



CITY OF SAINT PAUL
Christopher B. Coleman, Mayor

*25 West Fourth Street
Saint Paul, MN 55102*

*Telephone: 651-266-6700
Facsimile: 651-266-6549*

Date: June 20, 2017

To: Neighborhood Planning Committee

From: Kady Dadlez, 266-6619

Re: Short Term Rental Zoning Study and Proposed Zoning Code Amendments

Attached are the updated Short Term Rental Zoning Study and Zoning Code Amendments for your review and consideration. Please note that new language in the study and amendments is in red text for easy identification. Profile information from Airbnb about Saint Paul hosts and guests was added. In addition, the proposed amendment was revised to allow two short term rental dwelling units in duplexes in all zoning districts where the use is permitted, not just in one and two-family zoning districts, provided the duplex is owner occupied and the owner is in residence during the stay,.

Attached to the study and proposed amendments are the following:

- Profile information from Airbnb about Saint Paul hosts and guests
- Summary of oral and written testimony. This summary includes a staff response and recommended changes, if any
- Written comments received
- Open Saint Paul responses to the three questions posted

The minutes from the short term rental public hearing on June 2, 2017 will be included in the Planning Commission materials Sonja Butler emails on June 23, 2017.



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Background

What are short term rentals?

One facet of the sharing economy is the online, short term rental of houses, apartments, and condominiums. Continued growth of the sharing economy enabled by technology has led to an increase in websites (host platforms like Airbnb and Expedia) which efficiently enable individuals (hosts) to offer space and for renters to find space. In addition, listings for big events like the Ryder Cup which was recently held in the Twin Cities can be posted on sites like Craig's list months or a year in advance and picked up by a real estate agent that will broker the deal between the owner and renter.

The definition of a short term rental varies by municipality since each chooses to regulate differently. Generally speaking, a short term rental is a dwelling unit, bedroom, or couch rented for a period of less than 30 consecutive days, with or without the owner present. Some jurisdictions use other terms, including vacation rental, timeshare, and tourist rooming house.

Short term rentals in Saint Paul

Short term rentals are occurring in Saint Paul. While there is no official count, there are more than 250 online listings in the City, see attached map. During the recent Ryder Cup event, Airbnb alone reported more than 3,400 guests in the Twin Cities metropolitan area. Ramsey County was home to more than 500 of these.

Under current regulations, short term rentals are not permitted in the City's Zoning Code and there is no licensing requirement. Consequently, existing short term rentals are illegal. Saint Paul is a place of economic vitality and wants to respond to changes in the economy so that innovations are not stifled. The City does not want to pretend that short term rentals are not occurring in the City; it wants to make what is already happening legal and in the process address concerns about health and safety as well as a level playing field.

City Council Adopts Resolution to Study Short Term Rentals

Recognizing the potential impact of short term rentals on neighborhoods, the Saint Paul City Council adopted a resolution asking the Departments of Safety and Inspections (DSI) and Planning and Economic

Development (PED) to study Airbnb and similar companies and how their operations align with current city ordinances, and to evaluate whether current codes ensure that visitors, landlords, Airbnb neighbors, and private property are safe and protected. The resolution also states that departments shall ensure that the appropriate taxes are being collected from these sorts of properties and uses.

Short Term Rental Study and City Council Directive

In July 2016 a Short Term Rental Study prepared by DSI and PED was presented to the Saint Paul City Council. The study looked at existing conditions in Saint Paul, current regulations, current tax collection, potential impacts of short term rentals, and short term rental regulations locally and nationwide. The study also made recommendations and suggested next steps, which the City Council approved. The City Council's recommendations include: 1) develop a zoning code amendment to permit short term rentals and develop standards related to owner occupied and non-owner occupied units; 2) develop an ordinance amendment to fully regulate non-owner occupied units for life safety concerns through the Fire Certificate of Occupancy program; 3) develop a mechanism to ensure tax collection is occurring, possibly via host platforms; 4) develop an ordinance amendment to license host platforms, with specific requirements relating to reporting and compliance; 5) utilize complaints about short term rentals to inform recommendations for future regulations; and 6) educate City staff (police, fire, and inspectors) about the presence of short term rentals in neighborhoods and the potential for complaints.

Potential Impacts of Short Term Rentals

The City of New Orleans issued an exhaustive study on short term rentals in January 2016. This study provides excellent background on the benefits associated with and negative impacts of, short term rentals. These are important for Saint Paul to be aware of as it considers whether and how to regulate short term rentals. The *City of New Orleans Short Term Rental Study* addresses the issues raised in the Saint Paul City Council's resolution requesting this study. The New Orleans study discusses at length the benefits and negative effects associated with short term rentals, as summarized below.

The **benefits** associated with short term rentals:

- Short term rentals are part of the rapidly growing sharing economy
- They provide additional income for hosts and individuals that support short term rentals
- Short term rentals support the tourism economy and provide a significant financial benefit to the region
- There is potential for the City to earn additional income through taxes and fees
- Short term rentals help reduce blight, activate neighborhoods, and support local businesses
- The negative impacts on neighborhood quality of life and affordable housing are over stated as most operators are good managers

The **negative impacts** associated with short term rentals:

- Short term rentals are a commercial encroachment in residential neighborhoods
- Short term rentals reduce neighborhood quality of life due to late night activity, noise, crime, litter, property damage, fire danger, loitering, and reduced on-street parking
- Short term rentals result in a reduction in long-term residents which changes the character of neighborhoods, especially in neighborhoods with the highest concentration of short term rentals
- Short term rentals reduce the number of affordable housing units in a city
- Short term rentals have an unfair competitive advantage from hotels, bed and breakfasts, and legal short term rentals because they are not licensed, do not pay taxes, are not held to the same safety requirements, and have lower capital and operating costs

Short Term Rental Regulations in Minnesota Cities and Beyond

The City of Prior Lake adopted an ordinance in mid-2015, precipitated by complaints from neighbors. The City engaged known short term rental hosts during discussions. They helped shape the regulations and permit process. Those hosts have since received permits from the City. The City is aware of other hosts that have not applied for permits. The City is following up with them. The adopted regulations link the number of parking spaces available to the number of bedrooms that can be rented. The number of guests is governed by the size of the structure and the lot. The ordinance requires there to be an owner or local agent who lives and works within 30 miles of the rental unit and the City's laws related to short term rentals must be disclosed to the guests and posted in the unit. The agent must be available 24 hours a day during the rental period to respond immediately to complaints and the agent's phone number must be provided to the City. The agent must maintain and make available upon request to City staff or law enforcement a list of all current occupants. Disorderly conduct is prohibited on all premises and the ordinance defines and gives examples of disorderly conduct.

The City of Duluth recently adopted an ordinance that provides two options. Those wishing to operate a vacation rental can do so via an interim use permit and those wishing to rent out part of their home can do so with a home share permit. The *interim use permit* regulates the length of stay, number of occupants, number of rooms, off-street parking. A \$650 fee applies. It also requires the permit holder to designate a managing agent who resides within 25 miles of the city to respond 24 hours a day to complaints and the contact information of the managing agent must be provided to all property owners within 100 feet of the property boundary. The permit holder must also post their permit number on all print, poster and web advertisements and also apply for and be granted state and local sales tax numbers. Prior to rental the building must be inspected and a permit issued by the Fire Prevention office. The *home share permit* regulates the length of stay, number of occupants, and owner occupancy. A \$100 fee applies annually. Like the interim use permit, the home share permit holder must also post their permit number on all print, poster, and web advertisements and also apply for and be granted state and local sales tax numbers. Prior to rental the building must be inspected and a permit issued by the Fire Prevention office.

The City of Eagan changed its definition of dwelling unit in November 2015 to prohibit short term rentals of less than 30 days where an owner is not present. An owner can rent out a room in an occupied unit for less than 30 days as long as the owner is present and the guest has full access to the home during the stay. This use is not regulated. Registered accessory dwelling units can be rented for 30 days or more.

The City of Burnsville prohibits short term or vacation rental in residential zoning districts. It recently adopted an ordinance restricting short term or vacation rental in its business licensing section of the City Code (the City Attorney felt that licensing was a more appropriate part of the code to regulate the use than the Zoning Ordinance). Issues identified by the city council are: 1) vacation rentals bring strangers into a neighborhood; 2) people come and go at all times of the day and night; 3) since customers are not residents, they have no interest in maintaining the neighborhood; 4) noise; 5) trash; and 5) transient nature of the operation.

The City of Minneapolis is in the process of developing regulations for short term rentals.

The City of New Orleans Short Term Rental Study from January 2016 includes an assessment of regulations adopted by cities around the United States. While New Orleans is a major tourist destination and has far more short term rental units than Saint Paul, the information gathered in its study from other cities around the country has value and relevance to the conversation in Saint Paul about whether and how to regulate short term rentals. Important findings in the report are noted below.

The *City of New Orleans Short Term Rental Study's* assessment of regulations in other cities identified the components of a short term rental ordinance and discusses each at length. The main take away is that each city regulates differently depending upon the issue it is trying to address, but many cities tend to include most of these items in their regulations. The study also notes that the success experienced by the cities surveyed varied and that the best regulations were adapted over time as issues arose.

- **Definitions** (most are called short term rentals though some use vacation rental, timeshare, or tourist rooming house)
- **Categories** (full dwelling unit rental, single-room rental, or shared-room rental)
- **Size limitations** (number of rooms that can be rented)
- **Concentration** (limits on number of units within a geographic area)
- **Time limitations** (generally less than 30 days, the number of times a unit can be rented per year)
- **Owner occupancy** (whether owner or tenant occupancy is required and for how many days per year the owner must occupy the unit)
- **Use Standards and Guidelines** (no changes to allow a separate entrance, parking, agent contact information, posting of city ordinances, accessible agent to respond quickly to complaints, limiting number of visitors guests may have)
- **Fees** (generally between \$100 and \$150)
- **Notice** (information posted alerting surrounding properties of the use as a short term rental)
- **Taxes** (collection and payment of taxes either by hosting platform or host)
- **Fines and enforcement** (fees should be high enough to deter violations and ordinance should allow for revocation of permit or license for repeated violations)
- **Building code and inspections** (most require at a minimum fire and carbon monoxide detectors, some require inspections, many require permits, licenses, or registrations)

The *City of New Orleans Short Term Rental Study* found that short term rentals are residential uses with commercial type impacts. Generally, short term rentals where the owner or tenant is present are associated with fewer impacts than those where no owner or tenant is present and consequently, tended to be regulated with few restrictions. Short term rentals where the owner or tenant is not present tended to be regulated more strictly because the impacts of their use tended to be more commercial in nature. The City emphasized the importance of having a structure in place to regulate short term rentals to be able to minimize the negative impacts on surrounding properties and facilitate enforcement on problem operators.

Workgroup Considers and Reviews Proposed Short Term Rental Regulations

A workgroup was convened to consider proposed amendments to allow short term rentals. Workgroup participants included host platform representatives from Airbnb and Expedia, owner occupied hosts, non-owner occupied hosts, residents, bed and breakfast hosts, hospitality industry and Visit Saint Paul representatives, a Planning Commission member, and Office of Financial Services staff. The workgroup met on December 7, 2016 and February 7, 2017 to review, discuss, and advise on the proposed amendments.

Listening Session Held on Proposed Short Term Rental Regulations

A listening session was held on January 19, 2017. It was an open dialogue with the community to learn about the pros and cons of short-term rentals in Saint Paul neighborhoods and any looming concerns with how the City proposes to regulate the new use. The listening session summary is attached.

Airbnb Profile of Saint Paul Hosts and Guests

Airbnb provided the following profile information about its hosts and guests in Saint Paul in 2016. The complete overview of Airbnb activity in Saint Paul is attached at the end of this study.

- 200 active hosts
- \$2.5 million total host earnings
- 43 average age of host
- 10,000 guest arrivals
- 4 nights is the average length of stay
- 2.1 average group size of guests
- 51% rent entire home
- 2% rent a shared room
- 296 active listings
- \$7,300 annual earnings of typical host
- 41 average age of guest
- 44,000 Saint Paul residents used Airbnb to travel elsewhere
- 70 Nights hosted annually per typical listing
- 96% of stays involve 4 or fewer guests
- 47 % rent private space in home

How Saint Paul Proposes to Regulate Short Term Rentals

While the City Council believes there is a need to regulate short term rental uses, these uses currently operate throughout the City with relatively few complaints or calls to police. The City plans to regulate short term rentals through licensing, fire certificate of occupancy inspection, and zoning. Regulations are proposed to address life safety and habitability. Experience from other cities suggests that non-owner occupied short term rentals may be more likely to result in negative impacts on the surrounding area than owner occupied rentals. Therefore, to some extent the City intends to regulate short term rentals where the owner is present differently from ones where the owner is not present. Providing a level playing field for bed and breakfast residences and hotels is another factor when considering how to regulate short term rentals. The impact of short term rentals on the availability of affordable housing is something that is of great concern in some cities but not something Saint Paul believes is a cause for concern at this time.

1. Licensing

The City intends to license host platforms that offer booking services such as Airbnb and Expedia as well as individual hosts. Under this model, the platform would be responsible for providing requested data to the City and removing host listings when the platform has been notified the listings are not in compliance with city regulations. Individual short term rental units must: 1) be allowed by zoning; 2) maintain a lodging log; 3) have a current fire certificate of occupancy if a non-owner occupied unit; 4) provide proof of Lodging and Sales tax payment; 5) provide proof of appropriate property insurance; and 6) be licensed by the City.

If a unit is not in compliance with all applicable laws, the platform, upon being notified that the unit is not compliant, would have the responsibility to remove the host unit from its platform. If the host platform fails to comply, adverse action against the platform license could be taken. In addition, the non-compliant individual host could also receive a citation. DSI is in the process of developing licensing requirements for City Council consideration. A modest fee for a license renewed annually would apply.

2. Fire Certificate of Occupancy

Short term rentals are residential uses with commercial type impacts. Generally, short term rentals where the owner or resident occupant is present are associated with fewer impacts than those where no owner or resident occupant is present and consequently may be regulated with few restrictions. Short term rentals where the owner or tenant is not present may be regulated more strictly because the impacts of their use may be more commercial in nature. It is important to have a structure in place to regulate short term rentals to be able to minimize the negative impacts on surrounding properties and facilitate enforcement on problem operators.

Complaints about short term rentals would be handled by DSI in the same manner that property complaints are handled currently. Existing hosts participating in the workgroup sessions emphasized the importance they place on establishing and maintaining a five star rating on host platform websites to generate repeat and future business; they do all they can to be good hosts and good neighbors. For reference, the definition of owner occupied is:

Fire Certificate of Occupancy Sec. 40.03

Owner occupied. Dwellings which are the principal residence of the owner of record of the building and in which the owner resides. "Owner," for the purposes of this definition, means a natural person and does not include a corporation, partnership, or other entity.

Short term rentals are, to some extent, regulated by the fire certificate of occupancy inspection program. The existing fire certificate of occupancy inspection program is sufficient to address life safety and habitability issues of short term rentals. The City currently requires a fire certificate of occupancy for all buildings with three or more units and for all non-owner occupied one and two family dwelling units. Therefore, all short term rental units in non-owner occupied units would fall under the existing fire certificate of occupancy inspection program. Short term rentals in owner occupied or resident occupied units would not require a fire certificate of occupancy. Note that the owner of an owner occupied short term dwelling unit does not need to be present during the rental period, except for duplexes with two short term rental units.

Residential fire certificate of occupancy inspections are done every one to six years depending upon the number and severity of violations found in the most previous full fire certificate of occupancy inspection. Commercial inspections are done based upon the occupancy type ranging from once a year to once every three years. No changes to the fire certification of occupancy program are proposed.

Staff considered requiring individual hosts, as part of the permit process, to designate an individual to act as an agent for the unit and be available to respond to issues 24 hours a day seven days a week, as some cities require. Rather than requiring an agent, Saint Paul opts to obtain contact information for a responsible party in addition to the host as part of the license process but not require the responsible party to be available 24/7.

