Unless it is unreasonable to inspect those areas at that time, you are required to provide access.

Kind regards,

Emma Crockett

Pronouns: she, her, hers
Short-Term Rental Administrator, Bylaw and Licensing Services
Legislative and Regulatory Services Department
City of Victoria
1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

Appendix I

Marissa Peluso

From: Tanya Dodd
Sent: March 27, 2024 9:02 AM
To: str@victoria.ca
Subject: Re: 2024 STR INSPECTION - 402 960 YATES ST

Yes, that works for me.
Thanks,
Tanya

On Wed, Mar 27, 2024 at 9:02 AM str@victoria.ca <str@victoria.ca> wrote:

Good morning Tanya

Would May 8th at 1pm work for your schedule?

Kind regards,

Emma Crockett

Pronouns: she, her, hers

Short-Term Rental Administrator, Bylaw and Licensing Services

Legislative and Regulatory Services Department

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



Appendix I

The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

From: Tanya Dodd
Sent: Friday, March 22, 2024 1:15 PM
To: str@victoria.ca
Subject: Re: 2024 STR INSPECTION - 402 [960 YATES ST](#)

Hi Emma,

Unfortunately neither of those dates work for me. I can be available May 8 or any date after that.

Thanks,

Tanya

On Fri, Mar 22, 2024 at 1:12 PM str@victoria.ca <str@victoria.ca> wrote:

Good afternoon Tanya,

An inspection is required for all 2024 principal operator licence regardless of when the last time an inspection was completed.

Office Carr has availability on with

Wednesday April 24th at 1pm

Or

Thursday May 2nd at 930am

If neither of these appointments work for your schedule, please provide a few dates and general times you would be available.

Appendix I

Kind regards,

Emma Crockett

Pronouns: she, her, hers

Short-Term Rental Administrator, Bylaw and Licensing Services

Legislative and Regulatory Services Department

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

From: Tanya Dodd

Sent: Wednesday, March 20, 2024 1:23 PM

To: str@victoria.ca

Subject: Re: 2024 STR INSPECTION - 402 [960 YATES ST](#)

Hi Emma.

Thank for getting back to me. Unfortunately, my place is booked both of those dates so hopefully there is an alternative. In an effort to save your bylaw officer some time, the unit was already inspected last summer, less than a year ago. So perhaps we can refer to his notes then. My primary residence license was rejected at that time as I was unaware of the 4 stay limitation. However, I am now aware of this and will not exceed that after the May 1 switch to this license.

Please let me know.

Appendix I

Thanks,

Tanya

On Wed, Mar 20, 2024 at 1:19 PM str@victoria.ca <str@victoria.ca> wrote:

Good Afternoon ,

Hope this email finds you well. The next step in your 2024 application process is scheduling an inspection. Bylaw Officer CARR is available:

THURSDAY APRIL 25TH AT 930 AM

Or

FIRDAY APRIL 26TH AT 930 AM

If these options do not work with your schedule, please let me know at your earliest convenience and I will look at future dates. Please note the applicant must attend the inspection.

I have attached a few helpful documents for your review.

Please note, as stated in the attached document “What You Need to Know” if the Inspecting Officer determines that there is a valid reason to inspect an area, you will be asked to grant access. Unless it is unreasonable to inspect those areas at that time, you are required to provide access.

Kind regards,

Emma Crockett

Pronouns: she, her, hers

Short-Term Rental Administrator, Bylaw and Licensing Services

Legislative and Regulatory Services Department

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees and Esquimalt People.

Marissa Peluso

From: Tanya Dodd
Sent: February 20, 2024 4:09 PM
To: str@victoria.ca
Subject: Fwd: 2023 STR Licence Application for 402-960 Yates
Attachments: Tanya Dodd application.PDF; T Dodd BCDL.jpg; T Dodd Services Pg 1.jpg; T Dodd Services Pg 2.jpg; 000010513158-117014502135.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Please find attached an application for a primary residence str business license. I current have a non-confirming license but would like to apply for the primary residence license in anticipation of the rule changes coming on May 1. I will operate as non-conforming until May 1.

Please advise if you require anything further.

Thanks,

Tanya Dodd

Get [Outlook for iOS](#)

From: Tanya Dodd
Sent: Wednesday, December 27, 2023 7:08:33 PM
To: str@victoria.ca <str@victoria.ca>
Subject: Fwd: 2023 STR Licence Application for 402-960 Yates

Get [Outlook for iOS](#)

From: Tanya Dodd
Sent: Friday, December 15, 2023 5:33:37 PM
To: str@victoria.ca <str@victoria.ca>
Subject: 2023 STR Licence Application for 402-960 Yates

Appendix J

BYLAW OFFICER STATEMENT

Officer Rank/Number/Rank	BO Michael PICKETT VBLS 1014
Date	Wednesday, May 8, 2024
Time	1:30pm
Subject	Miriam DODD
Location	402-960 Yates Street
File	258817

BO PICKETT attended 402-960 Yates Street on Wednesday, May 8, 2024, at 1:30pm to conduct an inspection of a residence seeking a 2024 short-term rental licence. PICKETT buzzed the intercom at the front door to the building and was let in by the owner of the suite. PICKETT was greeted by a female who identified herself as Tanya DODD. PICKETT introduced himself and identified themselves as a Bylaw Officer for the City of Victoria. PICKETT was in full uniform.

PICKETT provided DODD with copies of the Schedule D, Bylaw Inspections-What You Need To Know and the Operating a Short-Term Rental in Victoria leaflets. PICKETT informed DODD that he would be required to inspect the suite by documenting through photographs and notes. PICKETT told DODD that following the inspection we can take time to discuss any questions either party may have. DODD stayed in the dining area and allowed PICKETT room to complete the inspection.

PICKETT began by photographing the interior of the suite. Upon entrance to the suite there is a small foyer. To the right of the entrance is a closet that contains a stacking washer/dryer combo and a door to a full bathroom (sink, toilet, Bathtub). To the left of the entrance is a hall closet and just beyond that, a door leading to Bedroom 1. Directly in front of the entrance is an open concept area that includes a full kitchen (refrigerator, stove, microwave, dishwasher) with a small dining area to the left and a living room at the far end. Off the living room on the right side of the suite is a door to Bedroom 2. Bedroom 2 has an ensuite washroom (sink, toilet, shower) and 2 large closets on either side of the entrance to the washroom. The closets are full of clothing and personal items.

DODD's mother and her dog BELLA were present in the suite and PICKETT observed dog bowls, treats, leash and toys.

Once PICKETT completed documenting the living space, he returned to the kitchen area and spoke with DODD regarding her business plan. DODD told PICKETT that she does not have a set time to be away and that it is sporadic due to medical appointments as she is off work on disability. When she does go away it is to visit family or vacation and plans are always subject to change. DODD rents out the entire suite while away except for 2 sheds on the patio and a closet that all lock. Guests gain access to the building remotely through the intercom by the property management company she uses and a code for the keypad lock on the suite entrance. DODD says her place is only advertised on Aibnb and Vrbo and is looking at offering 7-night minimum stay as she is limited to 4 nights in a year. DODD says she has written and left messages for the city multiple times about the limitation of 4 times in a year and has received no responses. DODD says she has put her name down to talk at a council meeting at the end of June on the matter. Her concern is that the new regulations were put in to create long-term housing, yet her place will never be long-term housing as it's her permanent residence and limiting her ability to rent

Appendix J

only 4 times in a year makes very little sense or difference when it comes to increasing housing numbers. The Designated Responsible Person available while DODD is away is Co-Host Property Management Company.

PICKETT exited the suite and took photos of the exterior of the dwelling and left the property at 2:05pm.

Appendix J

SHORT TERM RENTAL INSPECTION PHOTO PACKAGE

402-960 Yates Street

May 8, 2024



Photograph_402-960Yates_STRInspection_Exterior_Pickett_20240508



Photograph_402-960Yates_STRInspection_Exterior_BuildingEntrance_Pickett_20240508



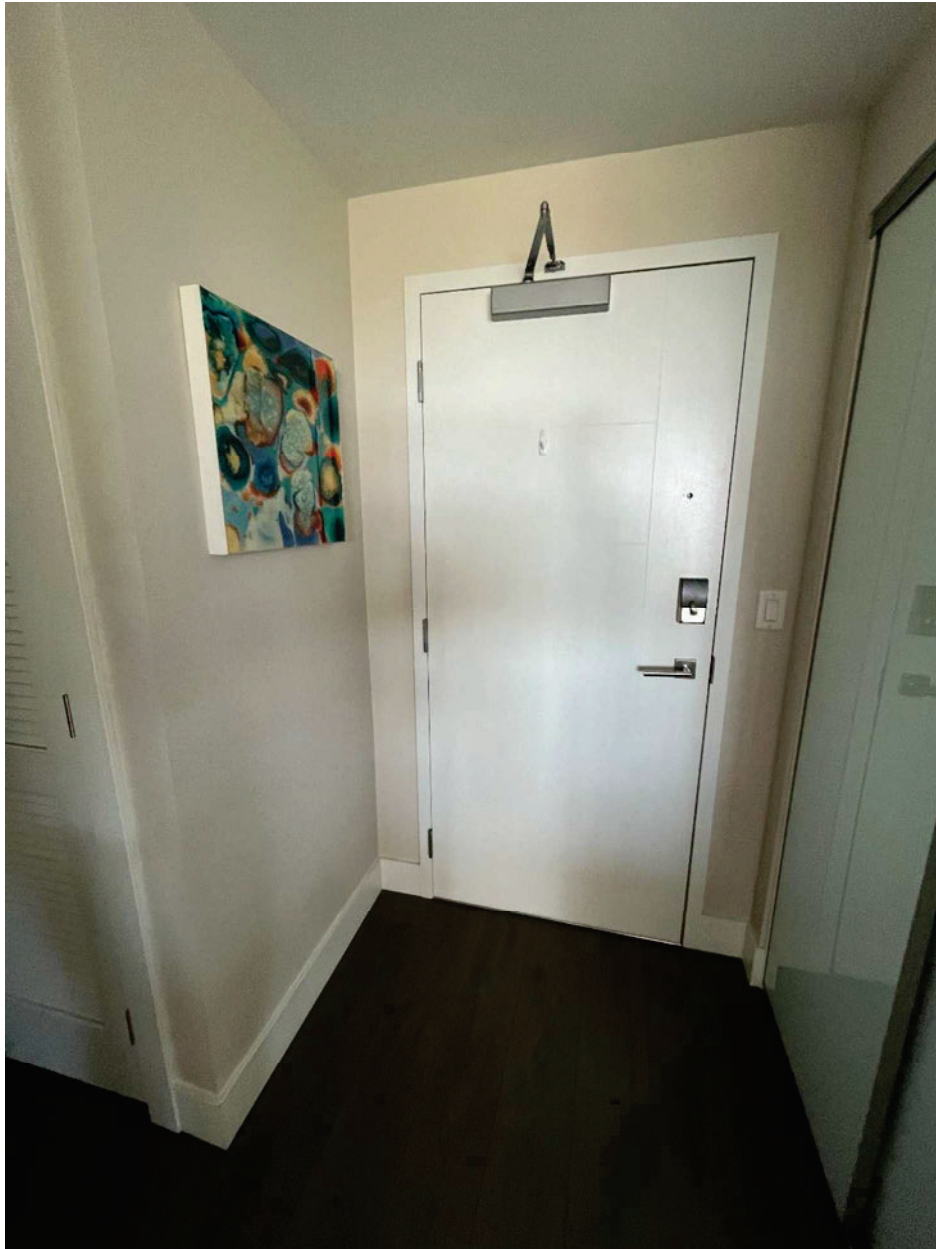
Photograph_402-960Yates_STRInspection_Exterior_Intercom_Pickett_20240508