3. Zoning

The City does not have an ordinance regulating short term rentals and short term rental is not listed as a use permitted in the Zoning Code. Consequently, existing short term rentals are illegal. The proposed zoning amendment makes short term rentals legal and establishes standards and conditions for the use. While there are short term rentals in Saint Paul, they do not generate a lot of complaints or calls for police. Consequently, the proposed amendment seeks to permit the use with a minimum amount of regulation.

Staff considered treating frequently rented units differently from those that are rented only occasionally, including putting a limit on the number of days per month or year that a unit could be rented. However, since host platforms do not share this information for privacy reasons, it is difficult for the City to determine how often a unit is rented. Consequently, this type of regulation creates the need for a much larger regulatory framework than what is proposed, something that is much more involved and costly. Hosts participating in the workgroup were not supportive of a regulation on the number or frequency of rentals.

Staff also considered a provision to require a conditional use permit for non-owner occupied short term rental dwelling units. However, this provision would require a much larger regulatory framework than envisioned under the proposed amendments.

Proposed Amendment – Short Term Rental Dwelling Unit Discussion

The short term rental dwelling unit amendment creates Zoning Code Sec. 65.645 and provides a definition for the use. An off-street parking requirement is also established for the use. Standards and conditions establish a minimum length of stay, prohibit exterior signage in residential districts, and prohibit commercial or social events.

Standards and conditions also limit the number of short term rental dwelling units on a zoning lot to one in one- and two-family residential districts, except that two short term rental dwelling units may be permitted in an owner occupied duplex provided the duplex owner is in residence during the rental period. In other zoning districts one or up to half of dwelling units on a lot, to a maximum of four, may be used for short term rental. More than four short term rental dwelling units may be allowed for buildings with more than ten units when a conditional use permit is obtained by the building owner. The intent is to limit the number of short term rental units in a building to no more than 50 percent to prevent quasi hotels.

Finally, the amendment limits the occupancy of a short term rental dwelling unit to the Zoning Code definition of family, unless a conditional use permit is obtained. This is consistent with the current Zoning Code occupancy limit for a dwelling unit citywide and treats short term rental dwelling units similarly to bed and breakfast residences with one guest room. For reference, the definition of family is:

Zoning Code Section 60.207 – F

Family. One or two persons or parents, with their direct lineal descendants and adopted or legally cared for children (and including the domestic employees thereof) together with not more than two persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of four or fewer persons living in such housekeeping unit shall be considered a separate family for the purpose of this code.

The occupancy of a short term rental dwelling unit that exceeds the definition of a family for large one- and two-family dwellings on large lots would require a conditional use permit from the Planning Commission. Criteria for determining total occupancy in these situations would include the dwelling size, lot size, provision of off-street parking, and fire certificate of occupancy inspection. The reason to require a conditional use permit to allow occupancy to exceed the definition of family is that this is a more commercially intensive use and may be more susceptible to reducing neighborhood quality of life due to late night activity, noise, crime, litter, property damage, fire danger, loitering, and reduced on-street parking.

Why Use the Definition of Family to Determine Occupancy?

The proposed method for determining occupancy of a short term rental dwelling unit is the definition of family. While the definition of family can be confusing, especially for those not accustomed to using and interpreting it regularly, it is the standard method for determining dwelling unit occupancy that the city has used for many years. Determining occupancy of a dwelling unit based on the definition of family applies to many types of housing in the city regardless of the size of the dwelling unit (from one bedroom apartments and condos to starter homes and mansions). It also applies regardless of the length of stay of occupants in a dwelling unit. Thus, it applies equally to long term residents as well as visitors in Saint Paul for a short stay. Through the license process for short term rentals DSI staff will have the opportunity to explain the definition, how to interpret it, and answer questions.

When it comes to determining occupancy of short term rental dwelling units it is logical to treat long and short term rental dwelling units consistently and apply the same method to both. The intent in either case is to limit occupancy to no more than four unrelated adults --- this includes the host if present during the stay. More than four adults are allowed if they meet the definition of family. For example the following would meet definition of family: two grandparents, their two adult children and spouses (spouses representing the other two adults not so related), and four grandchildren. Also, recall that the proposed amendment allows occupancy of short term rental units to exceed the definition of family (more than four unrelated individuals) for large one and two-family dwellings on large lots with a conditional use permit.

While the appeal of a regulation that simply states the total occupancy of a short term rental dwelling unit is clear, its application can be troublesome. For example, one method would be to determine occupancy based on the number of bedrooms in a dwelling unit, say two people per bedroom. However, this would allow the occupancy of a four bedroom house under short term rental regulations to have eight unrelated individuals. This is two times the number of unrelated individuals allowed in a long term residence. The City does not want to allow short term rental uses to be more intense than long term rental uses. The intent of the amendment is to discourage a party house type atmosphere. Generally speaking short term rental uses are more commercial and transient in nature than long term rental uses and should be regulated with more or the same restrictions as long term residences. It does not seem to make sense to allow twice as many people in a short term unit than would be allowed in a long term unit.

Also, under current regulations bed and breakfast residences with two or more guest rooms require a conditional use permit. While the number of guests per guest room is not stated, it is generally assumed to be up to two guests per room.

Finally, to determine occupancy for each licensed short term rental dwelling unit based on the fire and building codes would require a much more extensive regulatory framework than envisioned under the current proposal. Recall that the proposed amendment seeks to regulate short term rental uses with a minimum amount of regulation since they have generated few complaints to date.

The occupancy of a short term rental that exceeds the definition of a family for large one- and two-family dwellings on large lots would require a conditional use permit from the Planning Commission. Neighborhood notification would be required and a public hearing would be held. The Planning Commission may impose such reasonable conditions and limitations in granting an approval as are determined to be necessary to fulfill the spirit and purpose of the zoning code and to protect adjacent properties. The process takes to seven weeks and there is an \$840.00 application fee.

Per Sec. 61.501 of the Zoning Code, in granting a conditional use permit the Planning Commission must find that:

- (a) The extent, location and intensity of the use will be in substantial compliance with the Saint Paul Comprehensive Plan and any applicable subarea plans which were approved by the city council.
- (b) The use will provide adequate ingress and egress to minimize traffic congestion in the public streets.
- (c) The use will not be detrimental to the existing character of the development in the immediate neighborhood or endanger the public health, safety and general welfare.
- (d) The use will not impede the normal and orderly development and improvement of the surrounding property for uses permitted in the district.
- (e) The use shall, in all other respects, conform to the applicable regulations of the district in which it is located.

Questions about what constitutes a family have been raised. The following chart describes various scenarios and provides guidance for determining occupancy. The definition of family is repeated as well for easy reference.

Family. One (1) or two (2) persons or parents, with their direct lineal descendants and adopted or legally cared for children (and including the domestic employees thereof) together with not more than two (2) persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of four (4) or fewer persons living in such housekeeping unit shall be considered a separate family for the purpose of this code.

Determining occupancy of a short term rental dwelling unit (without a conditional use permit):

Host Lives Off Site

4 or fewer unrelated individuals **-or-** 4 adults, 2 of which can include their adult or minor kids

Host Lives On Site

1 adult with no kids **-and-** 3 adults, 2 of which can include their adult or minor kids

1 adult with their adult or minor kids **-and-** 3 adults, 1 of which can include their adult or minor kids

2 adults with no kids **-and-** 2 adults, of which both can include their adult or minor kids

2 adults, 1 of which has their adult or minor kids **-and-** 2 adults, 1 of which can include their adult or minor kids

2 adults, both of which have their adult or minor kids **-and-** 2 adults, no kids

3 adults with no adult or minor kids **-and-** 1 adult, including their adult or minor kids

3 adults, 1 of which has their adult or minor kids **-and-** 1 adult, including their adult or minor kids

3 adults, 2 of which have their adult and minor kids **-and-** 1 adult, with no kids

“Kids” as used above refers to individuals, whether adults or minors, who are lineal descendants and adopted or legally cared for children of the adult (and any domestic employees, like a nanny).

Proposed Amendment - Bed and Breakfast Residence

In addition to the proposed short term rental dwelling unit ordinance, an amendment to the bed and breakfast ordinance Zoning Code Sec. 65.641 is proposed to make the language regarding use of dining and other facilities of a bed and breakfast residence consistent with the language for short term rental dwelling units, which prohibits commercial and social events.

Recommendation for ~~Planning Commission~~ **Neighborhood Planning Committee Action**

The ~~Neighborhood Planning Committee~~ Staff recommends **approval of** that the following proposed amendments to Zoning Code §§ 65.641, 65.645, 66.221, 66.321, 66.421, 66.521, and 63.207. ~~be released for public review and a public hearing set for June 2, 2017.~~

NOTE: Existing language to be deleted is shown by ~~strikeout~~. New language to be added is shown by underlining. [Drafting notes are in brackets.] P refers to permitted uses and C refers to conditional uses. **Language in red is a change from the version released for public review.**

Sec. 65.641. Bed and breakfast residence.

A dwelling unit, located within a one- or two-family dwelling, in which guest rooms are rented on a nightly basis for periods of less than a week and where at least one meal is offered in connection with the provision of sleeping accommodations only.

Standards and conditions in residential and BC community business (converted) districts:

- a. In residential districts, a conditional use permit is required for bed and breakfast residences with two or more guest rooms, and for any bed and breakfast residence located in a two-family dwelling. In RL—R4 residential districts, a bed and breakfast residence may contain no more than one guest room.
- b. The bed and breakfast residence may be established in a one-family detached dwelling or a two-family dwelling, located within a single main building.
- c. The guest rooms shall be contained within the principal structure.
- d. There shall be no more than one person employed by the bed and breakfast residence who is not a resident of the dwelling.
- e. ~~Dining and other facilities shall not be open to the public, but shall be used exclusively by the residents and registered guests.~~ Use of a bed and breakfast residence for any commercial or social event is prohibited.
- f. No additional exterior entrances shall be added to the structure solely for the purpose of serving guest rooms.
- g. The zoning lot shall meet the minimum lot size for the one-family dwelling or two-family dwelling in the district in which it is located, and shall have a minimum size according to the following combination of dwelling units and guest rooms:

Dwelling Units	Guest Rooms	Minimum Lot Size
1	2	6,000
1	3	7,000
1	4	8,000
2	1	6,000
2	2	7,000
2	3	8,000

- h. One-family dwellings may contain no more than four guest rooms. Two-family dwellings may contain no more than three guest rooms.
- i. No bed and breakfast residence containing two through four guest rooms shall be located closer than 1,000 feet to an existing bed and breakfast residence containing two through four guest rooms, measured in a straight line from the zoning lot of an existing bed and breakfast residence.

Sec. 65.645. Short term rental dwelling unit Reserved.

A dwelling unit, or a portion of a dwelling unit, rented for a period of less than thirty (30) days.

Standards and conditions:

- (a) In RL – RT1 districts, there shall be no more than one (1) short term rental dwelling unit on a zoning lot unless a duplex is owner occupied and the owner is in residence during the rental period. In other districts, one (1) or up to 50 percent of dwelling units on a zoning lot, to a maximum of four (4), may be short term rental dwelling units, except that **an owner occupied duplex may have two units provided the owner is in residence during the stay and except that** more than four (4) short term rental dwelling units may be permitted when a conditional use permit is obtained by the building owner for a specific number of short term rental dwelling units.
- (b) No more than one (1) rental of a short term rental dwelling unit shall be permitted per day. Use of a short term rental dwelling unit for any commercial or social events is prohibited.
- (c) No exterior identification sign of any kind shall be permitted in residential districts.
- (d) Total occupancy of a short term rental dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit except that occupancy in excess of the definition of family may be permitted with a conditional use permit, on a case by case basis, for large one- and two-family dwellings on large lots.

Table 66.221 Principal Uses in Residential Districts

Use	RL	R1-R4	RT1	RT2	RM1	RM2	RM3	Definition (d) Standards (s)
Commercial Uses								
<i>Commercial Lodging</i>								
Bed and breakfast residence	P	P	P/C	P/C	P/C	P/C		(d), (s)
<u>Short term rental dwelling unit</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>(d), (s)</u>

Table 66.321 Principal Uses in Traditional Neighborhood Districts

Use	T1	T2	T3	T4	Definition (d) Standards (s)
Commercial Uses					
<i>Commercial Recreation, Entertainment and Lodging</i>					
Reception hall/rental hall		C	C	C	
<u>Short term rental dwelling unit</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>(d), (s)</u>
Theater, assembly hall		C/P <u>P/C</u>	C/P <u>P/C</u>	C/P <u>P/C</u>	(s)

Table 66.421 Principal Uses in Business Districts

Use	OS	B1	BC	B2	B3	B4	B5	Definition (d) Standards (s)
Commercial Uses								
<i>Commercial Recreation, Entertainment and Lodging</i>								
Reception hall/rental hall				P	P	P	P	
<u>Short term rental dwelling unit</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>	<u>(d), (s)</u>
Steam room/bathhouse facility			P	P	P	P	P	(d)

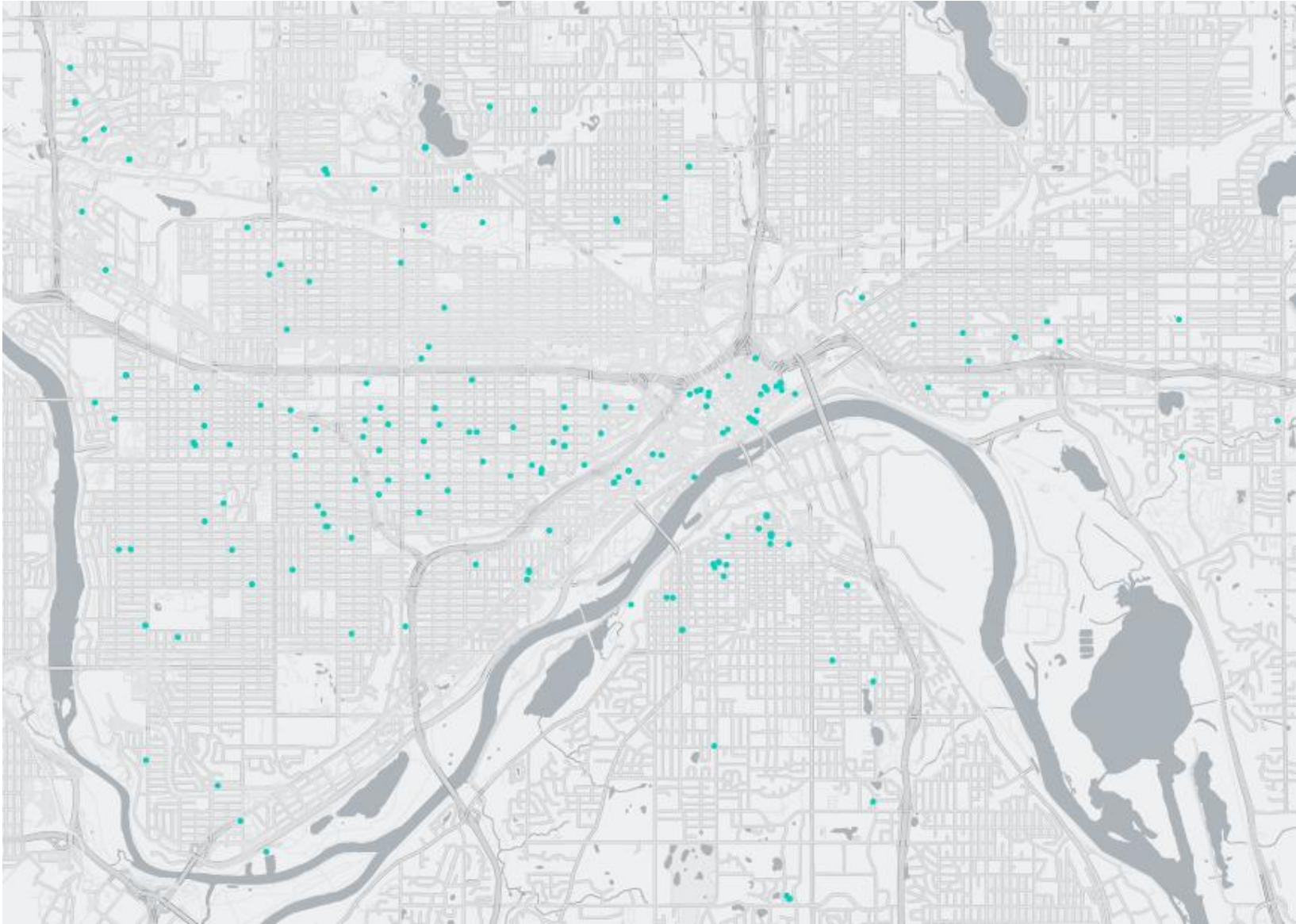
Table 66.521 Principal Uses in Industrial Districts

<i>Use</i>	IT	I1	I2	I3	Definition (d) Standards (s)
Commercial Uses					
<i>Commercial Recreation, Entertainment and Lodging</i>					
Reception hall/rental hall	P	P	C		
<u>Short term rental dwelling unit</u>	<u>P/C</u>	<u>P/C</u>	<u>P/C</u>		<u>(d), (s)</u>
Steam room/bathhouse facility	P	P	P		(d)

Table 63.207 Minimum Required Off-Street Parking By Use

<i>Land Use</i>	Minimum Number of Parking Spaces
Lodging	
Bed and breakfast residence	1 spaces per dwelling unit and 0.5 spaces per guest room
<u>Short term rental dwelling unit</u>	<u>1 space per dwelling unit and 0.5 spaces per every 2 adult guests</u>

Short Term Rental Hosts in Saint Paul – July 2016



To: Dan Niziolek

From: Jerome Benner II

Re: Listening Session for Short-Term Rentals (Airbnb's and VRBO's)

Purpose:

The purpose of this listening session was to create an open dialogue with the community to learn about the benefits of short-term rentals in their respective neighborhoods and any looming concerns with how the City proposes to regulate the new use. Councilmember Prince attended the meeting on behalf of her constituents. The following information are comments collected from the meeting held on January 19, 2017:

Benefits of short-term rentals?

- Building new relationships within the community
- Alternative lodging options for those who do not want to stay in a traditional hotel
- More personal feel. Better for families that are traveling together
- Generates income opportunities for the host(s)
- Builds City's image and generates money for the local economy
- Company for those that are lonely and enjoy having additional guests stay with them
- More eyes on the neighborhood
- Less wear and tear on the homes because guests are staying for shorter periods of them than long-term renters
- Helps with hotel overflow

Issues or concerns with short-term rentals?

- Safety issues – people have died at Airbnb's (Airbnb now supplies Co2 and smoke detectors)
- No notice to residents. Many felt they do not have a say in what goes on in their neighborhoods
- Fear of not knowing who is staying next door (stranger danger!)
- Creating economic/commercial uses in predominately residentially zoning areas
- Hosts discriminating against guests
- Despite being a good host, residents are concerned bad guest will still be an issue
- Traffic congestion on local street systems
- Clarity in ordinance
- Unsavory entrepreneur host platforms

Ways to ensure short-term rentals are a beneficial part of neighborhoods?

- De-regulate traditional bed and breakfast uses to make it easier for business owners
- Require inspections of all short-term rentals
- Platform to allow residents to submit complaints regarding the improper use of a short-term rental
- Education hosts and potential guests about short-term rentals prior to their stay
- Database to collect ID from residents
- Separation requirement to help mitigate impact on neighborhoods
- State-Sponsored listing site
- Host pays inspection fees
- Create off-street parking requirements for hosts
- Require a Conditional Use Permit for all short-term rentals

Number of Short Term Dwelling Units Permitted



Single family home
1 short term rental dwelling unit permitted



Duplex
Non-owner occupied
1 short term rental dwelling unit permitted
Owner occupied – and owner present
2 short term rental dwelling units permitted



Three unit building (triplex)
1 short term rental dwelling unit permitted



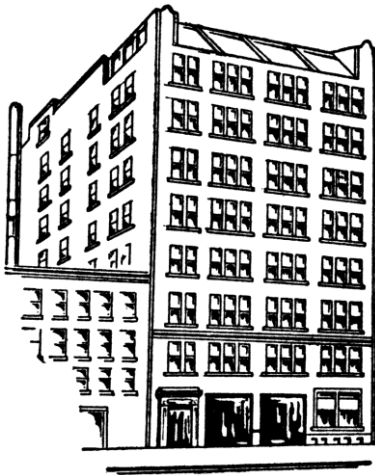
Four unit building
2 short term rental dwelling units permitted



Six unit building
3 short term rental dwelling units permitted



Eight unit building
4 short term rental dwelling units permitted



Larger apartment/condo building*
4 short term rental dwelling units permitted

*The number of short term rental dwelling units may exceed 4 if a building owner obtains a conditional use permit for a larger number of units.

The occupancy of any short term rental dwelling unit is limited by the zoning code definition of family. This occupancy can be exceeded with a conditional use permit, on a case by case basis, for large one and two-family dwellings on large lots.

Family - One or two persons or parents, with their direct lineal descendants and adopted or legally cared for children (and including the domestic employees thereof) together with not more than two persons not so related, living together in the whole or part of a dwelling comprising a single housekeeping unit. Every additional group of four or fewer persons living in such housekeeping unit shall be considered a separate family for the purpose of this code.

“Children” refers to individuals, whether adults or minors, who are lineal descendants and adopted or legally cared for children of the adult (and any domestic employees, like a nanny).

Overview of the Airbnb community in :

Saint Paul, Minnesota, United States

Chose an aggregation level

- city
- state
- country

Pick an area

Saint Paul, Minnesota, United States

Pick a date

- 2015 (calendar year)
- 2016 (calendar year)
- May 1, 2017

All Definitions

Annual Earnings (Typical Host)	Median value of total income earned by host during the one-year study period. Annual earnings are presented for typical hosts.
Average Length of Stay	The average length of stay per guest, rather than per trip.
Guest	Airbnb community members who stay in Airbnb listings.
Host	Airbnb community members who rent space on Airbnb.
Inbound Guest	All guests visiting a particular location. Inbound guests includes guests who live in the same location they may have stayed in.
Listing (Active)	A property listed on Airbnb. Listings may include entire homes or apartments, private rooms or shared spaces. Active Listings are all listings that appear on the website during a search. Active listings do not necessarily have availability on a particular date or at all.
Entire Home / Apartment Listing	A listing where the guest can rent the entire home from the host. The host is not present in the home during the guest's stay.
Private Room Listing	A listing where the guest can rent a private bedroom within a home. The host may be present in other parts of the home during the guest's stay, and the guest may share common spaces like the kitchen, living room, and/or a bathroom with the host.
Shared Room Listing	A listing where the guest can rent a communal space, such as a shared bedroom or a living room sofa bed, within a home. The host may be present in the home during the guest's stay, and the guest may share common spaces like the kitchen and/or a bathroom with the host.
Nights Hosted (By Listing)	Total number of nights a given listing is rented through Airbnb in the study period. Only listings that were active as of the start of the study period, and had at least one booking during the study period are included, in order to present the most representative annual values for Airbnb hosting activity.
Outbound Guest	All guests from a particular location who booked an Airbnb listing, regardless of where the listing is. There may be some minor overlap between Inbound Guests and Outbound Guests. All guests associated with a particular reservation are attributed to the location of the booking guest.
Typical Host	The median host for all hosts who had at least one active listing as of the start of the study period and at least one booking during the study period. Typical host definitions are used to calculate Annual Earnings and Nights Hosted. Presenting the median value for all hosts who were active as of the start of the study period provides the most representative values for the Airbnb host community.

Overview of the Airbnb Community in Saint Paul, Minnesota, United States

The following page captures the Airbnb community in Saint Paul, Minnesota, United States

HOSTS

CURRENT ACTIVE HOSTS
as of 2016 (calendar year)

200

AVERAGE HOST AGE

43

ANNUAL EARNINGS FOR A
TYPICAL HOST

\$7,300

GUESTS

INBOUND GUEST ARRIVALS IN
THE PAST YEAR

10,000

AVERAGE LENGTH OF STAY
PER GUEST

4

OUTBOUND GUEST ARRIVALS
IN THE PAST YEAR

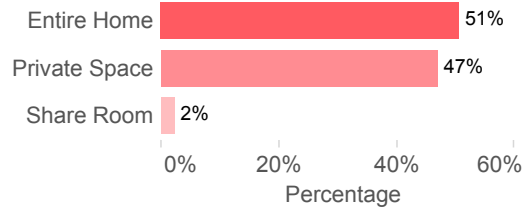
44,000

LISTINGS

NIGHTS HOSTED PER YEAR
FOR A TYPICAL LISTING

70

CURRENTLY ACTIVE LISTINGS BY TYPE



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Overview of the Airbnb Community in Saint Paul, Minnesota, United States

The following page captures the Airbnb community in Saint Paul, Minnesota, United States

HOSTS

AVERAGE HOST AGE

43

ANNUAL EARNINGS FOR A TYPICAL HOST

\$7,300

GUESTS

INBOUND GUEST ARRIVALS IN THE PAST YEAR

10,000

AVERAGE LENGTH OF STAY PER GUEST

4

OUTBOUND GUEST ARRIVALS IN THE PAST YEAR

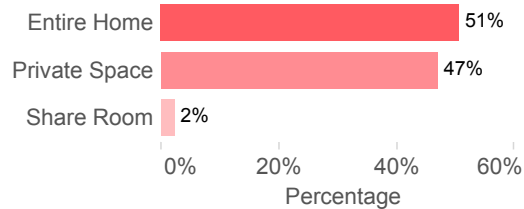
44,000

LISTINGS

ACTIVE LISTINGS

296.0

CURRENTLY ACTIVE LISTINGS BY TYPE



NIGHTS HOSTED PER YEAR FOR A TYPICAL LISTING

70

Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017

Airbnb Host and Guest Profile

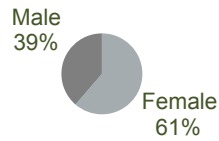
Airbnb hosts in Saint Paul, Minnesota, United States are respectful community members who enjoy sharing their homes with guests from all over the world.

HOST PROFILE

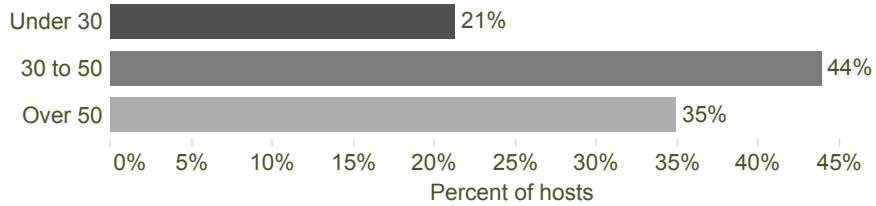
AVERAGE HOST AGE

43

GENDER BREAKDOWN



AGE BREAKDOWN



GUEST PROFI..

AVERAGE GROUP SIZE

2.1 people

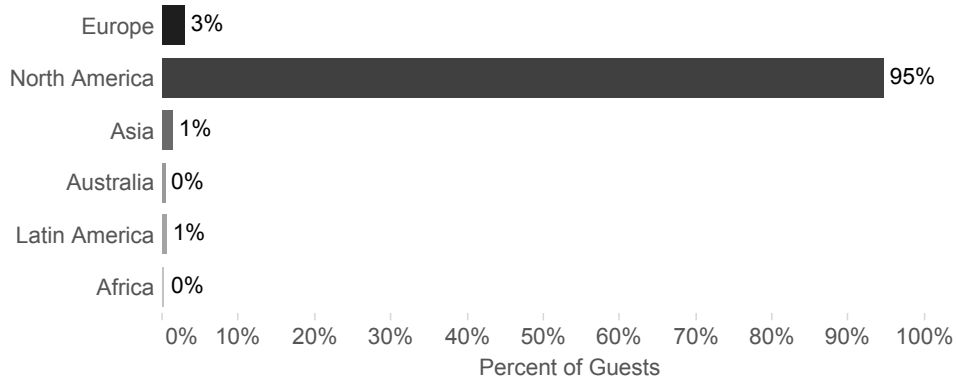
PERCENTAGE OF TRIPS THAT INVOLVE 4 OR FEWER GUESTS

96%

AVERAGE AGE OF BOOKING GUESTS

41

GUEST ORIGIN



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Hosting Behavior

For many hosts in Saint Paul, Minnesota, United States, home sharing is an economic lifeline that makes it possible for residents to pay the bills, make ends meet, and stay in the cities they love. Hosts tend to host occasionally throughout the year, and earn modest but significant supplemental income.

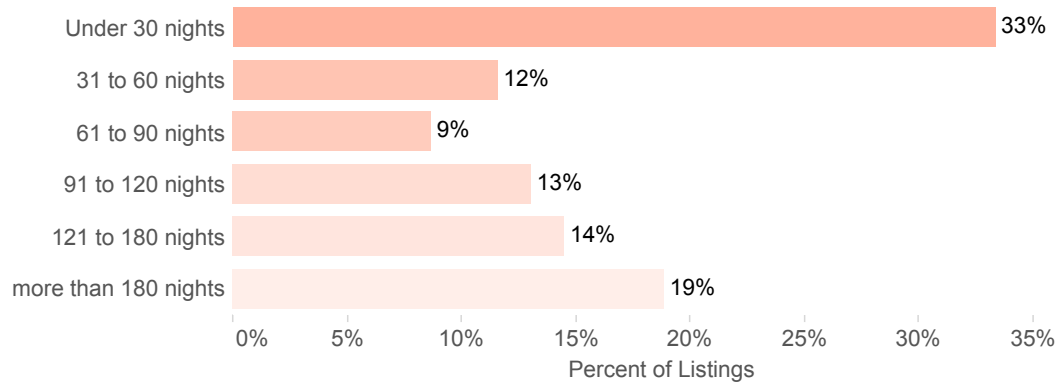
NIGHTS HOSTED PER YEAR
BY A TYPICAL HOST

70

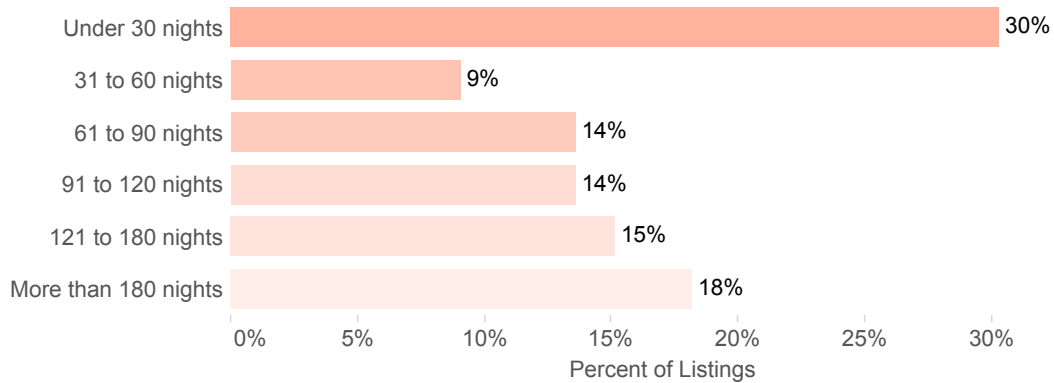
ANNUAL EARNINGS FOR A
TYPICAL HOST

\$7,300

NIGHTS HOSTED PER LISTING - ALL LISTINGS



NIGHTS HOSTED PER LISTING - ENTIRE HOME LISTINGS



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Geographic Distribution of Listings

The following page the geographic distribution of active listings in Saint Paul, Minnesota, United States