Photograph_402-960Yates_STRInspection_Interior_SuiteEntrance_Pickett_20240508



Photograph_402-960Yates_STRInspection_Interior_Keypad_Pickett_20240508

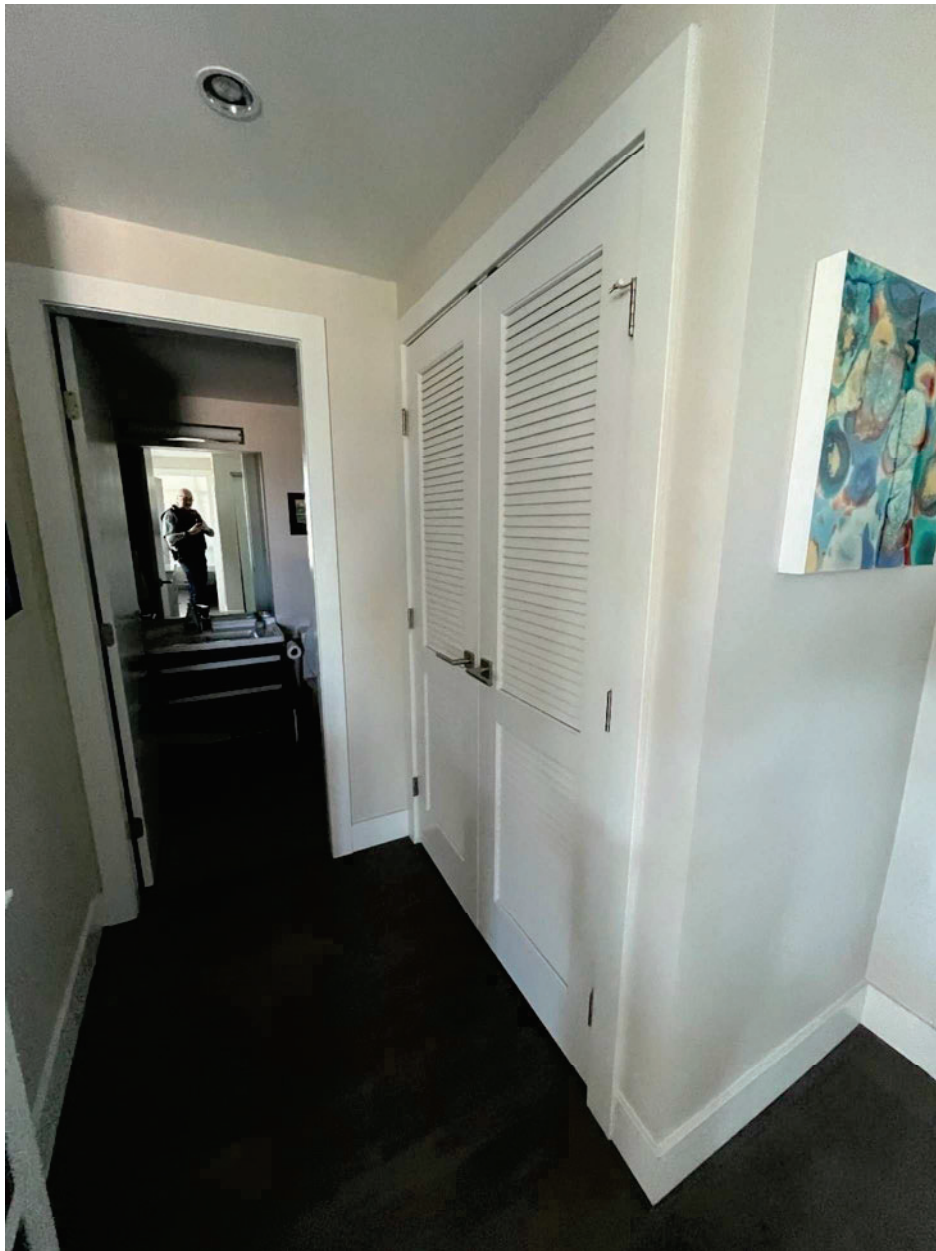


Photograph_402-960Yates_STRInspection_Interior_Entrance_Pickett_20240508



Photograph_402-960Yates_STRInspection_Interior_HallCloset_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_HallCloset_Pickett_20240508

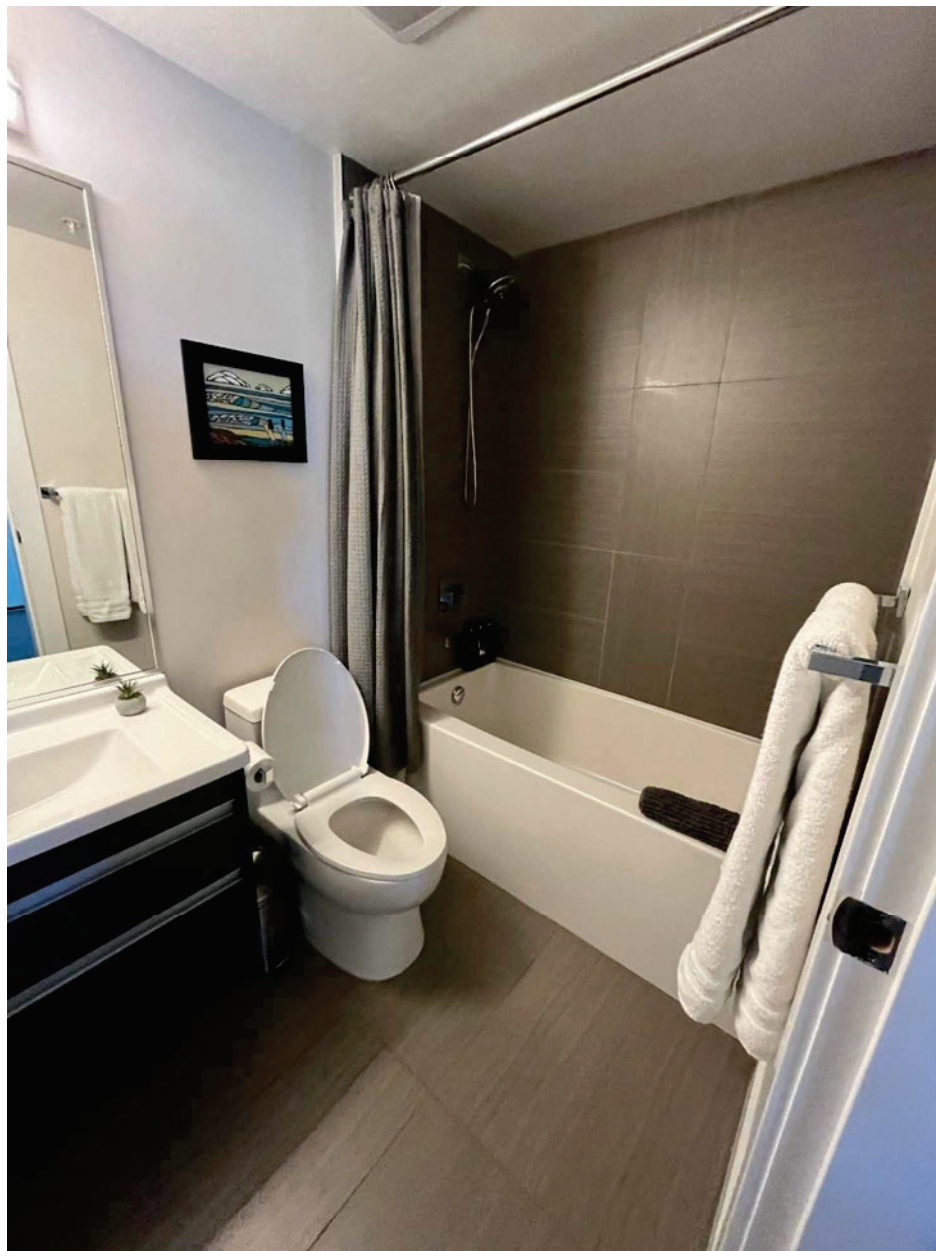


Photograph_402-960Yates_STRInspection_Interior_Washer/Dryer_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Bathroom_Pickett_20240508





Photograph_402-960Yates_STRInspection_Interior_Foyer_Pickett_20240508

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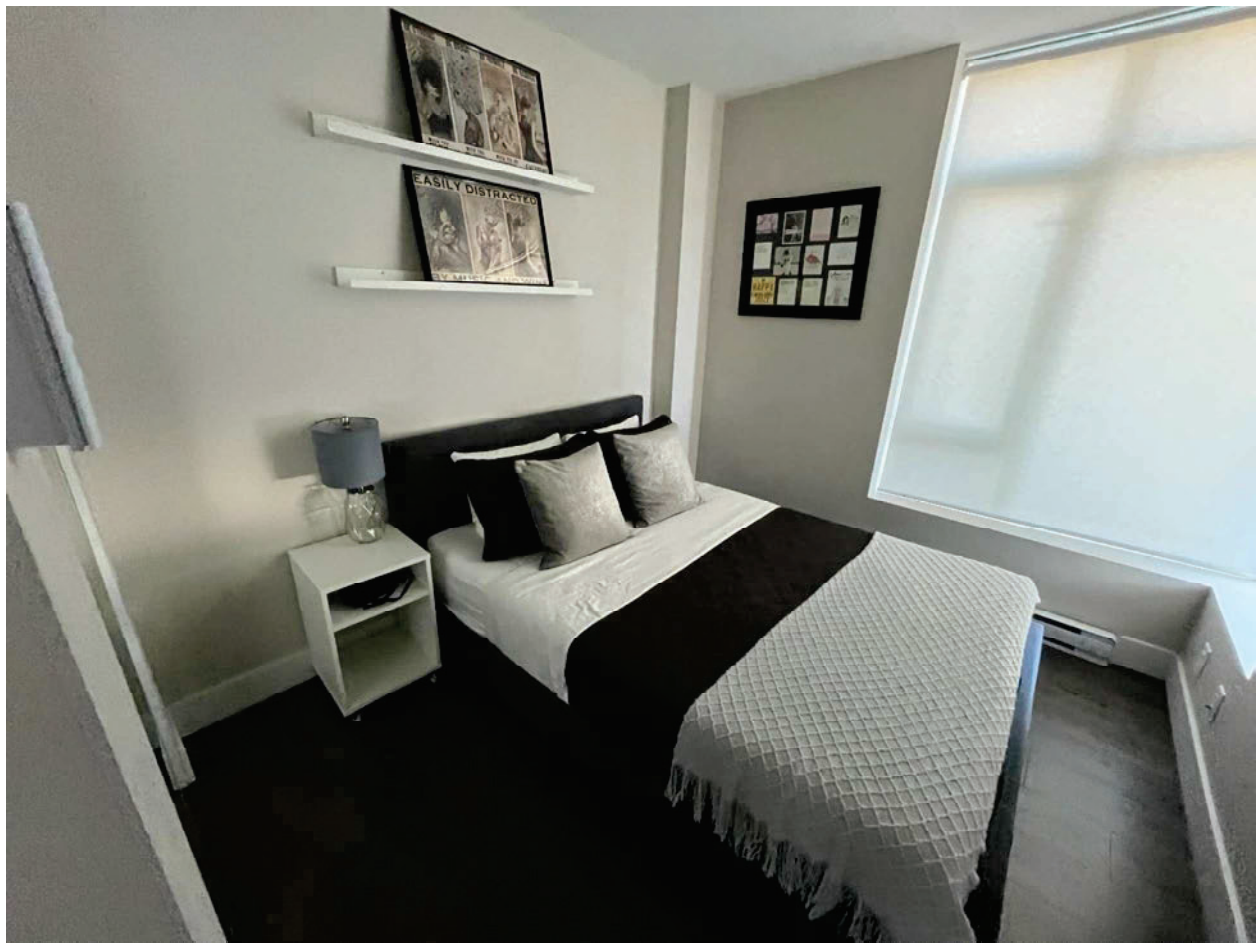
Photograph_402-960Yates_STRInspection_Interior_Bedroom1_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Bedroom1_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Bedroom1_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_OpenConcept_Pickett_20240508