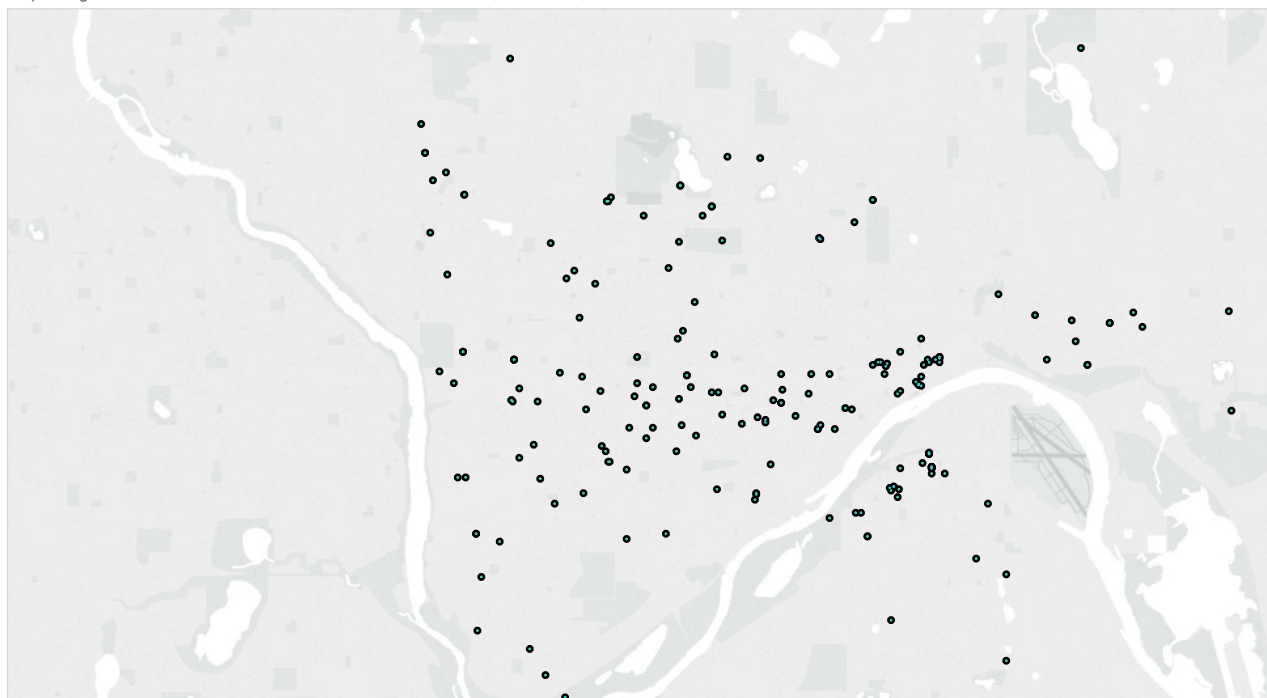
Aggregation Level

- city
- state
- country

Pick an area

Saint Paul, Minnesota, United States

Map listings that were booked in the last 12 months in Saint Paul, Minnesota, United States



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Short Term Rental Zoning Study and Zoning Amendments

Public Hearing Testimony Summary

- 15 people spoke and 16 written comments were received -

1. ZONING ISSUES SUMMARY

A. Definition of Family

Use of “family” to describe occupancy is a departure from guest/tourist/traveler/transient. It is cumbersome, complicated, and unenforceable and will lead to low compliance. Instead, establish a maximum number of guests, maximum number of rooms, or square footage amount to regulate occupancy.

Staff response: As noted in the study, long and short term rental units are being treated equally and consistently by using the definition of family to limit occupancy of both uses regardless of the size of the dwelling unit. A limit of four guests could be imposed but then a family with two parents and more than two children would not be able to stay in a short term rental dwelling unit in Saint Paul. A regulation based on number of guest rooms could potentially allow greater occupancy for a short term rental than a long term rental and staff does not want to allow short term rental uses to be more intense than long term rental uses. Regulation based on square footage would require a larger regulatory framework than proposed and would be more cumbersome and costly to administer.

Profile information for Saint Paul from Airbnb states that the average group size using its platform is 2.1 people.

Staff suggested change: None.

B. Multiple Units for a Single Owner

Prevent large investor groups from owning many short term rental units in a building or neighborhood. Specifically prevent a multi-unit building from becoming a quasi-hotel.

Eliminate the 50 percent rule for multi-unit buildings. Do not regulate by building type but by the number of licenses a host can hold. Limit the number of licenses a short term rental host can hold to four.

Staff response: The proposed ordinance would prevent more than four units in a multi-unit building to prevent a quasi-hotel. More than four units would require a conditional use permit. The proposed ordinance would not prevent large investor groups or even individuals from operating multiple units in a neighborhood.

The idea of limiting the number of licenses an individual can hold was considered before the proposed ordinance was drafted. A limit on the number of licenses allowed could limit economic opportunity for some. On the other hand, no limit could allow an individual or large investor to convert many units in a neighborhood from long to short term rental. This could result in an impact to availability and affordability of housing. While this may be a possibility, the market does not seem to suggest it.

Staff suggested change: None.

C. Signage

Allow signage in residential districts the way that bed and breakfasts are allowed to have signage.

Staff response: There was only one comment about allowing signage for short term rentals. It did not seem to be a concern for most. Prohibiting signage helps to limit the commercial encroachment in residential areas.

Staff suggested change: None.

D. Parking

The proposed parking requirements are too restrictive since many guests fly into Saint Paul and take transit or a taxi. Many guests have a single car or no car at all. The need for parking for short term rental dwelling units may be less than what is needed for long term rentals.

Staff response: The proposed ordinance calls for 1 space per dwelling unit and 0.5 spaces per every 2 adult guests. The Airbnb profile information suggests the average group size is 2.1 people. This would not require an additional parking space since 1.5 spaces is rounded down to 1 space. Three or more adult guests would require an additional space. The proposed parking requirement seems appropriate and not onerous.

Staff suggested change: None.

E. Limit on Number of Units Allowed

If 50 percent of units in a multi-unit building can be short term rental, how would that work with buildings with an odd number of units? At least two short term rental dwelling units should be allowed in a triplex. Duplexes and triplexes are by their nature commercial businesses, the only difference between them and short term rentals is the length of stay. Short term rentals are no more commercial in nature than long term rentals. Do not limit the number of short term rental dwelling units in a four unit building to two; allow up to four short term rental units. The city runs the risk of overregulating in anticipation of adverse outcomes which may or may not occur.

Staff response: The number of short term rental units allowed in a multi-unit building with an odd number of units would be rounded down. For example, a triplex would be allowed one short term rental unit and a five unit building would be allowed two short term rental units. The state definitions of

hotel and motel are unclear. Without a limitation on the number of units we could end up with a hotel. This may be detrimental in a residential setting.

It can be difficult for neighbors to develop a sense of community with properties used exclusively as short term rentals. Without the monitoring an owner-occupant provides parking, noise, and disrespectful behavior may become potential issues for a neighborhood.

The Zoning Administrator in the Department of Safety and Inspections pointed out that the ordinance language does not contemplate a situation in which a duplex is located in a zone other than R1 through RT1. The way the ordinance language reads as proposed, a duplex in an RT1 zone or higher would be limited to only one short term rental dwelling unit (no more than 50 percent of units). The Zoning Administrator recommended revising the language to treat duplexes similarly regardless of the zoning district in which they located: allow both units of an owner-occupied duplex to be short term rental provided the owner is in residence during the guest stay.

Staff suggested change: Allow both units of an owner-occupied duplex in any zone to be short term rental provided the owner is in residence during the guest stay.

F. Bed and Breakfast Regulations

Keep current laws as they are and require a bed and breakfast license, perhaps eliminating the need to serve breakfast as a requirement. Current law allows a bed and breakfast with one guest room with a license, no conditional use permit required. A bed and breakfast with more than one guest room requires a license and conditional use permit. Grandfather in existing bed and breakfast residences and allow more guest rooms and guests, and remove the limit on number of employees allowed.

Staff response: The short term rental model is different from a bed and breakfast and a new ordinance is needed to define and regulate the use. While a bed and breakfast owner typically lives on site and offers rooms for guests, short term rentals can involve house sharing or exclusive use of a residence. No meals are offered in conjunction with a short term rental stay.

It does not seem appropriate to allow bed and breakfast residences to have more guest rooms or guests than what was approved as part of their conditional use permits. The proposed ordinance limits occupancy of a short term rental dwelling unit to 4 or fewer individuals or a group that meets the definition of family. This includes the unit's residents if they are present during the stay. A conditional use permit would allow greater occupancy, similar to a bed and breakfast.

If a bed and breakfast operator wishes to have more than one employee, they can request a modification of this condition of the permit from the Planning Commission and provide a justification for the modification based on unique circumstances.

Staff suggested change: None.

G. Heritage Preservation Commission Involvement

Involve the Heritage Preservation Commission in the conditional use permit process for short term rental dwelling units.

Staff response: The Heritage Preservation Commission reviews exterior changes in historic districts and to designated structures. It does not consider use of the structure or property. It is possible that a change in use could trigger the need for exterior changes. If that is the case an application for review would be required, but the use itself is not relevant to the review of exterior changes.

Staff suggested change: None.

H. Commercial Encroachment and Rezoning

A short term rental dwelling unit is a business in a residence.

Staff response: Short term rental uses are residential uses with commercial impacts.

There seemed to be a misunderstanding expressed in oral and written testimony about the proposed ordinance. Commenters stated that the proposed ordinance would change the zoning of property from residential to commercial. This is not the case. The residential use (short term rental) would be allowed in residential and commercial zoning districts but there is no intent to change the zoning of property from residential to commercial.

Staff suggested change: None.

2. TAXES SUMMARY

There was agreement that taxes should be paid by hosts. Licensing regulations should require tax collection via host platforms for online bookings and collection from hosts for bookings made directly with hosts.

Staff Response: Staff agrees that taxes should be collected from both host platforms when there is an arrangement to do so and directly from hosts when there is no such arrangement and guests book directly with hosts. This is a matter for the licensing component of regulation and not for the zoning component. Thus no change is suggested.

Staff suggested change: None.

3. COMPLAINTS AND ENFORCEMENT SUMMARY

The ability to enforce regulations, especially on weekends was expressed (noise, crime, litter, property damage, fire, loitering, parking). Concern about the costs of enforcement was also noted. Neighbors should not have to be responsible for making complaints to get compliance from hosts.

Airbnb is open to creating a voluntary process with the city to remove problem hosts after appropriate notification and consideration.

Safety and security for guests and residents in surrounding neighborhoods is a concern, especially for residents of multi-unit buildings.

Staff Response: The study noted that education is part of the process of regulating the new use. City staff including police, fire, and inspectors will be informed about the presence of the use in neighborhoods and the potential for complaints. Enforcement is done on a complaint basis so neighborhood involvement is critical in bringing problems to the attention of city staff. Residents are encouraged to make complaints when issues arise. Complaints will be investigated and appropriate action taken to protect the health, safety, and general welfare of residents and neighborhoods. The proposed zoning ordinance provides standards and conditions for the use. The proposed license provides for a civil remedy for hosts who fail to comply with regulations.

The minimal regulation proposed should help to limit the cost to administer and enforce the regulations.

Airbnb's A Resource for Neighbors includes the following:

Anyone can go to [Airbnb.com/neighbors](https://www.airbnb.com/neighbors) to share specific concerns they might have about a listing in their community. These concerns could include things like noise complaints. From there our team will review their concern and, if necessary, follow up with the host regarding the issue.

Neighbors can submit information without having their name disclosed to a host or allow our team to pass along their contact information so the host can follow up with them directly. Once a neighbor submits feedback, we will send a confirmation email, along with a case number.

We'll treat each case seriously and ensure that we give hosts and their neighbors the opportunity to resolve concerns themselves, whenever possible. Hosting is a big responsibility and those who repeatedly fail to meet our standards and expectations will be subject to suspension or removal from the Airbnb community.

Note that Airbnb is one of many online hosting platforms. The policy above applies only to Airbnb hosts.

Regarding safety and security in multi-unit buildings, it is up to building owners to establish rules appropriate to each situation, whether and how to allow the use or prohibit it altogether.

Staff suggested change: None.

4. SUPPLEMENTAL INCOME SUMMARY

Many testifying and submitting written testimony expressed the benefits of the supplemental income that comes from short term rental units. The added income helps with affordability, taxes, and insurance as well as allowing residents to maintain, improve, and invest in their properties.

Hosts note that short term rental guests cause less wear and tear than even the most well-meaning long term residents.

Staff Response: These are important reasons to make the use legal and establish regulations to protect the health, safety, and general welfare.

Staff suggested change: None

5. LICENSING SUMMARY

Licensing the platforms violates federal law.

Skepticism was expressed about the city's ability to license the platforms and get the necessary information from platforms to ensure compliance and enforce regulations.

Unrealistic that the city will be able to license all platforms.

Amend certificate of occupancy inspection process to include a category/tier for short term rentals the same way that long term rental is a category/tier. Require host attendance at a Short Term Rental 101 course as part of license requirement.

Support for licensing hosts and platforms.

Staff response: Online platforms argue that licensing platforms violate federal law. The Department of Safety and Inspections staff are working with city attorneys to ensure that the City's proposed law is permitted under federal law. This is a matter for the licensing component of regulation and not for the zoning component. Thus no change is suggested.

Staff suggested change: None.

6. NEIGHBORHOOD LIVABILITY

Allow short term rental dwelling units but preserve the residential character of neighborhoods through regulation. Short term rental dwelling units are a commercial encroachment/business in residential units and often residential neighborhoods.

Guests in short term rental dwelling units support tourism and local businesses and promote the city.

Staff response: The intent of the proposed ordinance is to permit the use but with limitations to preserve the residential character of neighborhoods. For example, limits on occupancy, prohibiting social or commercial events, and requiring off-street parking are measures aimed at limiting the impact of the use.

Staff suggested change: None.

7. HOUSING AVAILABILITY AND AFFORDABILITY SUMMARY

Loss of housing affordability and long term rental units to short term rental are concerns that are not addressed by the study or regulations. Should the conversion of long term to short term units be tracked to assess the impact to availability and affordability of housing?

Staff response: Maintaining housing availability and affordability are important for Saint Paul. We know from testimony and information from hosts that some units in the city have been converted to short term rental from long term rental. The proposed ordinance limits the number of units in multi-unit buildings to prevent conversions to quasi-hotels. Tourist-driven cities like New York, San Francisco, and New Orleans with very expensive housing markets have seen losses in housing availability and affordability as a result of conversions to short term rentals. Housing in Saint Paul is more affordable than in these cities and the year round tourism demand pressuring conversions to short term rentals is not so great. So, while availability and affordability are concerns for Saint Paul, the market here is different from other cities and the pressure to convert less strong at this time. Department of Safety and Inspections staff will track and monitor this with data and information from the online platforms.

Staff suggested change: None.

Open Saint Paul: *A Sampling of Responses to the three questions*

What do you see as the benefits of short term rentals?

- Tourism, community and business support, property values increase with awareness and sharing of hip places, affordable travel options, people connecting.
- Hotels are cost-prohibitive.
- Money to keep up property.
- A way for families to make extra money to cover the cost of living and high property taxes.

What issues or concerns do you have with short term rentals?

- People with multiple locations renting only for profit are a concern.
- Commercial short-term rentals that are not owner occupied are a problem. Without the monitoring an owner/occupant provides parking, noise, and disrespectful behavior becomes a potential issue for the neighborhood.
- Guests are on vacation and want to have a good time but the neighboring houses are filled with people that need to sleep and go to work and school the next day. Lack of on street parking is a concern. We all expect our neighbors to have parties occasionally and understand that parking won't be easy on that day, but to consistently have trouble would negatively impact our neighborhood.
- I think the use of the property is very different depending upon the length of time the property is rented.
- Non-resident short term rentals are no more than hotels and should be governed as such.
- If properties are used exclusively as short term rentals it is difficult for neighbors to develop community with those at that property. And not all short term rental hosts and guests are equal in quality and concern for community.

What are ways to ensure that short term rentals benefit neighborhoods?

- Protections and recourse for the renter would be helpful.
- Having high standards on properties and owners can ensure good renters who bring tourist dollars to neighborhoods.
- House rules that respect neighbors.
- Ensuring that the owners of the properties maintain the properties and renters are respectful of the surrounding neighbors.
- We want to encourage homeowners who open their homes out of adventure, curiosity, love of travel and people, and their community to still participate in Airbnb but permit or tax those who are just in it for sole income or rental property.



UNION PARK DISTRICT COUNCIL

161 Snelling Avenue North, Saint Paul, MN 55104

651.645.6887 | info@unionparkdc.org | www.unionparkdc.org

An Affirmative Action, Equal Opportunity Employer

May 16, 2017

Dan Niziolek
Department of Safety and Inspections
City of Saint Paul
375 Jackson Street
Saint Paul, MN 55101

Dear Dan,

Thank you for presenting at the May 15, 2017, meeting of the Union Park District Council Committee on Land Use and Economic Development.

The Committee voted unanimously to support the proposed ordinance amendments related to Short Term Rentals, and to support the City's process moving forward to implement the ordinance amendments.

Please let me know if you have any questions.

Sincerely,

Julie Reiter, Executive Director, Union Park District Council

Dadlez, Kady (CI-StPaul)

From: MARY ANTONIA WILMES <mary@sagewoman.net>
Sent: Wednesday, May 31, 2017 8:49 PM
To: Dadlez, Kady (CI-StPaul)
Subject: Airbnb Study

Hi, I have a single Airbnb unit in my home. I read the study carefully and think the proposal is very reasonable. My only question, a minor one, is why if the B&Bs want Airbnbs treated the same as them, and that seems to be mostly the case, why can B&B's have an exterior sign but Airbnbs can't? I plan to come to the meeting on Friday. Thanks.

Mary Antonia Wilmes
1393 Berkeley Av
Saint Paul MN 55105
651-698-0301

Summit Hill Association

District 16 Planning Council
860 Saint Clair Avenue
Saint Paul, Minnesota 55105
Telephone 651-222-1222
www.summithillassociation.org
info@summithillassociation.org

June 1, 2017

Kady Dadlez
Senior City Planner
St. Paul Department of Planning and Economic Development
25 West 4th Street
St. Paul, MN 55102

Sent Via Email

Dear Kady;

On behalf of the Summit Hill Association and its Zoning and Land Use Committee, I'm sending comments regarding the proposed Short-Term Rental (STR) zoning code amendments for consideration at tomorrow's Planning Commission public hearing and meeting.

We elected not to take a vote on this, acknowledging that there is a need to regulate STRs. However, we solicited comments from our board and from the broader neighborhood and they are consolidated and reflected in the accompanying document "Short-Term Rentals: Comments, Questions and Concerns" which includes general comments, as well as some specific to the points and suggestions in the Planning Commission document dated 4/14/17 outlining the findings of the STR study that was conducted and the proposed zoning code amendments.

Themes which emerged centered on the following:

- Concerns about safety and security that are not addressed in the proposed amendments, especially for residents of multi-family buildings who could see a succession of strangers having access to and occupying units in their buildings, but also for surrounding neighborhoods of STR units in general.
- Concerns about losing affordable, long-term rental units to STRs, based upon the experiences of other cities.
- Skepticism on the reliance on the various STR platforms for enforcement and providing the necessary data to provide adequate regulation by the City.
- How compliance can really be monitored and enforced by the City, whether it's with regard to fire inspections, licensing or other matters.
- Concern that the proposed rules around occupancy and limits on the number of allowed STR units are too expansive, along with more questions on who and how these would be enforced.

Please let me know if you have any questions, and thank you again for consideration of our comments.

Yours truly,

Lori Brostrom
Chair, Zoning and Land Use Committee
Summit Hill Association District 16 Planning Council

cc: Monica Haas, SHA Executive Director

SUMMIT HILL ASSOCIATION NEIGHBORHOOD INPUT

Short-Term Rentals: Comments, Questions and Concerns

General:

- On Page 2, there was a list of potential negative impacts of STRs and the proposed ordinances did not address several:
 - Neighborhood quality of life issues such as late night activity, noise, crime, litter, property damage, fire danger, loitering, reduced on-street parking
 - Reduction in long-term residents and affordable housing as STRs reduce the number of units which would otherwise be rented for longer-term residential uses
- What are the protections for other residents in multi-family buildings when there are problems or security issues, especially when the landlord/owner is not on site? How do they have a voice about strangers constantly having access to the building when moving in this tight rental market is not a practical/viable option?
- The proposed regulations do not seem to address/solve the identified potential problems. That being said, I would prefer the City err on the side of less regulation, knowing that more can be added. The benefits seem more than potential. To homeowners and property owners—providing extra income that is likely to be invested in St. Paul, used to keep up properties or just help pay their property tax bill. The argument of benefits to neighborhood businesses is compelling, as visitors are more likely to spend their money near where they are staying.
- I have a concern with safety for non-owner occupied premises. For multi-family buildings, I have a particular concern about safety and security for the other residents. Also, I believe that non-owner occupied short term rentals have the potential to negatively impact the housing market for affordable housing. I believe that apartment prices in NYC and San Francisco have risen as there are fewer long term rentals on the market due to apartment stock being used for short term rentals.
- With all the benefits in terms of income streams for homeowners and local businesses, which is great, the potential issues to avoid or keep on radar are:
 - Purchasing homes and buildings for STR only. Would it be possible to put a limit on the number of units one Airbnb operator can offer? From a recent report on PBS about NYC cracking down on Airbnb, in NYC, 6% of hosts account for 37% of units according to an Atty General Report. At what point are these units B&Bs or hotels?
 - In NYC 4600 units rented longer than 3 months per year.
 - Housing issue significantly less of a problem in St. Paul; is there a need to track lack of housing with the increase of STR available in the city? At a designated ratio, cap number of STR offered? If go over a certain number, owners jump into the B&B or hotel category.
- I've looked at several studies on short-term and Airbnb from other cities—including NY, Madison, WI., and others. The costs and benefits to a city are clear. Cities will incur more costs, while some individual owners will incur more benefits.
 - The argument that St. Paul needs to keep up with economic trends, referencing short-term rentals, is not supportable by any known data. The numbers are just not there. Notwithstanding the "fees" collected, in fact, the city will increase its expenses because of inspections, trash and other clean-up, and calls to police, among other things. It is simply not true that a city will see an economic benefit from short-term rentals. The costs, however, go beyond (opportunity cost) direct costs for inspections, etc. to other things that will be neglected because of this issue. My sense is that St. Paul is already at

the margins of its capacity to provide for a well-regulated police, quality infrastructure, and development of city-wide-benefiting projects.

- Given the image that St. Paul wants to present— families, history, city beauty, parks, education, knowledge industries, entertainment and the Arts--the promotion of boutique hotels and established hotels would be a more consistent path to our image.
- With the number of rental apartments built and being built, it would seem that their management could set aside a number of short-term rental units for week-end or week-long visitors. In most cities, short-term rentals cost between \$75 and \$500 per day. This is incentive enough for large rental units.
- Given the challenges faced by other cities, I would continue keeping short-term rentals illegal. In economics and regarding cities, it's OK to be unique. St. Paul should gracefully build its uniqueness.

Section 1—Licensing (Page 5):

- Concern about reliance on platform to provide data, enforce issues
 - Up until now, platforms have resisted providing that for other municipalities
 - Does the City have sufficient resources allocated to enforce other requirements such as compliance with ordinance; maintenance of lodging log; maintenance of fire certificate of occupancy, insurance and licensure?
- Engaging in “adverse action against the platform” if the platform doesn’t perform as needed will be expensive and time-consuming, making this a potentially high-risk approach vs. the City controlling these aspects

Section 2—Fire Certificate of Occupancy (Page 5):

- “Complaints about STRs would be handled by DSI in the same manner that property complaints are handled currently.” Issues with this:
 - Low immediacy—puts the onus on neighbors to call the police, try to find their landlords, figure out how and who to complain to, etc. when there are issues.
 - What are the consequences? Again, how will critical issues be addressed without long time periods without action with multiple involved parties—police, DSI, property owner, neighbors, ST renters, platform?
 - Assuming many/most of these rentals will occur on weekends, will DSI have staffing on weekends?
- “Five-star ratings on host platforms” is not going to help neighbors with complaints who also can’t register their experiences.
- “STRs in owner-occupied or resident-occupied units would not require a fire certificate of occupancy.” This is potentially dangerous—it presumes fire safety with no basis in fact, and when STRs make these residences, de facto, multi-family, why would the same fire safety requirements not be followed?
- “Note that the owner of an owner-occupied short term dwelling unit does not need to be present during the rental period, except for duplexes with two short-term rental units.” This opens the doors to abuses where owners claim a building is owner-occupied to get the lesser requirements, but actually doesn’t live there. Who is going to monitor/enforce?
- “Rather than requiring an agent, Saint Paul opts to obtain contact information for a responsible party in addition to the host as part of the license process but not require the responsible party to be available 24/7.” What if there are issues and nobody can be reached? It is unclear how this can be enforced or complied with.

- Requiring inspections every 1-6 years, depending on the type of unit, is insufficient—a lot can change in just a year.
- I'm ok with the time frame for the inspections matching the current standard. The idea behind the 1-6 year inspection for COOs is that problem properties will get inspected more frequently. This serves two functions — it makes sure that known problems get more City attention, and it gives owners a big incentive to be proactive with repairs and maintenance and get a good grade on their inspection. It seems to me that using the current COO for safety inspections process is reasonable.

Section 3—Zoning (Page 6):

- The City is attempting to avoid setting limits on frequency of rentals, saying, "...it is difficult for the City to determine how often a unit is rented." However, the City is also relying on the platform to inform them of this, specifically, in order to collect taxes. This makes no sense, and by not limiting the frequency in which units can be rented, it opens the door to what other cities have experienced re: property being acquired and used exclusively for STRs, thus removing them from the larger rental pool for long-term residents.
- "Staff also considered a provision to require a conditional use permit for non-owner occupied STR dwelling units. However, this provision would require a much larger regulatory framework than envisioned under the proposed amendments." This conflicts with the stated ability for some owners to obtain CUPs later in the document. Which is it—CUPs or no CUPs?
- Owner occupied STRs are similar to getting a roommate; the city currently has no regulatory policy on roommates/subleasing, instead leaving this up to homeowner, landlord, or condo association. I've thought longer on my previously expressed concern regarding the Grand Ave renter who is running a small-time STR out of her apartment, and feel that it is the landlord's job to prohibit such activity. (Generally speaking, most leases only allow subletting with LL approval, so that tenant is likely already in violation of her lease and could potentially face eviction for her STR activity.) Moreover, the City outlawing it isn't likely to be any more effective at stopping tenants from illegally hosting an STR than the LL, in my opinion.

Section: Proposed Amendment—STR Dwelling Unit Discussion (Page 7):

- Paragraph two says that in non-1 or 2-family zoning districts "one or up to half of dwelling units on a lot, to a maximum of four, may be used for STR. More than four STR dwelling units may be allowed for buildings with more than ten units when a conditional use permit is obtained by the building owner. The intent is to limit the number of STR units in a building to no more than 50% to prevent quasi-hotels." On Page 11, the amendment language for 65.645 (a) confirms this language.
 - This is very concerning for areas such as Grand Avenue and apartment buildings within the Summit Hill district that this would pertain to. It could potentially remove up to half of the rental units in the district, most of which are more affordable (renting at or near the median rental rate for St. Paul).
 - Again, the availability of CUPs to expand STRs for larger buildings contradicts the earlier statement about wanting to avoid them.
- Having more than one class of STR seems reasonable, but I'm not convinced that the classes as proposed will have the desired effect. The number of units seems a more important classification than whether or not the property owner is on-site. I would propose to have one classification for owner-occupied duplexes and single family (regardless of owner occupancy); and a second classification for non-owner occupied duplexes, triplex and 4-plex properties,

which would warrant a higher burden of regulation because they are becoming more like a B&B. I would propose a flat out prohibition on STRs in anything larger than 4 units. Larger than 4 is definitely more commercial in nature, and should have to apply to become a hotel or B&B.

- The 50% limit does not seem useful to me. Some of these potential problems come from “mixed” occupancy—i.e. the strangers having access problem. If a 4-plex is all STR, that’s probably better than if two units are long term and two are short. (I don’t think I’d want to live in a 4-plex that’s half itinerate, personally).
- There could be a limit on the number of STRs by class and by area. Limits would be intended to cut down on the concern for a loss of affordable housing, as well as on the competition problem for hotels & BnBs). I know other places have done this, and wonder if there’s enough data to know if it’s had the desired effects.
- There should be a general rule on number of occupants per rental unit, and a no event hosting (i.e. “no party house”) rule. The rule would have to be enforced by the operator, and, yes, it would largely be on a complaint basis, but the rule would give bigger teeth to enforcement—both for operators to prevent parties, and to have recourse against party-hosts; as well as for neighbors to complain (with the possible threat of having an STR license revoked).

Table 63.207 Minimum Required Off-Street Parking by Use (Page 12):

- STR Dwelling Unit: 1 space per dwelling unit and 0.5 spaces per every 2 adult guests
 - How will this be calculated for apartment/condo buildings with multiple units?
 - How will this be enforced and monitored?
- Parking has been argued both ways — STRs result in less use of on-street parking, or more parking should be provided. I would propose not adding any additional parking rules at this time.

Dadlez, Kady (CI-StPaul)

From: GorillaMa <avechr@gmail.com>
Sent: Friday, June 02, 2017 12:10 PM
To: Dadlez, Kady (CI-StPaul)
Subject: Re: question for Airbnb public hearing on June 2nd, 2017

Hi Kady,

The draft says that a triplex can have one short term rental, but an owner occupied duplex can have two short term rentals. It doesn't give information about an owner occupied triplex, but it why wouldn't an owner occupied triplex at least have as many (2 in this case) as an owner occupied duplex?

Thank you in advance!
Christine

On Fri, Jun 2, 2017 at 7:52 AM, Dadlez, Kady (CI-StPaul) <Kady.Dadlez@ci.stpaul.mn.us> wrote:

Hi Christine-

A triplex would be allowed to have one short term rental unit according to the draft ordinance. Let me know if you have any other questions.

-Kady



Kady Dadlez

Senior City Planner

Planning and Economic Development

25 West Fourth Street

Saint Paul, MN 55102

P: [651-266-6619](tel:651-266-6619)

The Most Livable
City in America

F: [651-266-6549](tel:651-266-6549)

kady.dadlez@ci.stpaul.mn.us



Making Saint Paul the Most Livable City in America

From: GorillaMa [mailto:avechr@gmail.com]
Sent: Thursday, June 01, 2017 11:37 PM
To: Dadlez, Kady (CI-StPaul)
Subject: question for Airbnb public hearing on June 2nd, 2017

Hello Kady,

I am an Airbnb host living in an owner occupied triplex on the West Side in St. Paul. I have lived here 17 years, and raised a family here, and I am a landlord as well. I enjoy hosting Airbnb guests, and I am on disability, and the income really helps sustain me. I have a five star rating, and I only rent guest rooms to individuals, not couples, to keep traffic and noise down.

My question for you is regarding the 16 page document studying the short term rentals. On page 15, it talks about single homes, duplexes, owner occupied duplexes, and then it jumps to fourplexes. How many short term rentals are you advising owner occupied landlords of triplexes to have? That is where I need clarification.

I am hoping to go to the meeting tomorrow but I am uncertain if I will be able to do so at this moment so I am writing you in case I cannot be there to make my question in person!

Thank you for your help!

Sincerely,

Christine



June 2, 2017

Kady Dadlez
City of Saint Paul
15 Kellogg Blvd. West
Saint Paul, MN 55102

CC: Saint Paul Planning Commission

Dear Ms. Dadlez:

Thank you so much for allowing us the opportunity to comment on the City of Saint Paul's proposed short term rental zoning amendments. We appreciate the transparent and practical approach you have taken.

We understand that the effort to create effective regulations for short term rentals is timely as the City of Saint Paul joins Minneapolis in hosting Super Bowl LII next year. During Super Bowl LI, our short term rental host community helped the City of Houston substantially expand its lodging capacity and take full economic advantage of the event. In total, our hosts welcomed 8,200 guests and generated an estimated \$6 million economic impact, including \$4 million in direct income for Houston hosts. Half of our Houston Super Bowl hosts were hosting for the first time. We expect that our community will also help the Twin Cities to make the next Super Bowl an unmitigated success for your citizens, local businesses, and tourism brand.

As Saint Paul considers its regulations, we urge the city to keep them as simple, clear, and easy to follow as possible. Our hosts want to follow laws, but they're not professionals - most are only hosting roughly two months per year. And, nearly half are sharing only a private room in their home, often empty nesters (35% of our hosts are over age 50).