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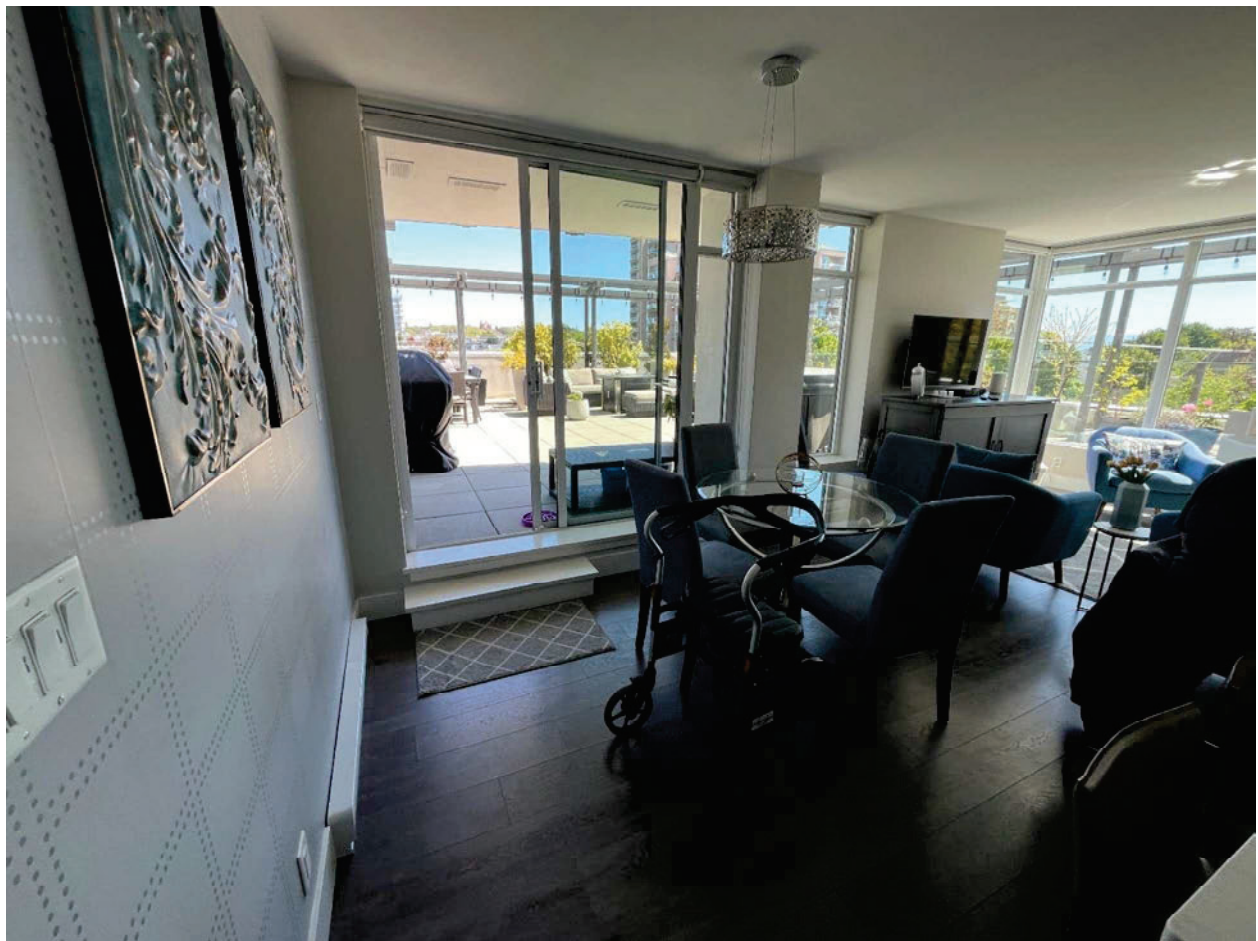
Photograph_402-960Yates_STRInspection_Interior_Kitchen_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Kitchen_Pickett_20240508

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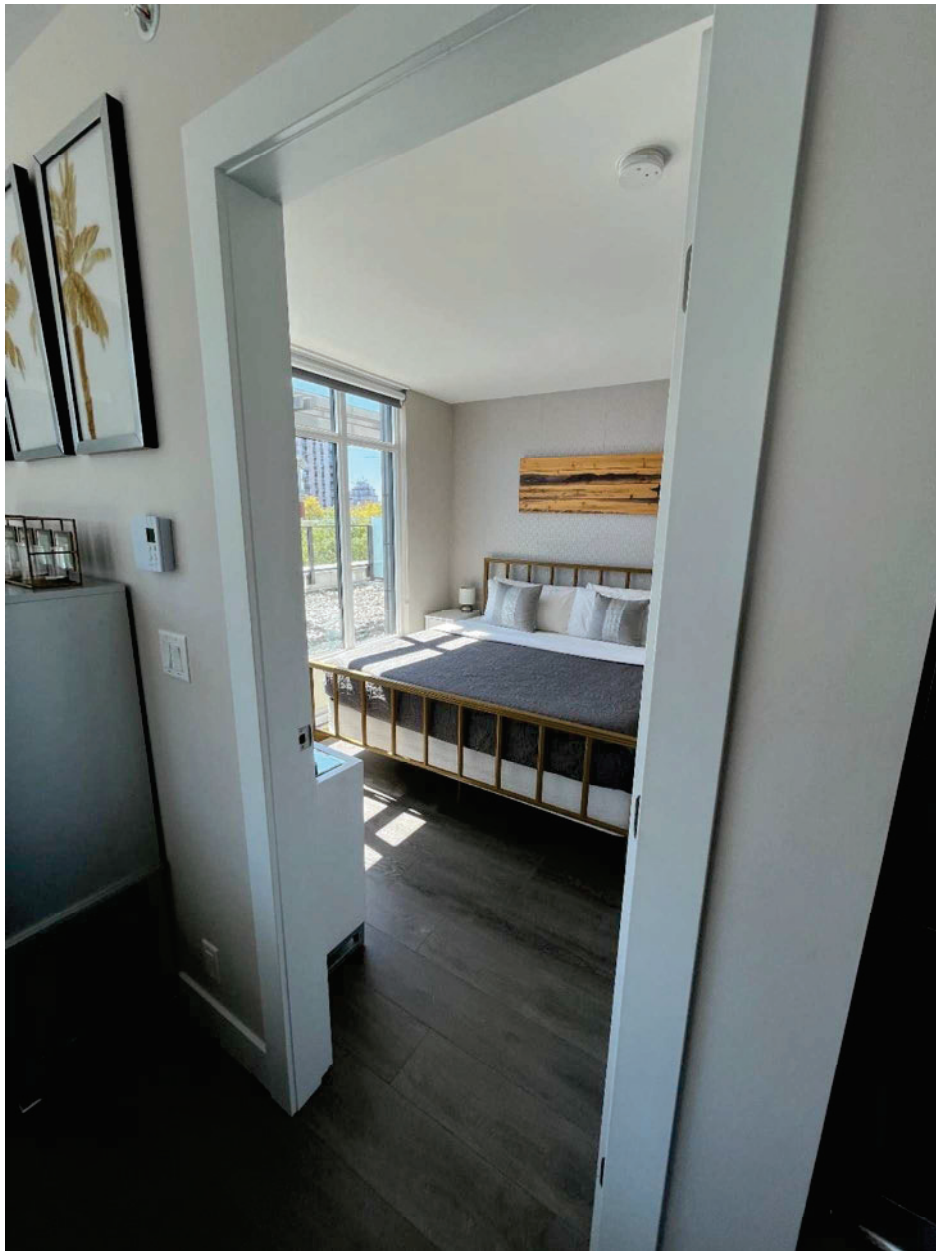


Photograph_402-960Yates_STRInspection_Interior_DiningArea_Pickett_20240508

Appendix J



Photograph_402-960Yates_STRInspection_Interior_LivingRoom_Pickett_20240508



Photograph_402-960Yates_STRInspection_Interior_Bedroom2_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Bedroom2_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Closets_Ensuite_Pickett_20240508



Photograph_402-960Yates_STRInspection_Interior_Closet_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Ensuite_Pickett_20240508