With regard to your proposed amendments, we have two concerns in particular:

Airbnb suggests reconsidering the proposal to limit STR permits based on building type, which it believes will be cumbersome for the City to administer, confusing for hosts to understand, and fundamentally unfair in practice.

The proposal to regulate short term rentals based on building type will be unwieldy for both the City and the STR community, and will ultimately hamstring the city as it attempts to expand lodging capacity for the Super Bowl. We understand the intent is to limit short term rentals in order to "prevent quasi hotels." However, we suggest the city consider alternate approaches, as the current proposal will lead to several implementation issues.



First, the current proposal requires the owner of a building with ten units or more to obtain a conditional use permit. This ignores the fact that home sharing usually occurs at the unit level, rather than the building level (ultimately encouraging what the City is trying to prevent). It also ignores the fact that renters may want to share their homes in order to afford increasing rent prices, and that many units are owned by their occupants, rather than the building owner.

Second, regulating a host based on his or her neighbor's decisions is fundamentally unfair. If two occupants in a four-unit building received permits but only hosted for one weekend (say, the Super Bowl), they would preclude their neighbors from hosting legally for the rest of the year. This proposal also assumes that once permitted, hosts will share their homes on a constant and uninterrupted basis, when in reality the typical host in Saint Paul only shares his or her home 70 nights per year.

Finally, this proposal will be confusing for both hosts and the city. Hosts in multi-unit buildings would be expected to coordinate with each other to understand who has a permit. Home owners would not be able to rent out individual rooms in their homes. The City would have to track when each permit expires, so that precluded neighbors would know when they are able to apply. Moreover, we suggest that if a regulatory proposal is so cumbersome that it must be accompanied by both examples and diagrams - it is too cumbersome for first time hosts to understand, and will likely lead to low compliance.

One alternate approach could be limiting the number of permits each host may have. We currently estimate that 90% of our hosts have only one listing. However, using the City's limit of four permits per building, we propose that hosts are limited to four permits total, unless they receive a conditional use permit. This would address the city's concern of entire buildings being turned into "quasi hotels," as it would maintain the same restrictions on building owners or individuals who list multiple properties for short-term rent. However, it would also simplify the process by creating one clear standard for all hosts, regardless of what building they live in.

Current platform license requirements would violate federal law, and obstruct Airbnb's ability to work collaboratively with the City.

We hope to work with the City to ensure compliance among our host community. However, the current proposal ignores our desire to work in good faith, and imposes requirements that violate established federal communications law.

We understand from our conversations with City staff that the intent behind the platform registration requirements is to create a process to take down listings that are not compliant with City rules. However, requiring Airbnb or any other platform to remove listings would violate the Communications Decency Act, which holds that platforms may not be punished for editorial functions such as electing to remove (or not remove) content.



Instead, Airbnb is open to creating a voluntary process with Saint Paul through which Airbnb would remove problem hosts after appropriate notification and consideration. Indeed, Airbnb already offers the [Neighbors Tool](#), which is way for any citizen (or policymaker) in Saint Paul to directly communicate concerns about STRs to our staff, and begin the takedown process if necessary. We already work with several cities on this issue, and are happy to share our learnings with Saint Paul.

Conclusion

Airbnb hopes to continue working with the City of Saint Paul to create the best regulatory system possible for its residents, businesses, and communities. We want to learn more about your concerns, to share best practices, and to provide updated information about the scope and size of our community. We believe that by working together, we can create rules that allow Saint Paul to reap the full economic and social benefits of home sharing.

Thank you for your time and consideration.

All the best,

Laura Spanjian
Policy Director
Airbnb

Attachment A: About Airbnb

Attachment B: Profile of Airbnb Community in Saint Paul

Attachment C: Neighbor Notification



About Airbnb

Founded in August of 2008, Airbnb is an online marketplace that allows people to list, discover, and book unique accommodations around the world — whether a spare bedroom, an apartment, a cabin, or a castle. Airbnb allows individuals to safely and securely locate each other, communicate, and make financial transactions in over 34,000 cities and 190 countries.

How Airbnb Works

Everyday people decide to list their homes on Airbnb. Hosts create profiles for themselves and their property, choose their own price and availability and set guidelines for guests.

1. Guests search for hosts who are renting extra rooms or entire homes.
2. Hosts and guests learn about each other through past reviews, connections on Facebook, and personal communication through Airbnb.
3. Guests and hosts use Airbnb to confirm travel dates, expectations, and pay.
4. Airbnb holds onto the payment until 24 hours after the reservation begins.
5. Hosts keep 97% of booking fees.
6. After the stay, both hosts and guests leave reviews for one another, which are public for all future hosts and guests to read.

Airbnb Community in Saint Paul in 2016

- **200** Hosts
- **4 nights** Average length of stay per guest
- **\$2.5 million** Total host earnings
- **44,000** Saint Paul residents used Airbnb to travel elsewhere
- **43** Average host age
- **10,000** Guest arrivals
- **47%** of listings are private rooms
- **70** Nights hosted annually per typical listing

Airbnb's Commitment to Paying Taxes

Airbnb recognizes that the tourism industry is an important economic driver around the world, including a significant source of revenue for local governments. We proactively work with cities and states to collect taxes on our hosts' behalf, and remit them directly to local governments. As of May 1, 2017 we'll be collecting and remitting tax in over 250 jurisdictions, and we hope to do the same in the State of Minnesota.

Overview of the Airbnb community in :

Saint Paul, Minnesota, United States

Chose an aggregation level

- city
- state
- country

Pick an area

Saint Paul, Minnesota, United States

Pick a date

- 2015 (calendar year)
- 2016 (calendar year)
- May 1, 2017

All Definitions

Annual Earnings (Typical Host)	Median value of total income earned by host during the one-year study period. Annual earnings are presented for typical hosts.
Average Length of Stay	The average length of stay per guest, rather than per trip.
Guest	Airbnb community members who stay in Airbnb listings.
Host	Airbnb community members who rent space on Airbnb.
Inbound Guest	All guests visiting a particular location. Inbound guests includes guests who live in the same location they may have stayed in.
Listing (Active)	A property listed on Airbnb. Listings may include entire homes or apartments, private rooms or shared spaces. Active Listings are all listings that appear on the website during a search. Active listings do not necessarily have availability on a particular date or at all.
Entire Home / Apartment Listing	A listing where the guest can rent the entire home from the host. The host is not present in the home during the guest's stay.
Private Room Listing	A listing where the guest can rent a private bedroom within a home. The host may be present in other parts of the home during the guest's stay, and the guest may share common spaces like the kitchen, living room, and/or a bathroom with the host.
Shared Room Listing	A listing where the guest can rent a communal space, such as a shared bedroom or a living room sofa bed, within a home. The host may be present in the home during the guest's stay, and the guest may share common spaces like the kitchen and/or a bathroom with the host.
Nights Hosted (By Listing)	Total number of nights a given listing is rented through Airbnb in the study period. Only listings that were active as of the start of the study period, and had at least one booking during the study period are included, in order to present the most representative annual values for Airbnb hosting activity.
Outbound Guest	All guests from a particular location who booked an Airbnb listing, regardless of where the listing is. There may be some minor overlap between Inbound Guests and Outbound Guests. All guests associated with a particular reservation are attributed to the location of the booking guest.
Typical Host	The median host for all hosts who had at least one active listing as of the start of the study period and at least one booking during the study period. Typical host definitions are used to calculate Annual Earnings and Nights Hosted. Presenting the median value for all hosts who were active as of the start of the study period provides the most representative values for the Airbnb host community.



Overview of the Airbnb Community in Saint Paul, Minnesota, United States

The following page captures the Airbnb community in Saint Paul, Minnesota, United States

HOSTS

CURRENT ACTIVE HOSTS
as of 2016 (calendar year)

200

AVERAGE HOST AGE

43

ANNUAL EARNINGS FOR A
TYPICAL HOST

\$7,300

GUESTS

INBOUND GUEST ARRIVALS IN
THE PAST YEAR

10,000

AVERAGE LENGTH OF STAY
PER GUEST

4

OUTBOUND GUEST ARRIVALS
IN THE PAST YEAR

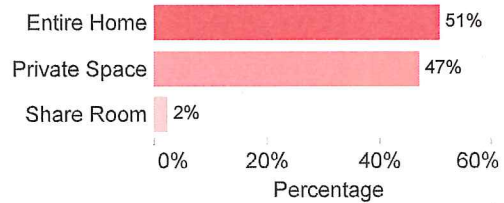
44,000

LISTINGS

NIGHTS HOSTED PER YEAR
FOR A TYPICAL LISTING

70

CURRENTLY ACTIVE LISTINGS BY TYPE



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Overview of the Airbnb Community in Saint Paul, Minnesota, United States

The following page captures the Airbnb community in Saint Paul, Minnesota, United States

HOSTS

AVERAGE HOST AGE

43

ANNUAL EARNINGS FOR A TYPICAL HOST

\$7,300

GUESTS

INBOUND GUEST ARRIVALS IN THE PAST YEAR

10,000

AVERAGE LENGTH OF STAY PER GUEST

4

OUTBOUND GUEST ARRIVALS IN THE PAST YEAR

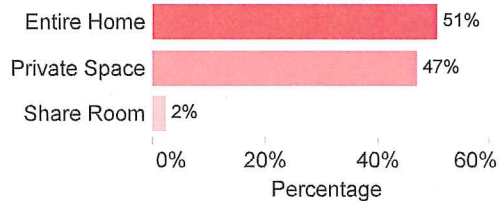
44,000

LISTINGS

ACTIVE LISTINGS

296.0

CURRENTLY ACTIVE LISTINGS BY TYPE



NIGHTS HOSTED PER YEAR FOR A TYPICAL LISTING

70

Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Airbnb Host and Guest Profile

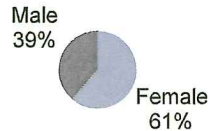
Airbnb hosts in Saint Paul, Minnesota, United States are respectful community members who enjoy sharing their homes with guests from all over the world.

HOST PROFILE

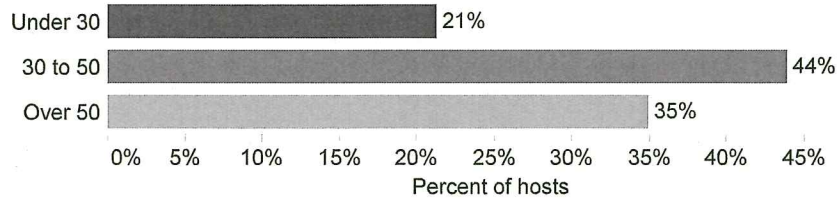
AVERAGE HOST AGE

43

GENDER BREAKDOWN



AGE BREAKDOWN



GUEST PROFI..

AVERAGE GROUP SIZE

2.1 people

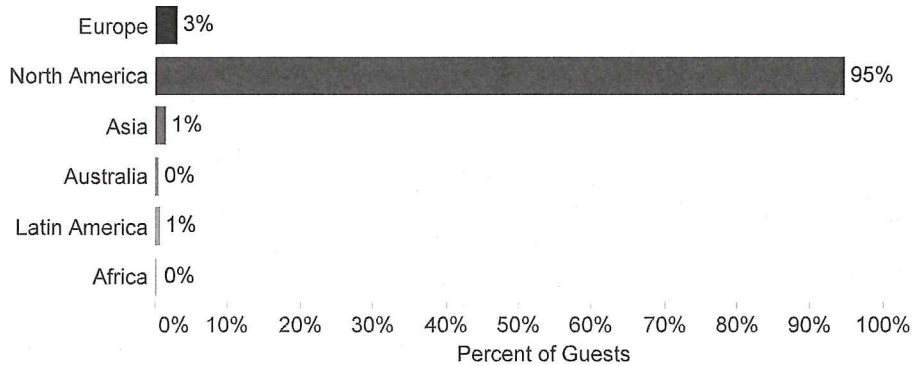
PERCENTAGE OF TRIPS THAT INVOLVE 4 OR FEWER GUESTS

96%

AVERAGE AGE OF BOOKING GUESTS

41

GUEST ORIGIN



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Hosting Behavior

For many hosts in Saint Paul, Minnesota, United States, home sharing is an economic lifeline that makes it possible for residents to pay the bills, make ends meet, and stay in the cities they love. Hosts tend to host occasionally throughout the year, and earn modest but significant supplemental income.

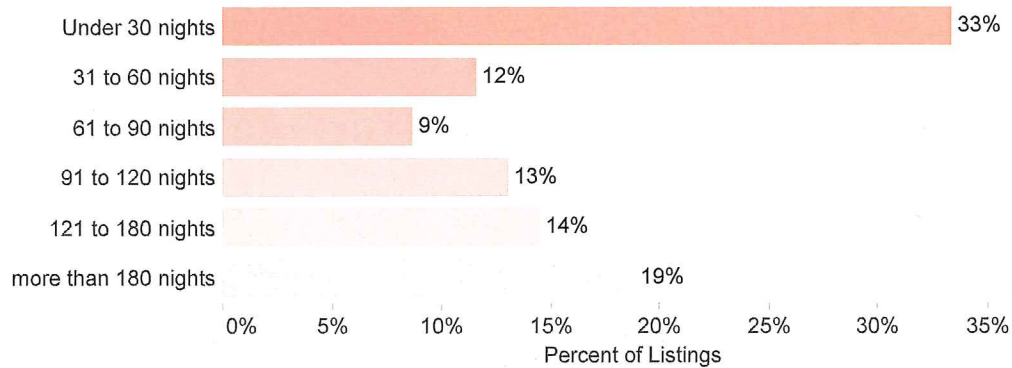
NIGHTS HOSTED PER YEAR
BY A TYPICAL HOST

70

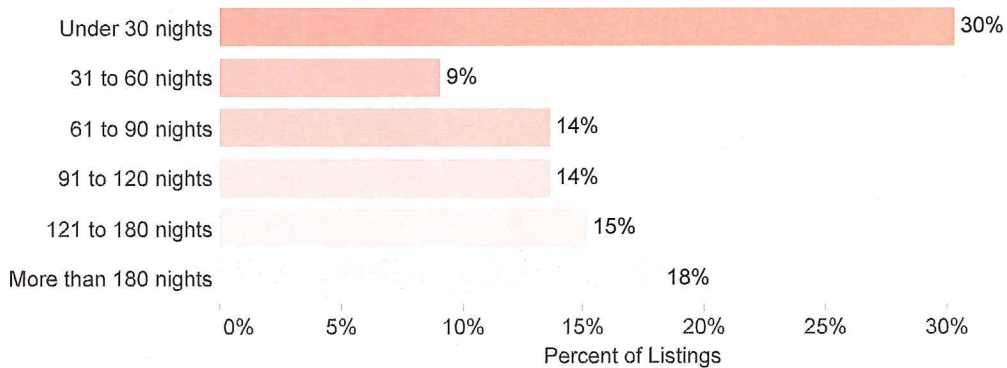
ANNUAL EARNINGS FOR A
TYPICAL HOST

\$7,300

NIGHTS HOSTED PER LISTING - ALL LISTINGS



NIGHTS HOSTED PER LISTING - ENTIRE HOME LISTINGS



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017



Geographic Distribution of Listings

The following page the geographic distribution of active listings in Saint Paul, Minnesota, United States

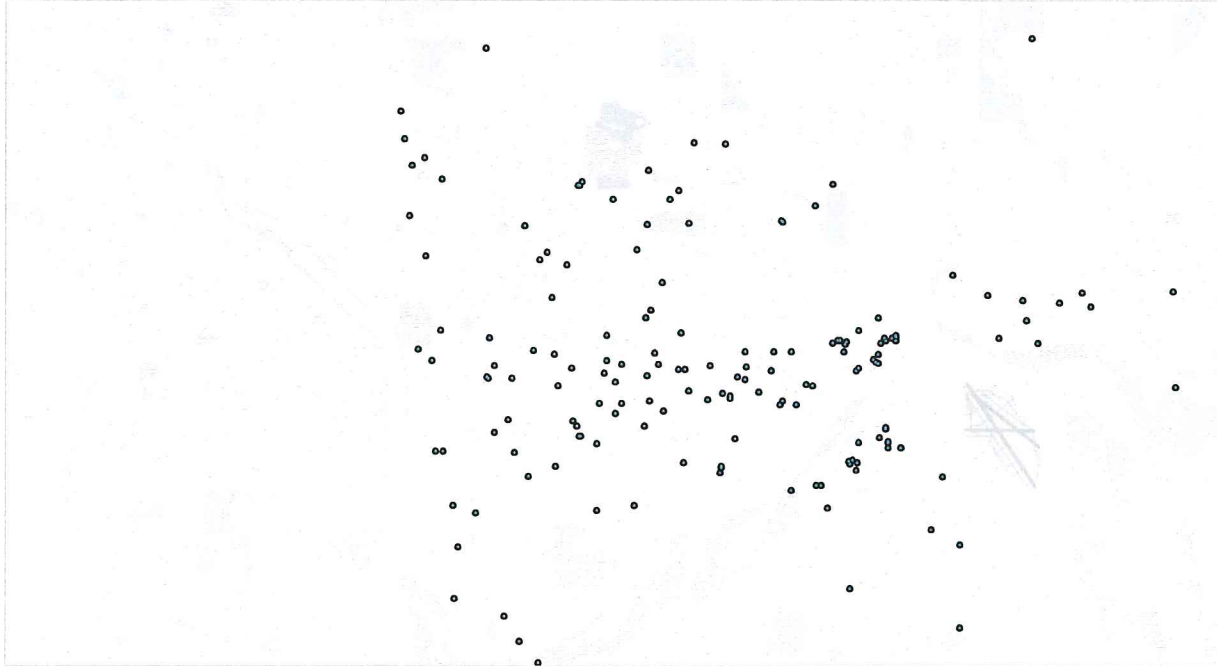
Aggregation Level

- city
- state
- country

Pick an area

Saint Paul, Minnesota, United States

Map listings that were booked in the last 12 months in Saint Paul, Minnesota, United States



Note: All data above is drawn from Airbnb proprietary bookings data. Data based on the one year period preceding January 1, 2017





A Resource for Neighbors

Every time a host welcomes a guest into their home, they are also welcoming them into their neighborhood. We're proud that since Airbnb began, over 80 million guest arrivals been welcomed by hosts and their neighbors in over 190 countries worldwide.