Appendix J



Photograph_402-960Yates_STRInspection_Interior_Ensuite_Pickett_20240508

Appendix J



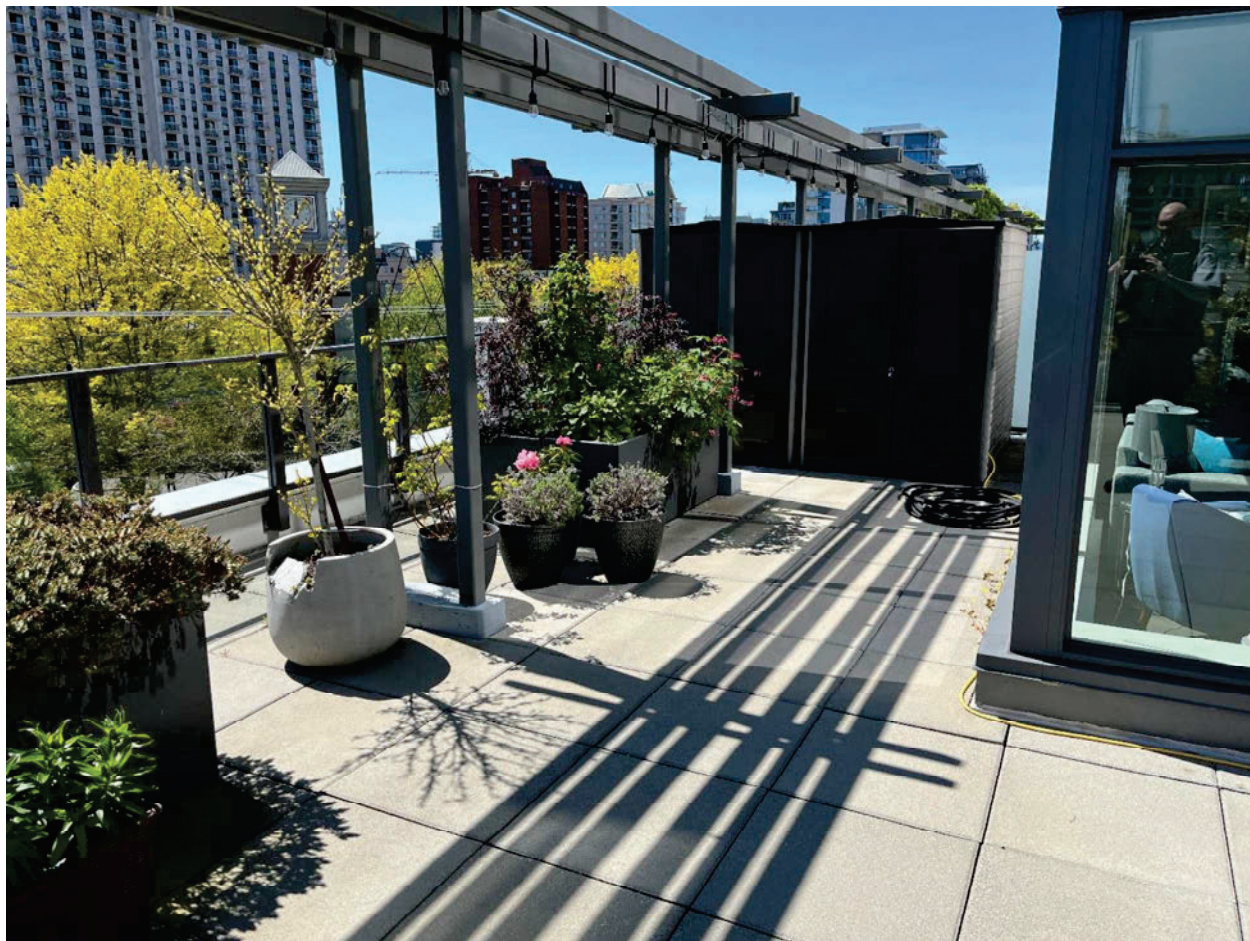
Photograph_402-960Yates_STRInspection_Interior_Patio_Pickett_20240508

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Photograph_402-960Yates_STRInspection_Interior_Patio_HotTub_Pickett_20240508

Appendix J



Photograph_402-960Yates_STRInspection_Interior_Sheds_Restricted_Pickett_20240508

Appendix J

Short-Term Rental Business Plan

402-960 Yates Street

May 8, 2024

1. Offering the whole home, while away.

Residents plan to offer their primary spaces on occasion, while away from the home.

Questions in obtaining a whole home business plan:

1: Are there specific times of the year when you plan to offer your home?

No, time away can be sporadic.

2: How long are you going to be away from home?

Around 2 weeks.

3: Where will you be when you are away? (example, on vacation or visiting out of town family)

Visting family or vacation

4: Are any of your plans subject to change?

Yes, plans are subject to change due to medical appointments.

5: Which specific room(s) will be offered to guests?

The entire suite.

6: Do you plan to restrict access to any part of the home? if yes, which spaces?

2 Storage sheds on the patio that are locked and maybe a closet.

7: How will guests access the home?

Guests are remotely buzzed in by the property management company and the suite has a keypad lock.

8: How do you plan to advertise?

Airbnb and Vrbo

9: What is the typical minimum length of stay you anticipate offering?

7 Nights

10: While you are gone, who is responsible for the property and the contact for guests?

Property Management Company – Co-Host

Appendix K

From: Tanya Dodd
Sent: January 5, 2025 11:19 AM
To: str@victoria.ca
Subject: 2025 Short Term Rental licence application
Attachments: 2025 STR App..pdf; Photo ID front.jpg; Photo ID back.jpg; 24-25 Rented Condo Policy.pdf; BC Hydro bill.pdf

Please find attached the required documentation for my 2025 short term rental business licence. I understand that I am restricted to renting my condo for 160 days per year as my primary residence. I also understand that a bylaw inspection will be necessary. I will be away for the next few weeks and would very much appreciate if an inspection could be scheduled for the week of Jan 27.

Thanks,
Tanya Dodd



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

The City of Victoria regulates short-term rentals for the benefit of residents and visitors alike. Licensing and any enforcement actions are carried out in alignment with the [City of Victoria's Strategic Plan](#) and pertinent regulations and bylaws. Please see the [Short-Term Rental](#) page if you require more information.

Important Notice:

If at some point you become ineligible to operate a short-term rental as a result of regulation changes, you will not be reimbursed or receive a discount on your licence fee.

This application must be completed in full and submitted as one package with all required supporting documents. You can submit your completed package by email to str@victoria.ca or mail it to the above address. Please note that all sections marked with an asterisk (*) are mandatory.

Any submissions that do not meet the requirements above will result in having to reapply. Owner and strata consent must be provided by signing page five and six of the application.

All related documentation and information is available at victoria.ca/str. For information or assistance completing this form, please contact Bylaw and Licensing Services at 250.361.0726 or email str@victoria.ca.

*Short-Term Rental Address (APARTMENT / UNIT / STREET ADDRESS)

Address: 402-960 Yates Street

Postal code: V8V 3M3

*Applicant Information (WHO THE LICENCE IS ISSUED TO)

An application can be submitted by an owner, tenant or management company of a property. Legal first and last names are required. Please select one of the following options:

☒ **Sole Proprietor's name:** (If you plan to operate the business on your own, either under your own name or a business name)

Tanya Dodd

LEGAL FIRST NAME, LAST NAME

☐ I use a preferred name: _____

☐ **Partnership names:** (If you plan to operate the business with one or more partners)

(1) LEGAL FIRST NAME, LAST NAME

(2) LEGAL FIRST NAME, LAST NAME

☐ I use a preferred name: _____

☐ I use a preferred name: _____

☐ **Limited/Incorporated company name:** (If you plan to operate the business as a separate legal entity, separate from yourself and your personal assets)

BUSINESS NAME



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

Limited/Incorporated Company Information (if selected)

Incorporation number: _____

Have you included your Incorporation and Notice of Articles documents?

☐ Yes

☐ No. I authorize the City of Victoria to obtain the documents of Incorporation and Notice of Articles and acknowledge that a \$30 fee plus applicable taxes will be charged by the City of Victoria for this service [Administrative Fees Bylaw No. 04-40].

Please note, documents must be provided with submission. Any documents provided historically will not be considered.

*Applicant Contact

Phone number: _____ Email: _____

*Business Plan and Required Documents

Principal Residence Requirement – If eligible, you may use your principal dwelling unit for the following purposes per Schedule D – Home Occupations.

Select all business plans that apply:

☒ Offering whole home, while you are away ☐ Offering up to two bedrooms with shared living spaces, while you are home

Please attach the following documents for proof of residence. All documents must be current, valid, not folded and easy to read.

- Government issued ID which states your address (e.g., driver's licence, BC Services Card)
- Home or rental insurance policy (stating property address, mailing address and policy holder)
- Utility bill (stating billing period, service address and mailing address)

*Designated Responsible Person

If managed by an agency, the designated responsible person can be a representative from this agency.

When an operator is not available, the designated responsible person serves as the primary contact for the short-term rental (a person who, at all times that the short-term rental is operated, has access to the premises and has the authority to make decisions in relation to the premises and the rental agreement). The responsible person must be able to attend the short-term rental premises within two hours of being requested to do so.

Relationship to Operator: Property manager

Name: Co-Hosts Vacation Rental Specialists Email: _____

Address: 18V 1m2 Phone number: _____

☒ The above Designated Responsible Person has consented to the use of their contact information.

Appendix K



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

*Business Plan and Required Documents Continued

Host name (the profile and/or name used to offer the short-term rental): Co-Hosts

Relationship to applicant (if not the same person): Property manager

Do you have another person, property manager or service company that participates in your short-term rental business? (this may include but not be limited to advertisement, management of bookings and communications with guests)

☐ No, only those declared as applicants will participate in the business

☐ Yes

If yes, please complete the information below

Select all that apply:

☒ Property manager or management company

☐ Family member

☐ Cleaning service

☐ Other _____

Property Manager or Management Company

Name of management company: Co-Hosts Vacation Rental Specialists

Name of property manager or main contact: Laura Klein

Phone number: _____ Email: _____

Business address: _____

Licence number: 00039599 Issuing municipality: Victoria, BC

If the issuing municipality is not the City of Victoria, is it:

☐ Inter-municipal

☐ Inter-community

Cleaning Service or Other Business

Name of company: _____

Name of main contact: _____

Phone number: _____ Email: _____

Business address: _____

Licence number: _____ Issuing municipality: _____

If the issuing municipality is not the City of Victoria, is it:

☐ Inter-municipal

☐ Inter-community



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

**2025 Short-Term Rental
Business Licence
Application**

Family Member

Name of individual: _____

Relationship to applicant: _____

Phone number: _____ Email: _____

Address: _____

Other

Name of individual: _____

Relationship to applicant: _____

Phone number: _____ Email: _____

Address: _____



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Owner Consent Form Short-Term Rental

***All owners are required to sign the Owner Consent Form.**

Only digitally verified signatures or signatures physically signed in ink will be accepted.

This is to certify that I Tanya Dodd, as the legal owner of
402-960 Yates Street have read the
(OWNER)
(UNIT / STREET ADDRESS)
Short-Term Rental Business Licence Application Form submitted by Tanya Dodd
(APPLICANT)

and consent to the above premises being used as a Short-Term Rental in compliance with City of Victoria Bylaws.

I, the undersigned, confirm as the business owner(s)/operators(s) that the above noted information is true and will comply with ALL relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Owner's name: Tanya Dodd

Owner's signature: _____ Date: Dec 7/2024.

Owner's name: _____

Owner's signature: _____ Date: _____

Owner's name: _____

Owner's signature: _____ Date: _____

Owner's name: _____

Owner's signature: _____ Date: _____

If your application is received more than 60 days after consent is given above, it is not considered valid consent.



Bylaw and Licensing Services Department
1 Centennial Square
Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Strata Council Consent Form Short-Term Rental

*Is this property part of a strata? No ☐ Yes ☒ If yes, please complete the information below.
Only digitally verified signatures or signatures physically signed in ink will be accepted.

This is to certify that I Mark Arrojado, as Strata Council Executive Member
(STRATA COUNCIL EXECUTIVE MEMBER; MUST NOT BE SAME AS APPLICANT)
for 402-960 Yates Street have read the Short-Term Rental Business Licence Application Form
(UNIT / STREET ADDRESS)
submitted by Tanya Dodd. I can confirm that our Strata has no bylaws prohibiting the above
(APPLICANT)
address from operating as a Short-Term Rental in compliance with City of Victoria Bylaws.

I, the undersigned, confirm as the business owner(s)/operators(s)/licencee(s) that the above noted information is true and will comply with ALL relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Applicant's name(s): Tanya Dodd
Applicant's signature(s): _____ Date: Dec 7 2024
(if applicable) 2. _____ Date: _____

Strata Council Executive Member Information

I, the undersigned, confirm as the strata council executive member that the above noted information is true and will comply with all relevant provisions of the Short-Term Rental Regulation Bylaw No. 18-036 and all other applicable City bylaws.

Name: Mark Arrojado
Phone number: _____
mail: _____
Signature: _____ Date: Dec: 8, '24

your application is received more than 60 days after consent is given above, it is not considered valid consent.



Bylaw and Licensing Services Department
 1 Centennial Square
 Victoria, BC V8W 1P6

str@victoria.ca
victoria.ca/str

2025 Short-Term Rental Business Licence Application

Completion of this application does not guarantee approval. Approved licences will be issued only upon receipt of payment of the Short-Term Rental Business Licence fee. Operating a Short-Term Rental without a valid licence is an offence for which penalties are prescribed. A person found guilty of an offence under this bylaw is subject to a fine of not less than \$250 and not more than \$500 for every instance that an offence occurs or each day that it continues (*Short-Term Rental Regulation Bylaw No. 18-036; Sec. 8*).

Licences are effective from January 16 to January 15 of the following year, are non-transferable and the licence fee(s) paid are non-refundable. Short-Term Rental Business Licences must be re-applied for at the start of each calendar year and must include up-to-date supporting documentation.

Please see website for:

[Short-Term Rental Regulation Bylaw No. 18-036](#)

[Short-Term Rental Regulation Bylaw Amendment 24-059](#)

[Schedule D – Home Occupations; Zoning Regulation Bylaw No. 80-159](#)

Privacy Notification: This information is being collected for the purpose of determining the Operator's eligibility for a Short-Term Rental Business Licence in the City of Victoria pursuant to its bylaws. In providing this information, you have consented to its use for the above-described purpose and declare that all the information provided herein is correct. This information may be shared with applicable City of Victoria departments and related agencies for the purpose of required inspections and approval of this licence application. The legislated authority to collect your personal information is Section 26 (c) of the *Freedom of Information and Protection of Privacy Act* and Section 3 (2) of the *Short-Term Rental Regulation Bylaw*. If you wish to obtain further information regarding the collection of your personal information, please contact the Information Access and Privacy Analyst Archives and Records Management, 1 Centennial Square, Victoria, BC V8W 1P6, 250.361.0347 or email foi@victoria.ca.

*Declaration:

I, the undersigned, confirm as the business owner(s)/operators(s) that the above noted information is true and will comply with ALL relevant provisions of the *Short-Term Rental Regulation Bylaw No. 18-036* and all other applicable City bylaws. Further, failure to meet these obligations may result in the business licence being suspended or reported to City Council for possible revocation. **I understand I cannot commence business until such time as a Short-Term Rental Business Licence has been approved, paid in full and issued.**

Applicant name(s) (printed): Tanya Dodd

Applicant signature(s): [Signature] Date signed: Dec 7, 2024

(if applicable) 2. _____ Date signed: _____, 20____

Only digitally verified signatures or signatures physically signed in ink will be accepted.

Date Stamp (office use only)

THIS POLICY CONTAINS ONE OR MORE CLAUSES THAT MAY LIMIT THE AMOUNT PAYABLE.

The insurance contract consists of these Declarations Pages as well as all the coverage wordings, riders, endorsements and the application that are attached hereto.

NOTICE TO POLICYHOLDER: Your completed application is included in this document. This application contains the information which Insurers have relied upon to provide this Insurance and forms part of the insurance policy contract. Please review this application in detail for accuracy. By accepting this insurance policy, you agree that the information provided in the application is accurate and true. Any misrepresentation or omission will render the Policy null and void from inception

In the event of an occurrence likely to result in a claim under this insurance, immediate notice must be given to Forward Insurance Managers Ltd. All inquiries and disputes are also to be addressed to Forward Insurance Managers Ltd.

Policy No.

Purpose of this document: RENEWAL
COASTAL COMMUNITY INSURANCE

Brokerage:

FWD1634
PO BOX 607 PARKSVILLE BRITISH COLUMBIA ,CANADA V9P 2G7

Named Insured(s):

1-888-741-1010

Mailing Address:

TANYA DODD
402-960 YATES STREET VICTORIA , BC V8V 3M3

Period of Insurance:

FROM: 7/26/2024 TO: 7/26/2025

MM/DD/YYYY

Both at 12:01AM Standard Time at the Named Insured's mailing address

Loss Payees (if any):

ABSENCE OF ANY ENTRY DENOTES LOSS PAYABLE TO THE NAMED INSURED(S).

Risk Location	402 - 960 YATES STREET VICTORIA , BC, V8V 3M3
Protection Grade	FUS 1
Occupancy	RENTED TO OTHERS - SHORT TERM
Year Built / Building Type	2018 / LOW RISE APARTMENT
Earthquake Zone	ZONE 3

Coverages	Limit of Insurance	Deductible	Premium
Section One - Property Insurance			
Personal Property			Included
Additional Living Expenses – Rental Value			Included
Unit Owners Improvements and Betterments			Included
Loss Assessment Coverage - Property (Collectively Owned)			Included
Condominium Unit Owners Contingent Insurance (Your Unit)			Included
Condominium Deductible Assessment Coverage			Included
Section Two - Personal Liability Insurance			
Voluntary Property Damage Payments to Others			Included
Voluntary Medical Payments to Others			Included
Section Three – Voluntary Compensation for your Residence Employees		N/A	\$0
Section Four – Credit and Debit Card Coverage		N/A	\$0
Earthquake	Included	20%	
Water Damage Deductible			Included
Sewer Backup	Included		

POLICY FORMS + ENDORSEMENTS:

Form #D2-A Rev. June 7, 2023 Condominium Unit Owners Prestige Form
Form #CDDTE-01 Rev. May 2, 2022 Condominium - Damage Due to Tenants Exclusion Endorsement
Form #PLRE Rev. Oct. 26, 2022 Premises Liability Restriction Endorsement
Form #SBCE-02 Rev. Jan. 4, 2022 Sewer Backup Coverage Endorsement
Form #CX2A-02 Rev. Dec 6, 2022 Earthquake or Volcanic Eruption - Condominium Unit Owners
Form #SDAN-01 Rev. October 20, 2023 Standard Disclosures and Notices
Form #SSE242-24 Rev. March 27, 2024 Standard Schedule of Endorsements
Form #SSC-03 Rev. February 14, 2024 Schedule of Statutory Conditions



Policy Premium:

In witness whereof this policy has been signed as authorized by the Insurer(s) on the attached List of Subscribing Companies, by

Authorized Agent
Forward Insurance Managers Ltd. Per:

Forward Insurance Managers Ltd. – STATEMENT OF ACCOUNT	Total Premium:	
900 – 543 Granville Street	MUA Policy Fee:	
Vancouver, BC V6C 1X8	Total Due:	

SUBSCRIPTION POLICY - LSW1554

IN CONSIDERATION OF THE INSURED having paid or agreed to pay each of the INSURERS named in the List of Subscribing Companies forming part hereof, or to INSURERS whose names are substituted therefor or added thereto by endorsement, hereinafter called "THE INSURERS", the Premium set against its name in the List of Subscribing Companies (attached hereto),

THE INSURERS SEVERALLY AND NOT JOINTLY agree, each for the Sum(s) Insured or Percentage(s) and for the Coverage(s) Insured set against its name in the List of Subscribing Companies, and subject always to the terms and conditions of this Policy, that if a loss occurs for which insurance is provided by this Policy at any time while it is in force, they will indemnify the INSURED against the loss so caused; the liability of each insurer individually for such loss being limited to that proportion of the loss payable according to the terms and conditions of this Policy which the Sum Insured or the amount corresponding to the Percentage set against its name in the List of Subscribing Companies, or such other sum or percentage as may be substituted therefor by endorsement, bears to the total of the sums insured or of the amounts corresponding to the percentages of the sums insured respectively set out against the coverage concerned on the Declarations page(s).

That as regards each item of property insured which is lost or damaged at any time while this Policy is in force by a peril for which insurance is provided by the terms and conditions of this Policy, the liability of each Insurer individually shall be limited to whichever is the least of:

- that proportion of the actual cash value of the property at the time of the loss, destruction or damage which the amount of the sum insured under this Policy in respect of that property against that peril corresponding to the individual Insurer's proportion of the total sum insured for the coverage concerned as appears from the entry set against its name in the List of Subscribing Companies bears to the total sum insured under this Policy in respect of that property against that peril, or
- that proportion of the interest of THE INSURED in the property which the amount of the sum insured under this Policy in respect of that property against that peril corresponding to the individual insurer's proportion of the total sum insured for the coverage concerned as appears from the entry set against its name in the List of Subscribing Companies bears to the total sum insured under this policy in respect of that property against that peril, or
- that proportion of the limit of insurance stipulated in respect of the property lost, destroyed or damaged which the amount of the sum insured under this Policy in respect of that property against that peril corresponding to the individual insurer's proportion of the total sum insured for the coverage concerned as appears from the entry set against its name in the List of Subscribing Companies bears to the total sum insured under this Policy in respect of that property against that peril,

Provided however, that where the insurance applies to the property of more than one person or interest THE INSURERS' total liability for loss sustained by all such persons and interests shall be limited in the aggregate to the specified limit or limits of liability.

If this Policy contains a Co-Insurance Clause or a Guaranteed Amount (Stated Amount) Clause, and subject always to the limit of liability of each Insurer corresponding to the percentage of the sum insured by this Policy as set out above, no Insurer shall be liable for a greater proportion of any loss or damage to the property insured, than the sum insured by such Insurer bears to:

- that percentage, stated in the Co-Insurance Clause, of the actual cash value of the said property at the time of loss, or
- the Guaranteed Amount (Stated Amount) of total insurance stated in the Guaranteed Amount (Stated Amount) Clause, as the case may be.

If the insurance under this Policy is divided into two or more items, the foregoing shall apply to each item separately.

Wherever in this Policy, or in any endorsement attached hereto, reference is made to "The Company", "The Insurer", "This Company", "we", "us", or "our", reference shall be deemed to be made to each of the Insurers severally.

This policy is made and accepted subject to the foregoing provisions, and to the other provisions, stipulations and conditions contained herein, which are hereby specially referred to and made a part of this Policy, as well as such other provisions, agreements or conditions as may be endorsed hereon or added hereto.