The overwhelming majority of Airbnb guests are respectful travelers, so complaints and issues are incredibly rare, but we always want to do everything we can to help our community members be good neighbors in the places our hosts call home. To help achieve that goal, we launched a new resource for neighbors of Airbnb hosts.

Anyone can go to airbnb.com/neighbors to share specific concerns they might have about a listing in their community. These concerns could include things like noise complaints. From there, our team will review their concern and, if necessary, follow up with the host regarding the issue.

Neighbors can submit information without having their name disclosed to a host or allow our team to pass along their contact information so the host can follow up with them directly. Once a neighbor submits feedback, we will send a confirmation email, along with a case number.

We'll treat each case seriously and ensure that we give hosts and their neighbors the opportunity to resolve concerns themselves, whenever possible. Hosting is a big responsibility and those who repeatedly fail to meet our standards and expectations will be subject to suspension or removal from the Airbnb community.

Our community of hosts, guests, and neighbors is defined by a set of values that support our shared mission to create a world where people can belong anywhere. We're excited to offer this tool as we continue to work to support everyone — including neighbors — in the Airbnb community.

Dadlez, Kady (CI-StPaul)

From: Bonnie Jean MacKay <walke020@umn.edu>
Sent: Monday, June 05, 2017 10:52 AM
To: Dadlez, Kady (CI-StPaul)
Subject: Airbnb Experience and Gratitude for Opportunity

Dear Kady,

I learned about Airbnb from Sean Doyle, and, while my spaces were very humle in comparison with his, the rental income made it possible for me to pay my house payment, and insurance when my University of Minnesota job was cut to half time. Had the wonderful means of reaching out to people who were prescreened and reviewed to offer a low-cost lodging alternative not been available to me, I may not have been able to keep my home.

I have hosted people from all over the world, and my life has been enriched by meeting them. The people who come through are delightful and kind and gentle folk who have been grateful for a place to stay in a welcoming home in a quiet residential neighborhood. They have not upset any of my neighbors, and they have been tremendously respectful.

The income I gained allowed me to not only pay the house payment, but also continue to make much needed improvements to the house and property. I am not presently participating in the Airbnb system, as I was remodeling the kitchen, and I need to make some changes to the house, and want to be sure that everything is in better condition to impress, or at least make comfortable my future guests.

Airbnb was originally touted as an opportunity to find unique and novel places to sleep and where there may or may not be a host in residence. I found the whole idea simply wonderful, and offered up a delightful little cabin in in my back yard. It was set up so that guests had a private place to sleep and relax, but needed to come into my home to use my bathroom. People loved it! It was inexpensive, and close to where they wanted to be while in town for various purposes. I ran into difficulties when an inspection was made in my absence, and no Saint Paul code was available to fit the unique situation of allowing people to sleep in a little tiny cabin with a lofted bed, and use my bathroom indoors. I continued to rent out a room in my house, but the income was cut in half ust at the time that I was fully laid off from my University of Minnesota job.

Still the income the upstairs room generated for a few months continued to help me maintain the home, and I managed to keep from losing it.

I am very much in favor of the Airbnb sharing economy, and I figured my taxes by considering it a business, and paying taxes on the income generated.

Sincerely,
Bonnie Jean

Bonnie Jean MacKay

651-428-2084 Mobile Phone
walke020@umn.edu

Our lives begin to end the day we become silent about things that matter. Martin Luther King, Jr.

Dadlez, Kady (CI-StPaul)

From: Tess Galati <tessgalati@icloud.com>
Sent: Saturday, June 03, 2017 11:15 AM
To: Dadlez, Kady (CI-StPaul)
Cc: Anastasia Galati
Subject: Short Term Rental Testimony

Dear Ms Dadlez and Planning Commissioners:

My name is Anastasia (Tess) Galati. I moved into 482 Holly Avenue, a house built in the 1870s and registered in Ramsey County in 1884. I have lived here for 41 years.

In the early 80s, every house on the block was robbed except mine. My house looked so bad it was beneath the interest of any burglar. I know every square inch of my house. I have nailed it, painted it, bought it, cleaned it, wired it, planted it. But it's never finished. Every year I budget \$5000 to upgrade, repair, and keep my house safe, solid, and attractive. Needless to say, I love my house and garden. Property tax, homeowner's insurance, and utilities cost another \$24,000 a year. Keeping a 150-year-old house going is not cheap.

I am a retired, 76-year-old Airbnb host. I have been a professor, a business consultant, and a small business owner. I was paid well, and I paid my employees well, so I am not a rich woman. I've always loved hosting and entertaining friends and family, so hosting Airbnb guests fits me perfectly. Plus, the earnings make it possible for me to keep my house.

Three years ago, I upgraded and furnished my loft apartment, and I advertised it as a fully furnished regular rental. Not one person came to see it. That's when I turned to Airbnb, which was such a joy that I then turned my guestroom into an Airbnb rental as well. Based on my experience and the reports of friends who have rental properties, it's hard to believe that Airbnb has stressed the regular rental market in Saint Paul.

My nextdoor neighbor runs a regular, registered Bed and Breakfast, and he reports his business had the best year ever last year. We help each other, sharing cleaning assistance and referring guests we can't accommodate. Obviously, having an Airbnb as a next door neighbor does not hurt his business. I've concluded that I serve guests who can't afford to stay at his place, which costs three times as much as mine.

When hotels, inns, and regular Bed and Breakfast establishments want to shut down Airbnb, or when taxi companies want to shut down Uber, it's like horsewhip and horseshoe establishments wanting to get rid of the horseless carriage. The new economy will go on, either under social guidance or under the radar. Municipalities are caught in the middle of this

enormous social change. Tread lightly. In solving a problem for the hotels, you may create a much bigger problem for the city.

I am passionate about Airbnb because it is more than a business to me. It is my doorway to the world. I now have good friends in Bangalore, Berlin, Boston, Beijing. They have been guests in my home. They have invited me to theirs. This is especially important to me because I suffer from a rare immune deficiency: dysgammaglobulinemia. I catch just about everybody's cold, and when I do I'm sick four to six weeks. An airplane cabin—in fact, any closed space packed with people—is dangerous for me. I love to travel, but I do it rarely and fearfully. Airbnb lets me stay connected while I'm at home.

I am not against regulation. However, if regulations make it necessary for me and others to stop hosting guests, many of us will have to leave our homes. If that becomes necessary, it would be tragic because our homes and guests enrich our lives and the life of this community. Please tread lightly.

Yours sincerely,

Anastasia (Tess) Galati, Ph.D.

651.210.6799

Dadlez, Kady (CI-StPaul)

From: Bondhus Lance <lancebondhus@outlook.com>
Sent: Monday, June 05, 2017 12:40 PM
To: Dadlez, Kady (CI-StPaul)
Subject: VRAMN Comments for STR
Attachments: ST Paul proposal - VRAMN.pdf

Dear Kady Dadlez and St Paul City Council,

We would again like to thank you for keeping us all involved and informed as we work together through the future regulations of Short Term Rentals in St Paul.

A number of us have conversed since the meeting on June 2nd, 2017 and we would like to reiterate our support for the VRAMN proposal attached. Here are the cliff notes highlighting the areas of most importance:

- We support taxation through the platforms and outside of the platforms.
- We support licensing verification through the platforms and outside of the platforms.
- We do not support Short Term Rentals falling under the commercial code.
- We do not support the proposal to limit the number of short term rentals in a multi-unit building to 50% or less.
- We Propose that Short Term Rentals be identified as a type of rental under the Fire Certificate of Occupancy and create educational requirements specific to Short Term Rentals.
- We are supportive of “tiering” these types of certificates as proposed by a speaker at the meeting.

Thank you

VRAMN

Vacation Rental Alliance of MN

To Whom It May Concern:

We, the Vacation Rental Alliance of Minnesota, have reviewed the most recent proposal from the city of St Paul as it relates to short term rentals. We have taken the safety and livability concerns into great consideration as well as St Paul's goal to be a place of economic vitality. We have also listened to the concerns over "Leveling the Playing Field" and have some feedback and proposals we would like to be taken into great consideration and hopefully implemented.

LICENSING:

We are very supportive of ensuring every short term rental property has the correct licensing and support the monitoring of licensing through the various platforms. We are supportive of collecting and remitting taxes via the platform or collecting via the platform and then remitting outside of the platform.

FIRE CERTIFICATE OF OCCUPANCY:

We understand and support short term rentals falling under the Fire Certificate of Occupancy guidelines.

ZONING:

The zoning recommendations are of our biggest concern and objection. We do not feel that there is enough supporting evidence showing that STR (short term rentals) have more of a commercial impact than 30+ day rentals and therefore we do not support identifying STR under the commercial code.

The current Fire Certificate of Occupancy does not define the number of days a home can be rented. By editing Sec. 40.04 to include specific requirements for less than 30 day rentals, we feel that this will identify STR as a type of rental and therefore legal.

We propose adding an additional education requirement specific to Short Term Rentals that covers taxation, safety, livability, insurance, etc. This could be in addition or as an alternative to the DSI landlord 101 course. We propose that every short term rental manager/owner would be required to take the version specific to Short Term Rentals. The education provider could be the city or a third party approved by the city. See Chart 1.1 for proposed change example

Chart 1.1

Current	Proposed
<p>Sec. 40.04. - Certification process.</p> <p>(a)</p> <p>Buildings and occupancies requiring a fire certificate of occupancy.</p> <p>(1)</p> <p>A building or portion thereof which receives a certificate of occupancy from the city's building official upon completion of construction or major rehabilitation shall simultaneously receive a fire certificate of occupancy if their use or occupancy so requires.</p> <p>(2)</p> <p>Buildings which have a change in use or occupancy and become subject to the fire certificate of occupancy requirement.</p> <p>(3)</p> <p>One- and two-family dwellings which have a change in status from owner occupied to non-owner occupied or rental.</p> <p>(4)</p> <p>Commercial buildings and residential occupancies which have current fire certificates of occupancy on or after January 1, 2007 shall be subject to the ongoing requirement to maintain a fire certificate of occupancy. These buildings shall be issued fire certificates of occupancy and shall be subject to periodic inspection based on the date of the building's last complete fire certificate of occupancy inspection, subject to the terms of this chapter.</p> <p>(5)</p> <p>One- and two-unit rental dwellings which are currently registered and rental properties under the requirements of this code on January 1, 2007 shall receive provisional fire certificates of occupancy. These properties shall be issued fire certificates of occupancy upon the successful completion of a fire certificate of occupancy inspection.</p> <p>(6)</p> <p>A building which has been registered as a vacant building under chapter 43 of the Legislative Code that subsequently received a certificate of code compliance under <u>section 33.06</u> of the Legislative Code shall be issued a fire certificate</p>	<p>Sec. 40.04. - Certification process.</p> <p>(a)</p> <p>Buildings and occupancies requiring a fire certificate of occupancy.</p> <p>(1)</p> <p>A building or portion thereof which receives a certificate of occupancy from the city's building official upon completion of construction or major rehabilitation shall simultaneously receive a fire certificate of occupancy if their use or occupancy so requires.</p> <p>(2)</p> <p>Buildings which have a change in use or occupancy and become subject to the fire certificate of occupancy requirement.</p> <p>(3)</p> <p>One- and two-family dwellings which have a change in status from owner occupied to non-owner occupied or rental.</p> <p>(4)</p> <p>Commercial buildings and residential occupancies which have current fire certificates of occupancy on or after January 1, 2007 shall be subject to the ongoing requirement to maintain a fire certificate of occupancy. These buildings shall be issued fire certificates of occupancy and shall be subject to periodic inspection based on the date of the building's last complete fire certificate of occupancy inspection, subject to the terms of this chapter.</p> <p>(5)</p> <p>One- and two-unit rental dwellings which are currently registered and rental properties under the requirements of this code on January 1, 2007 shall receive provisional fire certificates of occupancy. These properties shall be issued fire certificates of occupancy upon the successful completion of a fire certificate of occupancy inspection.</p> <p>(6)</p> <p>A building which has been registered as a vacant building under chapter 43 of the Legislative Code that subsequently received a certificate of code compliance under <u>section 33.06</u> of the Legislative Code shall be issued a fire certificate of occupancy concurrently with the certificate of code compliance, if their use or occupancy so requires.</p> <p>(b)</p> <p>Information and application. Owners of all buildings subject to the fire certificate occupancy requirement shall apply for a fire certificate of</p>

<p>of occupancy concurrently with the certificate of code compliance, if their use or occupancy so requires.</p> <p>(b) Information and application. Owners of all buildings subject to the fire certificate occupancy requirement shall apply for a fire certificate of occupancy. The application shall include, at a minimum, the following information:</p> <ol style="list-style-type: none"> (1) A description of the building; (2) The name, address and twenty-four (24) hour telephone numbers of the owner(s); (3) The name, address and telephone numbers of the property manager(s) or responsible party; (4) An owner of a building used for residential occupancy who is applying for their first fire certificate of occupancy must complete the DSI landlord 101 course or have completed a similar program approved by the department of safety and inspections within the last two (2) years. The owner must submit with the application a certificate of attendance or a letter showing proof of attendance at the program or verification of enrollment at the next scheduled class. This requirement shall not apply to an owner who has a fire certificate of occupancy on another building used for residential occupancy; and (5) Additional property and property management-related information as will promote effective enforcement of this chapter. 	<p>occupancy. The application shall include, at a minimum, the following information:</p> <ol style="list-style-type: none"> (1) A description of the building and its intended use: longer than 30 days, shorter than 30 days or combination of both. (2) The name, address and twenty-four (24) hour telephone numbers of the owner(s); (3) The name, address and telephone numbers of the property manager(s) or responsible party; (4) An owner of a building used for residential occupancy who is applying for their first fire certificate of occupancy must complete the following education requirements: <ol style="list-style-type: none"> (4.1) For 30 day or longer term rentals, the DSI landlord 101 course or similar program approved by the department of safety and inspections must be completed within the last two (2) years. The owner must submit with the application a certificate of attendance or a letter showing proof of attendance at the program or verification of enrollment at the next scheduled class. This requirement shall not apply to an owner who has a fire certificate of occupancy on another building used for 30 day or longer lease term rental occupancy; or (4.2) For less than 30 day term rentals, the Short Term Rental Management course or similar program approved by the department of safety and inspections must be completed within the last (2) years. The owner must submit with the application a certificate of attendance. This requirement shall not apply to an owner who has a fire certificate of occupancy on another building used for residential short term rental occupancy; and (5) Additional property and property management-related information as will promote effective enforcement of this chapter.
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LEVEL PLAYING FIELD:

We realize that the above proposal does not address the goal of “Leveling the Playing Field”.

https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2366898 is a recent study conducted by Boston University School of

Management that finds STR have little impact on hotels and therefore are not considered direct competition. This study does not address Bed and Breakfasts. It appears that the Bed & Breakfast owners in St Paul have felt or fear that they could be negatively impacted by STR's.