IN WITNESS WHEREOF THE INSURERS through their representative(s) duly authorized by them for this purpose have executed and signed this Policy.

LIST OF SUBSCRIBING COMPANIES

Attaching to and forming a part of Policy No:

The Insurers:	Coverage(s) Insured	Sum(s) Insured or Percentage(s)	Premium
Lloyd's Underwriters under Contract No.		65%	
HDI Global Specialty SE		20%	
The Sovereign General Insurance Company		15%	
TOTAL PREMIUM:			

Where Lloyd's Underwriters are subscribing insurers to the Policy, the following applies:

IDENTIFICATION OF INSURER / ACTION AGAINST INSURER

This insurance has been entered into in accordance with the authorization granted to the Coverholder by the Underwriting Members of the Syndicates whose definitive numbers and proportions are shown in the Table attached to the Agreement shown in the List of Subscribing Companies (hereinafter referred to as "the Underwriters"). The Underwriters shall be liable hereunder each for his own part and not one for another in proportion to the several sums that each of them has subscribed to the said Agreement.

In any action to enforce the obligations of the Underwriters they can be designated or named as "Lloyd's Underwriters" and such designation shall be binding on the Underwriters as if they had each been individually named as defendant. Service of such proceedings may validly be made upon the Attorney In Fact in Canada for Lloyd's Underwriters, whose address for such service is Royal Bank Plaza South Tower, 200 Bay Street, Suite 2930, P.O. Box 51 Toronto, Ontario M5J 2J2.

NOTICE

Any notice to the Underwriters may be validly given to Forward Insurance Managers Ltd.

For the purpose of the Insurance Companies Act (Canada), this Policy was issued in the course of Lloyd's Underwriters' insurance business in Canada. The business insured/reinsured herein meets the necessary conditions to qualify as, "insuring in Canada a risk" in accordance with Party XIII of the Insurance Companies Act (Canada).

Several Liabilities Clause – 5096 (Combined Certificate)

PLEASE NOTE – This notice contains important information. PLEASE READ CAREFULLY

The liability of an insurer under this contract is several and not joint with other insurers party to this contract. An insurer is liable only for the proportion of liability it has underwritten. An insurer is not jointly liable for the proportion of liability underwritten by any other insurer. Nor is an insurer otherwise responsible for any liability of any other insurer that may underwrite this contract.

The proportion of liability under this contract underwritten by an insurer (or, in the case of a Lloyd's syndicate, the total of the proportions underwritten by all the members of the syndicate taken together) is shown in this contract.

In the case of a Lloyd's syndicate, each member of the syndicate (rather than the syndicate itself) is an insurer. Each member has underwritten a proportion of the total shown for the syndicate (that total itself being the total of the proportions underwritten by all the members of the syndicate taken together). The liability of each member of the syndicate is several and not joint with other members. A member is liable only for that member's proportion. A member is not jointly liable for any other member's proportion. Nor is any member otherwise responsible for any liability of any other insurer that may underwrite this contract. The business address of each member is Lloyd's, One Lime Street, London EC3M 7HA. The identity of each member of a Lloyd's syndicate and their respective proportion may be obtained by writing to Market Services, Lloyd's, at the above address.

Although reference is made at various points in this clause to "this contract" in the singular, where the circumstances so require this should be read as a reference to contracts in the plural.

CONDOMINIUM UNIT OWNERS INSURANCE - APPLICATION FOR INSURANCE

Please read carefully - Please review this application in detail for accuracy. If there are any misrepresentations or omissions in the application, any insurance quote is deemed to be void, and any subsequent insurance policy will be rendered null and void from inception.

APPLICANT:	
Applicant Name (Legal Name):	Tanya Dodd
Please confirm the type of registered owner:	Individual(s)
Date of Birth:	3/11/1977
Mailing Address:	402-960 YATES STREET VICTORIA , BC V8V 3M3
ADDITIONAL INSURED	
Does a City / Municipality / District need to be added due to rentals in the condominium?	No
INSURANCE + LOSS HISTORY:	
Does the Applicant(s) currently or have they previously held a policy with Forward Insurance Managers Ltd.?	Yes
Policy Number:	
Have there been any claims or losses (whether covered by insurance or not) at this location in the past 5 years?	Yes
For each loss / claim please complete the information below	
Claim 1 - Date	06-16-2024
Claim 1 - Type of loss	Water
Claim 1 - Total Amount (paid or reserve)	\$0
Claim 1 - Open / Closed	Open
Claim 1 - Was Damage professionally repaired?	No
Has the applicant had more than one claim in the last 5 years?	No
Has insurance ever been cancelled MID-TERM by a carrier (eg. cancelled by registered letter)?	No
OCCUPANCY:	
Confirm occupancy:	Rented to Others - Short Term
How long is the rental?	Short-Term (daily, weekly)
Are these short-term vacation rentals (ex. Airbnb/VRBO or managed by insured/property manager)?	Yes
Is there any business, or commercial operations in the applicant's unit?	No
RISK INFO:	
RISK LOCATION:	
Risk Location:	402 - 960 YATES STREET VICTORIA , BC, V8V 3M3
WILDFIRE EXPOSURE:	
Has the risk ever been evacuated or issued an evacuation order or alert, due to wildfire?	No
Is this risk located within 25kms of a current wildfire?	No
FLOOD EXPOSURE:	
Has the risk location ever been evacuated or put on notice of evacuation due to a flood?	No
Is this risk located in an area that is currently under flood warning?	No
BUILDING INFO:	
Type of building the unit is located in:	Low Rise Apartment
Are there any commercial occupancies in the building?	Yes
Are there any restaurants in the building?	No
Are there any industrial/manufacturing, or automotive related occupancies in the building?	No
Construction type of building the unit is located in:	Fire Resistive
Year built:	2018
Does the condo have a solid fuel heat device (other than a traditional fireplace)?	No
Will there be any renovations to the home in the next 12 months?	No
DWELLING UPDATES:	
Plumbing	
Year of hot water tank(s):	2018
Type of plumbing:	Copper, PEX, PVC, ABS
Year of most recent plumbing update:	2018
Roof	
Roofing material:	Flat Deck / Tar + Gravel
Year of complete roof replacement:	2018
Electrical	
How many Amps is the electrical system?	100 amps or more
Electrical system details:	Circuit Breakers
Type of wiring:	Copper
Year of most recent electrical update:	2018
COVERAGES:	
Personal Property:	
Unit Owners Improvements and Betterments -	
Select higher limit:	

CONDOMINIUM UNIT OWNERS INSURANCE - APPLICATION FOR INSURANCE



Loss Assessment	
Annual Rental Income:	
Condominium Deductible Assessment Coverage (restricted to events covered by this unit owners Policy if bound) - cluded by default	
Select higher limit:	
Premises Liability	
Select limit:	
Deductible	
Select deductible:	\$
Earthquake	
Is earthquake coverage requested?	Yes
Sewer Backup	
Is sewer backup coverage requested?	Yes
ISSUANCE INFO:	
Proposed Effective Date (MM/DD/YYYY):	7/26/2024
Applicant's Contact Email Address for E-signatures:	
Mailing Address:	402-960 Yates Street Victoria , BC V8V 3M3
WILDFIRE + FLOOD:	
Is this risk located within 25kms of a current wildfire?	No
Is this risk located in an area that is currently under flood warning?	No

Appendix L

Marissa Peluso

From: str@victoria.ca
Sent: April 24, 2025 9:01 AM
To: Emma Crockett
Subject: Fw: 2025 STR INSPECTION - 402 960 YATES

From: Tanya Dodd
Sent: Friday, January 24, 2025 7:58 PM
To: str@victoria.ca <str@victoria.ca>
Subject: Re: 2025 STR INSPECTION - 402 960 YATES

Ok, if that is the purpose of the inspection, I will leave as is.

On Fri, Jan 24, 2025 at 11:56 AM str@victoria.ca <str@victoria.ca> wrote:
Hi Tanya

Our office can not predict the outcome of an inspection.

Inspections are conducted to help establish principal residence and to review the proposed business plan. If you believe your current circumstances with the flood damage may impact your inspection, you may wish to reschedule your inspection.

Please let our office know if you require your inspection rescheduled.

Kind regards,

Emma Crockett (she/her)

Short-Term Rental Administrator

Bylaw Services

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees Nation and Xwsepsum Nation.

From: Tanya Dodd
Sent: January 24, 2025 11:28 AM
To: str@victoria.ca
Subject: Re: 2025 STR INSPECTION - 402 960 YATES

Hi Emma,
My question is whether or not the unit needs to be in rentable condition for the inspection. Or can the inspection proceed even if the unit is not currently in rentable condition?
If the inspector is going to fail me on the inspection because the unit is not currently in rentable condition, then I will reschedule.
But if they are simply wanting to speak with me and can see past the repairs, I would prefer to continue as planned.
Thanks,
Tanya

On Fri, Jan 24, 2025 at 11:24 AM str@victoria.ca <str@victoria.ca> wrote:

Good morning Tanya,

Our office can not make that determination for you.

My suggestion would be connecting with your insurance adjuster or who ever is professionally assessing the level of flood damage to determine.

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Please let our office know if you require your inspection rescheduled.

Kind regards,

Emma Crockett (she/her)

Short-Term Rental Administrator

Bylaw Services

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6



The City of Victoria is located on the homelands of the Songhees Nation and Xwsepsum Nation.

From: Tanya Dodd

Sent: January 24, 2025 10:56 AM

To: str@victoria.ca

Subject: Re: 2025 STR INSPECTION - 402 960 YATES

Hi again,

My unit is currently being repaired due to flooding and the repairs will not be complete by this date. Is it still possible to proceed with the inspection?

Thanks,

Tanya Dodd

On Thu, Jan 9, 2025 at 3:19 PM Tanya Dodd

wrote:

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That would be fantastic, thank so much!

On Fri, Jan 10, 2025 at 6:04 AM str@victoria.ca <str@victoria.ca> wrote:

Hi Tanya,

I have a slot held for you on Thursday January 30th at 130pm.

Please let me know if that works for your schedule.

Kind regards,

Emma Crockett (she/her)

Short-Term Rental Administrator

Bylaw Services

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6

The City of Victoria is located on the homelands of the Songhees Nation and Xwsepsum Nation.

From: Tanya Dodd

Sent: January 9, 2025 2:06 PM

To: str@victoria.ca

Subject: Re: 2025 STR INSPECTION - 402 960 YATES

Hi Emma,

Thanks for this. Are there any appointments available later in the week of the 27th?

Kind Regards,

Tanya Dodd

On Fri, Jan 10, 2025 at 4:59 AM str@victoria.ca <str@victoria.ca> wrote:

Hello,

Thank you for applying for a 2025 Short-Term Rental Business Licence.

The next step in processing your application is to schedule an inspection of the property. Applicants must attend the inspection.

Attached are four documents for you to review prior to your inspection.

Please note, as stated in the attached document “What You Need to Know” if the Inspecting Officer determines that there is a valid reason to inspect an area, you will be asked to grant access. Unless it is unreasonable to inspect those areas at that time, you are required to provide access.

Appendix L

Your reply to this email will be taken as confirmation you have read and understand all the attached documents. Please let our office know if you are unable to view the attached PDFs or if you have any questions.

Bylaw Officer DUARTE will be available to conduct the inspection at either the following times:

TUESDAY JANUARY 21ST AT 930AM

Or

MONDAY JANUARY 27TH AT 930AM

The dates given above are the earliest available and we do not have a cancellation list. Please advise which date is preferred.

If the suggested dates above conflict with your schedule, please let our office know at your earliest convenience.

Kind regards,

Emma Crockett (she/her)

Short-Term Rental Administrator

Bylaw Services

City of Victoria

1 Centennial Square, Victoria BC V8W 1P6

The City of Victoria is located on the homelands of the Songhees Nation and Xwsepsum Nation.

STR Licensing Inspection – Officer Statement – Part 1	
OFFICER NAME	<input type="checkbox"/> Nelson Duarte – Bylaw Officer <input type="checkbox"/> Michael Pickett – Bylaw Officer <input checked="" type="checkbox"/> Lauren Carr – Bylaw Officer <input type="checkbox"/> Robert Halkett – Bylaw Officer <input type="checkbox"/> Andrew Dolan – STR Supervisor
ADDRESS	402 960 Yates
INSPECTION DATE	2025-01-30
INSPECTION TIME	1:30 PM
LICENCE ACCT#	00044814
BYLAW FILE / CFS#	283298
LICENCE TYPE	<input checked="" type="checkbox"/> Short-term Rental (STR) <input type="checkbox"/> Bed & Breakfast (B&B)
OFFICER ATTIRE	<input checked="" type="checkbox"/> Full uniform (with PPE including vest) <input type="checkbox"/> Uniform (with PPE but no vest) <input type="checkbox"/> Uniform (without PPE) <input type="checkbox"/> Civilian clothes (with PPE but no vest) <input type="checkbox"/> Civilian clothes (without PPE)
FOOT COVERINGS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not required – Why?
ATTENDANCE	<input checked="" type="checkbox"/> Owner – Name: Tanya DODD

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	<input type="checkbox"/> Host – Name: <input type="checkbox"/> Property Manager – Name: <input type="checkbox"/> Other – Name:
DOCUMENTS PROVIDED	<input type="checkbox"/> Bylaw Inspections Q&A <input type="checkbox"/> Short-Term Rental Regulation Bylaw <input type="checkbox"/> Short-Term Rental Zoning Amendment Bylaw <input type="checkbox"/> Schedule D – Zoning Regulation Bylaw <input type="checkbox"/> Documents read and understood?
PRIOR INSPECTION	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
STR Licensing Inspection – Officer Statement – Part 2	
OBSERVATIONS:	
<p>CARR attended the inspection with BO MCNEILL. Upon arriving in the unit, CARR immediately observed that the unit was under construction. She asked DODD for clarification regarding the state of the unit. DODD had informed her that her unit had flooded twice in 2024. With the most recent flood occurring in November of 2024. CARR then asked when it would be complete. DODD advised that it would be done in mid March. CARR then began the inspection and asked DODD if her unit had previously been inspection. To which she replied yes, several times. She stated that in the past, she had previously applied for non-principle and that in 2024, she held a non-principal licence, then switched to a principal licence following the May legislation.</p> <p>CARR then began the inspection around the unit. She observed that the bedrooms and bathrooms were heavily under construction and not usable. The guest bedroom featured a advertisement for Co-Host. The primary bedroom and ensuite were also un-finished and un-usable.</p> <p>Furniture and clothing in bags were all pushed in to the middle of the room. A couch was visibly exposed, and DODD pointed to it, stating that she had been sleeping on the couch. CARR then stated, “well you’re not living here full time, because its under construction, so where are you staying?” DODD stated that she was “bouncing from hotel to hotel” due to</p>	

Appendix M

the flood. CARR then stated, “so this is your principal residence, but it is not the place that you are currently using as your principal residence”. DODD slightly avoided the question by confirming that this was her principal residence, and asking how it could be questioned if this was her principal residence. CARR then clarified by saying that yes, this could be her principal residence, but she was not living in it at the moment due to the construction. DODD did not reply.

CARR then began to enquire about the business plan. DODD stated that she would like to offer the whole home while away but would not like to have people staying with her. DODD then began to share her desired plan. She stated that she would like to rent her whole home, while away, for 160 nights of the year. She stated that she is on disability following an autoimmune diagnosis, and that she will go live in Mexico with her father specifically so that she can STR her unit. She stated that due to her diminished income while on disability, this was her only option to pay her mortgage. She stated that she would be going into debt if she was not approved, and that she hoped the city would not like to make homeowners lose their homes. Additionally, DODD advised that she would offer her home during “peak season” to increase income potential. It is the opinion of CARR that DODD will be leaving her home, for the purpose of offering an STR at a 2-night minimum. DODD advised that she will be using a property management company “Co-Host” who will be managing all things STR related at the unit. DODD also asked that her approval be sent via email in case she was not in the city to collect it.

It is important to note that DODD’s unit is currently under construction. Making it difficult to decipher if it is her principal residence. Additionally, at this time, DODD is bouncing around from hotel to hotel and is not using it as a principal residence due to flood restoration.

OFFICER SIGNATURE	LC
COMPLETION DATE	2025-01-30

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Short-Term Rental Business Plan – 402 960 Yates – Tanya DODD

The inspection is an important component in the application process, as it is used to determine if the space and applicants' business plan will meet the requirements and conditions of a principal residence licence.

During the inspection, officers must obtain an understanding of the business plan(s) to determine the eligibility. This includes:

A. Which business plan(s) are they wanting to operate.

B. Which spaces are being offered and or not offered. Example: One single bedroom, plus the whole home is open to guests with exception of the primary bedroom and the homeowner does not want guests in the back yard due to the potential of the steps on the deck being slippery at this time of year.

C. How they plan to operate (duration, frequency etc.).

1. Offering the whole home, while away. **Yes**

Residents plan to offer their primary spaces on occasion, while away from the home.

The space being offered is their entire principal dwelling unit, meaning it is occupied by the resident daily.

Questions in obtaining a whole home business plan:

1: Are there specific times of the year when you plan to offer your home? **Peak travel season for increased income. Summer months**

2: How long are you going to be away from home? **160 days**

3: Where will you be when you are away? (example, on vacation or visiting out of town family) **Mexico living with father, or elsewhere with family**

4: Are any of your plans subject to change? **Yes**

5: Do you plan to restrict access to any part of the home? if yes, which spaces? **A locked closet**

6: How will guests access the home? **property managers will deal with this**

8: How do you plan to advertise? **Airbnb or VRBO**

9: What is the typical minimum length of stay you anticipate offering? **2 nights**

10: While you are gone, who is responsible for the property and the contact for guests? **Desiree and Laura with Co-Host**

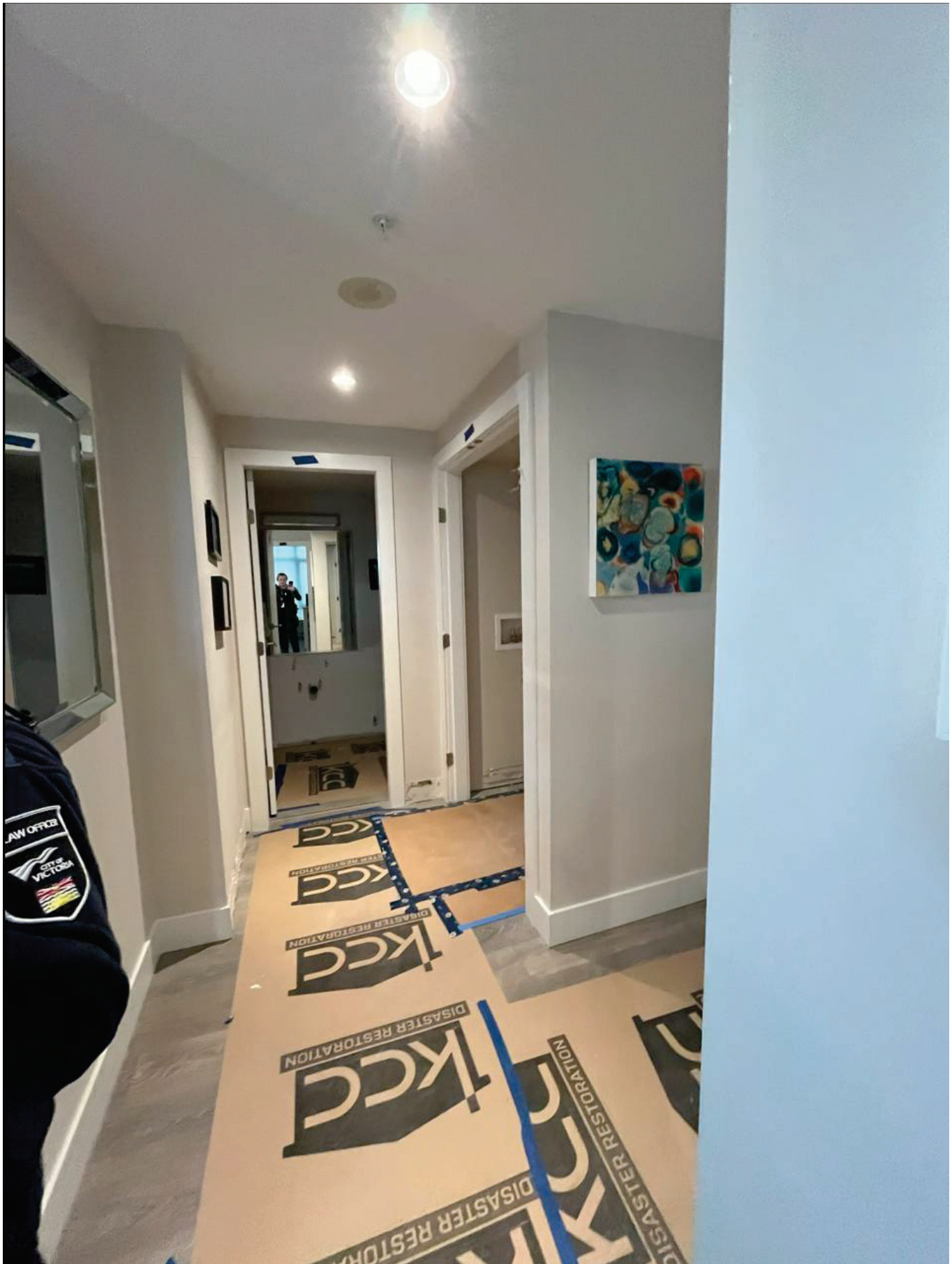
11: Is this your principle residence? Do you own other properties? **Principle residence but currently “bouncing back and forth in hotels” due to flood restoration in apartment.**

Appendix M

January 30, 2025, Inspection: 402-960 Yates Street, 16 images.

Images 1-2: Front entry ("A" on floor plan).





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Images 3- 6: Living room and kitchen ('B' on floor plan)



January 30, 2025, Inspection: 402-960 Yates Street







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Images 7-8: Primary bedroom ('C' on floor plan)



January 30, 2025, Inspection: 402-960 Yates Street



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Image 9: Primary ensuite



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Image 10: Bathroom ('D' on floor plan)



January 30, 2025, Inspection: 402-960 Yates Street

Appendix M

Image 11: Washer and dryer closet ('E' on floor plan)



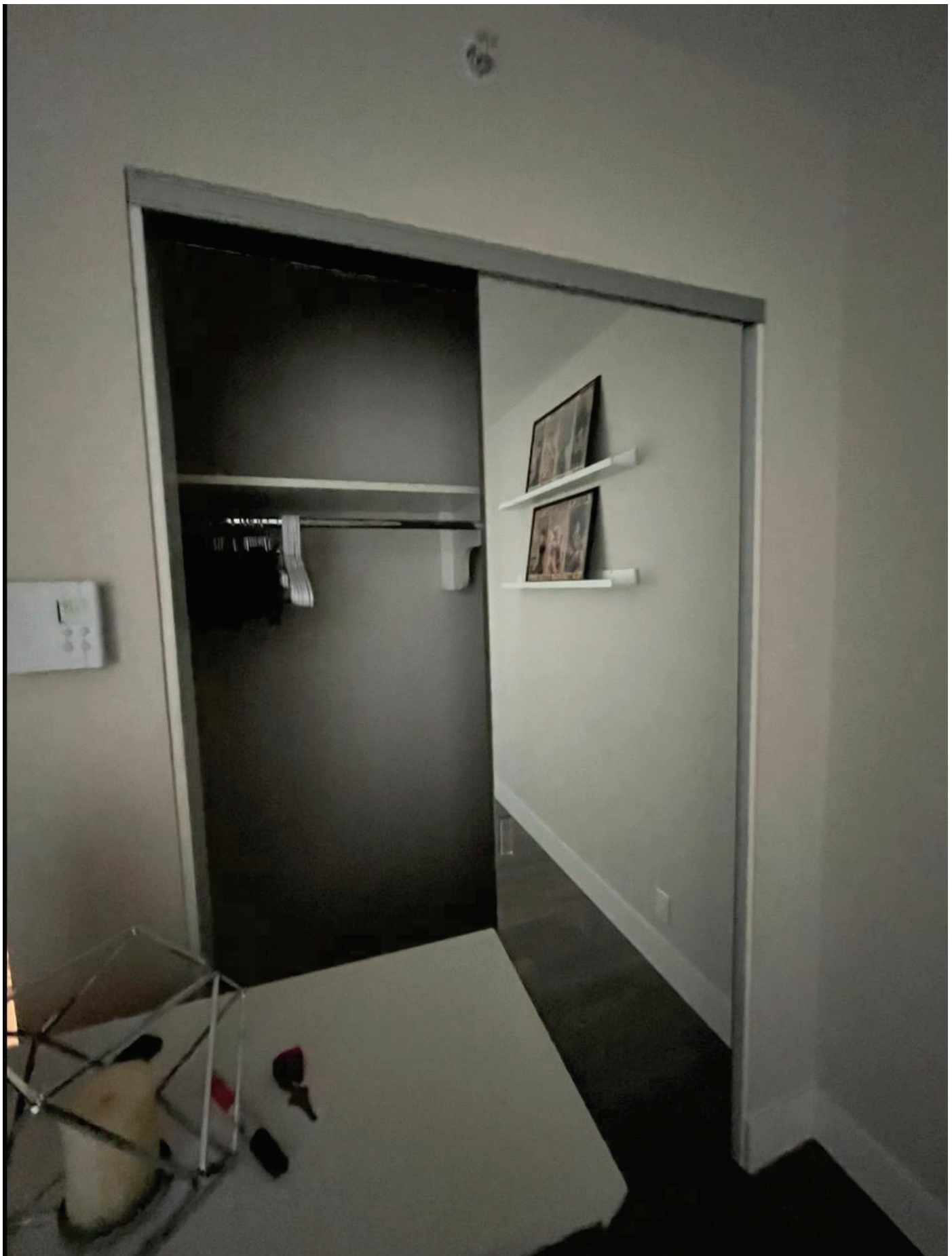
Appendix M

Images: 12- : Second bedroom ('F' on floor plan)



January 30, 2025, Inspection: 402-960 Yates Street





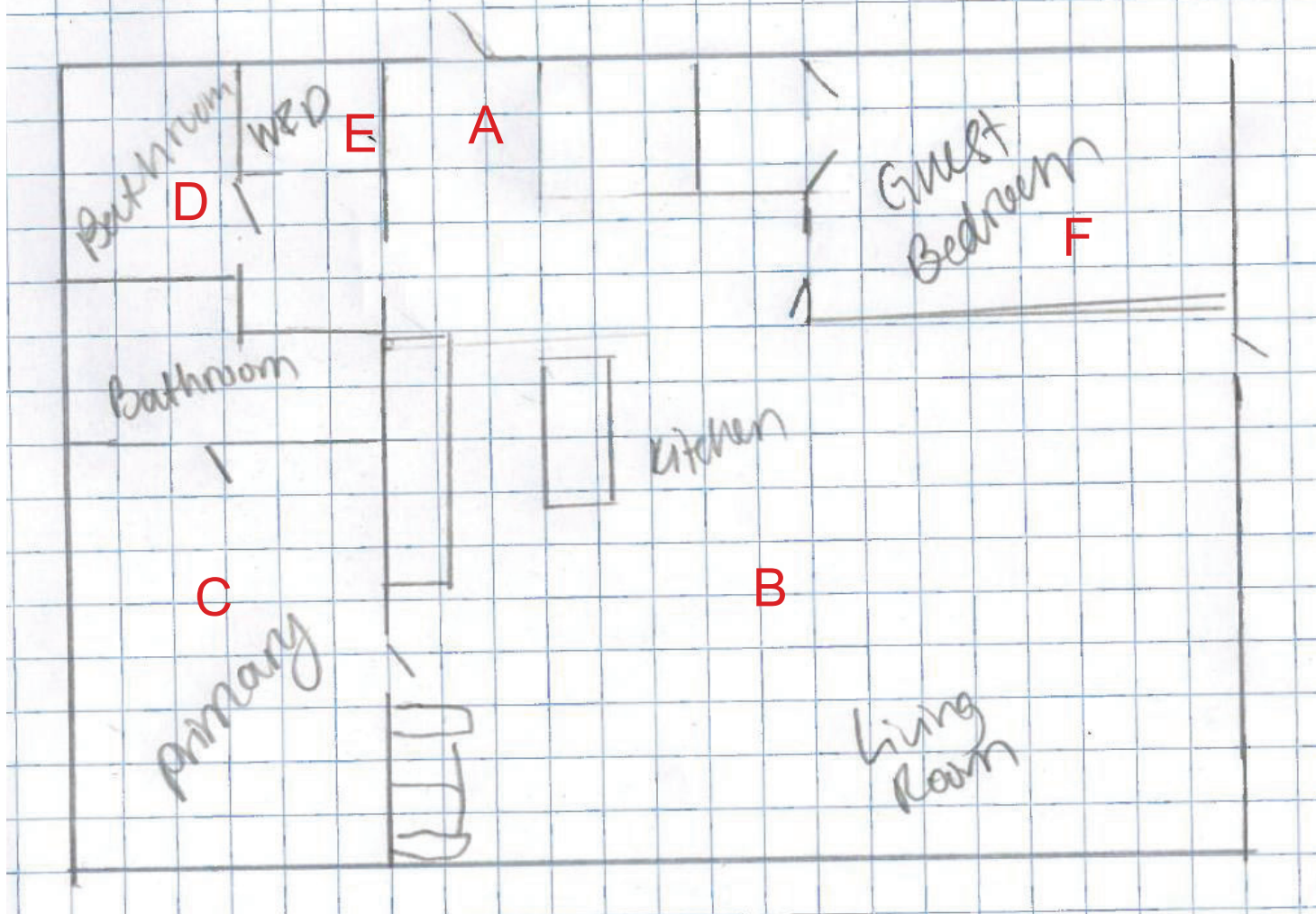


January 30, 2025, Inspection: 402-960 Yates Street



Appendix M

Inspection at 402-960 Yates
conducted 2025-01-30





February 7, 2025

TANYA DODD
402-960 YATES ST
VICTORIA BC V8V 3M3

RE: 402-960 YATES STREET

The City has completed a review of your 2025 short-term rental licence application for the property located at 402-960 Yates Street.

The *Short-Term Rental Regulation Bylaw* states:

(4) The Licence Inspector may refuse to issue a licence for a short-term rental if, in the opinion of the Licence Inspector,

(a) the applicant has failed to comply with section 3; or

(b) the short-term rental operation would contravene a City bylaw or another enactment.

The application has failed to establish 402-960 Yates Street as your principal residence, to the satisfaction of the Licence Inspector. The *Short-Term Rental Regulation Bylaw* states:

(2) A person applying for the issuance of a licence to operate a short-term rental must, in addition to meeting the requirements of the Business Licence Bylaw:

(e) provide, in the form satisfactory to the Licence Inspector, that the premises where the short-term rental will be operated are the operator's principal residence.

Your 2025 application was reviewed on February 6, 2025, including your current advertisement, open-source data, and results of the inspection on January 30, 2025. The review revealed inconsistencies, including few personal effects in the unit upon the January 30, 2025, inspection, that while the property is currently under construction due to flooding, the insurance policy documents reflect the primary use of the property is short-term rentals. As a principal resident short-term rental licence requires the premise to be the operator's principal residence, and the onus falls solely to the applicant to prove eligibility, the licence was denied.

For more information on the *Short-Term Rental Regulation Bylaw* and *Schedule D* and home based business licences, please visit: [SHORT-TERM RENTAL REGULATION BYLAW](#) and [Schedule D.pdf \(victoria.ca\)](#).

Through the regulation requirements for business licensing under the *Community Charter* and the *Short-Term Rental Business Licence Appeal Process Policy*, you may request to have an appeal go before Council. The request to appeal can be made within 30 days of the date on this letter. Should you wish to pursue an appeal, the Licence Inspector report will provide all relevant information and regulations used in decision.

As per policy and procedure, our department does not respond directly to appellants regarding appeals. The appeal process is managed by Legislative Services through the City Clerk's office. All communication is passed through the City Clerk in Legislative Services, they oversee the process and will ensure all necessary information is provided to you.

For any further inquiries regarding an appeal, including acknowledgment of emails and updates, please contact Legislative Services directly at LegislativeServices@victoria.ca.

If you have any questions regarding short-term rentals or business licensing options, please contact our office by phone at 250.361.0726, or by email at str@victoria.ca.

Regards,

Bylaw & Licensing Services
Bylaw Department
City of Victoria
1 Centennial Square, Victoria B.C. V8W 1P6