Many Bed & Breakfasts around the state, country and world also advertise on the STR sites, including Airbnb, VRBO, etc. In that aspect, there is a level playing field as it relates to marketing and advertising.

This leaves the zoning code. In addition to the fact that we do not have documentation showing STR have any more of a commercial impact than 30+day rentals, the definition of a Bed & Breakfast is far different than a STR and they should be held to different standards. If the city and/or Bed and Breakfasts feel that there is a common playing field that is not even, we propose re-examining the current regulations for Bed and Breakfasts & determine if changes to those regulations would address those concerns.

STIFLING INNOVATION:

By identify STR under Commercial Zoning code with the regulations currently proposed, innovation in this new emerging market will certainly be stifled and in result, a negative impact to St Paul's economic vitality.

PROPOSED LANGUAGE:

While we are opposed to STR being identified as a commercial use, should the city move forward with the current proposal, we strongly suggest editing Sec. 65.645. Short term rental dwelling unit section a) & b).

Section a) current proposed language limits the number of units on a lot that can be used as STR. Considering that currently there are no restrictions as to the number of dwelling units per zoning lot that can be used for other rental purposes in zoning, we propose removing the limitation of 50% and instead setting the maximum at 4 units in Multi-unit buildings. This will allow 1-4 unit buildings to operate as STR in their entirety. There is not substantial research and documentation to suggest that limiting the number of STR units to 50% would have a more positive impact on a community than without a limit.

Section b) language appears to limit the use of STR exclusively to guests with stays less than 30 days only. The current STR that are in operation today have guests both under and over 30 day stays. We suggest editing that section to include all lengths of stay.

Chart 1.2

Current Proposal	VRAMN Proposal
<p>Sec. 65.645. Short term rental dwelling unit Reserved.</p> <p>A dwelling unit, or a portion of a dwelling unit, rented for a period of less than thirty (30) days.</p> <p>Standards and conditions:</p> <p>(a) In RL – RT1 districts, there shall be no more than one (1) short term rental dwelling unit on a zoning lot. In other districts up to 50 percent of dwelling units, to a maximum of four (4), in multi-unit buildings may be short term rental dwelling units.</p> <p>(b) A short term rental dwelling unit shall not be open to the public, but shall be used exclusively by registered short term rental dwelling unit guests.</p> <p>(c) No exterior identification sign of any kind shall be permitted.</p> <p>(d) Total occupancy of a short term rental dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit except that occupancy in excess of the definition of family may be permitted with a conditional use permit, on a case by case basis, for large one- and two-family dwellings on large lots.</p>	<p>Sec. 65.645. Short term rental dwelling unit Reserved.</p> <p>A dwelling unit, or a portion of a dwelling unit, rented for a period of less than thirty (30) days.</p> <p>Standards and conditions:</p> <p>(a) There shall be no more than (4) short term rental dwelling units on a zoning lot.</p> <p>(b) A short term rental dwelling unit shall not be open to the public, but shall be used exclusively by registered guests.</p> <p>(c) No exterior identification sign of any kind shall be permitted.</p> <p>(d) Total occupancy of a short term rental dwelling unit shall not exceed the definition of family in Section 60.207 allowed in a single housekeeping unit except that occupancy in excess of the definition of family may be permitted with a conditional use permit, on a case by case basis, for large one- and two-family dwellings on large lots.</p>

In closing, we appreciate your efforts to involve the hosts, the community and all of those impacted by new regulations as it relates to STR. As the current St Paul proposal stands, we feel that it runs the risk of stifling innovation by over-regulating in anticipation of adverse outcomes which may or may not occur. In drafting regulations, it is vitally important to distinguish between perceived and actual risk. The best regulations are based on empirical data and appropriate analysis, data which as a community we will acquire over time as issues arise. We sincerely hope that you will move forward on working with what we have proposed and value further discussions before final decisions are made.

Sincerely,

Vacation Rental Alliance of Minnesota

Dadlez, Kady (CI-StPaul)

From: Stacey Johnson <staceyjohnsoninteriors@yahoo.com>
Sent: Monday, June 05, 2017 1:35 PM
To: Dadlez, Kady (CI-StPaul)
Subject: STR proposal
Attachments: St. Paul Proposal - Short term vacation rentals (1).pdf

Hi Kady,

It was nice to meet you the other day at the hearing. I have attached a letter from the MN Vacation Rental Alliance to express my support in favor of what is outlined.

I also strongly agree that the zoning change to commercial is not necessary and to limit the number of units to 50% of total will not achieve what it is intended to. The triplex I own is already zoned multi-family and falls under the CO, making it legal to rent. I have 3-4 occasions every year where it is rented for longer than 30 days, and other times it is rented for less than 30 days. What the city is proposing doesn't take this fact into account and would have a negative financial effect.

I am quite sure if you asked my neighbors whether my property feels "commercial" to them they would have no idea what you are talking about, and would tell you that it blends seamlessly into the neighborhood and has great charm. There is less congestion on the street with the STR because most guests fly in and take Uber. If it was a long term rental a typical tenant/spouse would each have a car and park every day on the street. This seems counter to the commercial argument.

I hope you take this and all other items we've outlined into account and adopt a version of our proposed language.

Kindly,
Stacey Johnson

Making the world more beautiful one room at a time.....

Stacey Johnson

Dadlez, Kady (CI-StPaul)

From: Kahle, Paige <Paigekahle@edinarealty.com>
Sent: Monday, June 05, 2017 2:26 PM
To: Dadlez, Kady (CI-StPaul)
Subject: STR Ruling in Saint Paul
Attachments: St. Paul Proposal - Short term vacation rentals (1).pdf

Importance: High

Hi Kady: I operate a STR in Saint Paul and support the attached that was drafted and presented by the Vacation Rental Alliance of Minnesota. I would support the 50% rule on properties that have 5+ units; however for properties with 4 units or less, this seems to be an onerous requirement as these properties are not considered commercial as it is currently defined by City code. Thank you for your consideration! Paige Kahle

Paige Kahle
Coleman.Kahle.Realtors
Edina Realty
651.308.2754
paigekahle@edinarealty.com
colemankahle.edinarealty.com

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Dadlez, Kady (CI-StPaul)

From: Kris Ulmer <kris@paii.org>
Sent: Monday, June 05, 2017 3:14 PM
To: Dadlez, Kady (CI-StPaul); stay@corbanmanorinn.com
Subject: Kris Ullmer at PAII sends Testimony. Please confirm receipt!
Attachments: Saint Paul Planning Commission Testimony re STRs 6-2-17.pdf; Saint Paul Planning Commission Testimony re STRs 6-2-17.docx

Hello Kady and Pam:

First - Kady, it was a pleasure meeting you, and I hope the party for your graduating triplets went fabulously!

Thank you for all of your work on the STR issue. The 'family' definition applied to STRs is a departure from the occupancy definitions applied to B&Bs and other lodging types. "Families" occupy long-term rentals while "tourists / guests / transients / travelers" occupy short term rentals. And, handing off the occupancy tax collection to Airbnb will result in far lower income than if the city collects directly from the hosts for 2 reasons: direct booking by repeat guests, and the city's inability to meaningfully audit for accuracy.

The Bed & Breakfast zoning / licensing certainly could be modified (for example, the breakfast requirement could be an option, the distance between B&Bs could be changed) and easily adapted for Short Term Rentals.

The STR hosts who testified seemed to be quite savvy; it is likely that they could easily qualify for a B&B license if they chose to do so or were required to do so. Nothing about their business would change except that the proper fees / taxes would be paid! And, that's a good thing.

I've attached a word doc and a pdf of my testimony, along with a few observations at the end (clearly identified as not my testimony).

If there is *anything* that I can do to assist you (samples of other STRs regulations around the country?), please ask!

Due to the 4:30 pm deadline, please confirm receipt! (I'm sending at 3:14 pm CST)

KRIS

Kris Ullmer, Executive Director - PAII
Professional Association Innkeepers International
kris@paa.org 715-921-2327 paa.org



DATE: June 5, 2017 (2:30 pm)

TO: Kady Dadlez, Senior City Planner, Planning & Economic Development

FROM: Kris Ullmer, Executive Director Professional Association Innkeepers International

RE: TESTIMONY Saint Paul Planning Commission Meeting, June 2, 2017

Madam Chairman and Commissioners:

I'm Kris Ullmer, (108 South Cleveland Street, Merrill WI 54452), the Executive Director of the Professional Association of Innkeepers International, and former innkeeper of a licensed Bed & Breakfast. I'm here to support the just and fair regulations for all types of lodging properties.

"Short Term Rental" and the "Sharing Economy" are simply new terms for the exchange of money for lodging.

By inventing these new terms – which do not appear in existing codes, regulations, or statutes – advertisers such as Airbnb and other mega websites con you into thinking this IS something new, and agencies / legislators such as yourselves spend hours and months doing studies and debating what to do.

The answer is simple: short term rentals are in private homes, just like Bed & Breakfasts. Short Term Rentals are in multi-family buildings, like apartments or hotels. The regulations that you have already debated and established for B&Bs and hotels logically apply to short term rentals. It is your responsibility to protect St. Paul's citizens, neighborhoods, guests, and support city services through just & fair regulations.

Back in February during the 'work group' conference call, we heard directly from Airbnb that they are not in the business of policing short term rentals. You have correctly concluded it is up to you to regulate and enforce directly with the hosts.

Every business works to make repeat customers. B&Bs and hotels encourage their guests to book directly with them for the best rate – and the innkeepers saves a 15-20% Expedia or other OTA booking fee. Airbnb hosts do the same – and their guests are even more motivated to book direct because that very guest will save a 9% booking fee. Cities and states that abdicate their responsibility to regulate and collect tax by turning it over to Airbnb, lose revenue when transactions skip the Airbnb pipeline. There is no such taxation loss when the responsibility is rightly placed on the B&B, hotel, or short term rental host.

Short Term Rental hosts will say the regulations shouldn't apply to them – we've already shown that they are in the lodging business. STR hosts will say the regulations are too strict – and they have a valid point. Any changes in regulations: the 1000 foot distance between B&B, or the cap on the number of rooms, or the number of guests per room – can be adjusted and must be applied uniformly, fairly, to all lodging options.

By ignoring the short term rental business, or giving them a free ride or a significantly reduced fare, you will kill the legitimate lodging businesses that now support the city services; it is happening all over the country.

THANK YOU.

We heard experiences from a number of Airbnb hosts. It is interesting to note:

1. A 5-year 'SuperHost' stated that any funds that may come from regulations should go to make the city better. *Isn't that what the present licensing / occupancy taxes already do?*
2. More than one host cited the income earned from hosting enabled them to pay their mortgage. *Isn't that what the income from a licensed B&B does?*
3. More than one host cited the increased curb appeal of their properties and pride in their neighborhood, due to their Airbnb income. *Isn't that what the income from a licensed B&B does?*
4. Two hosts noted it is reasonable to have a proper business certificate (tier system), to be taxed, to notify neighbors and recommended taking the best practices and applying them to St. Paul. *We applaud their reasoning; St. Paul's Bed & Breakfast licensing is scaled to the size of the property – for example, a 1-room B&B is not subject to zoning.*
5. No one chose to specifically address the 'proposed maximum number of guests in a short term rental dwelling unit' as proposed by the zoning code amendment. And for good reason: it is very complicated. The maximum number of adult guests is inversely proportionate to the number of adult residents; however the number of children permitted (lineal descendants, adopted or legally cared for and any domestic employees) is unlimited. Thus, "19 Kids and Counting" is an allowed scenario in a 'single housekeeping unit'. *This is contrary to Bed & Breakfast and Hotel parameters which address maximum number of guests per room and square footage.*

In conclusion, every Airbnb host in St. Paul could easily comply with the present lodging license requirements; they have simply chosen to operate illegally including evading the payment of occupancy taxes.

***** THE END *****

Dadlez, Kady (CI-StPaul)

From: Carl Christensen <c.christensen.charpentier@gmail.com>
Sent: Monday, June 05, 2017 3:56 PM
To: Dadlez, Kady (CI-StPaul)
Subject: Proposed regulation of short term rentals - revised

Hello again, Ms. Dadlez,

Sorry, I found a mistake in my previous email. Please substitute the following:

I own a home in St. Paul and have lived here for a number of years. I have a few comments and questions regarding the proposed regulation of short term rentals.

I am happy to see the relatively unrestrictive nature of the proposed regulations, especially in view of the fact that short term rentals have been taking place in St. Paul for some time with neither law enforcement nor DSI reporting any particular problems. I am less clear on what informs the decision to limit the number of short term rental units per building/lot in the way proposed. What problems are expected to be mitigated by limiting the number of short term rentals to 50% of the total number of units? Unless I missed it, the St Paul short term rental study does not directly address the effect of these limitations on potential problems. Using the "Issues or Concerns" list in a memo from Dan Bremmer II summarizing the January 19, 2017 Listening Session as a guide, here are a few questions:

Traffic congestion on local street systems: According to AirDNA.com, a site that tracks and reports on Air BnB bookings, the average occupancy rate for St. Paul Air BnB rentals is approximately 50%. Since I believe the proposed occupancy limits and parking requirements are based on long term rental limits and requirements, wouldn't having more short term units tend to alleviate congestion?

Bad guests/safety issues/ "stranger danger": As mentioned above, short term rentals have not proven to pose any safety or nuisance issues in St. Paul to date. Would allowing more units have an impact on this? Is there any evidence that short term renters are more dangerous or less trustworthy than long term renters (or anyone else, for that matter)? Short term rental platforms are driven by the ability of guests and hosts to review each other. Bad guests and hosts are quickly exposed and ultimately eliminated from participation. Such instances appear to be extremely rare. In an incident [reported](#) by KARE 11 News in which a Minneapolis host had her apartment "trashed" by guests, Air BnB contributed that such incidents occur only once in every 41,000 rentals. If problems were frequent in rentals, platforms would not so readily offer insurance to hosts and pay for damages, as Air BnB did in this case. If the fear of potential public safety issues among residents is a factor in limiting the number of units and if, as it appears, there is no foundation for such fears, does that mean residents have more of a right to be protected from groundless fears than property owners have to rent their properties to whomever they see fit, provided they abide by health and safety standards that are identical for both rental types?

Creating economic uses in predominantly residential areas: I'm struggling to understand how a rental becomes more of an "economic use" of a property by virtue of the length of a renter's stay. As far as I am aware, the downside of economic uses in residential areas include things that create a less pleasant residential experience, such as increased traffic and noise, signage and so forth. From the outside, short term rentals are virtually identical to long term rentals and because they are not likely to be occupied as frequently as long-term rentals, are likely to create a decrease in traffic and crowding.

Regulation and licensing of platforms is the first step in generating tax revenue from short term rentals and a step in the direction of addressing unfair competition issues. Other than those mentioned above, what issues contribute to the decision to limit the number of units per property that can be used for short term rentals? I assume that I'm overlooking something because it seems unlikely that the city would choose to limit a new source of revenue without good reason.

Thank you for considering my comments.

**City of St. Paul Planning Commission
June 2, 2017 Short-Term Rental, Public Hearing**

**Pam and Cory Biladeau
Corban Manor Inn~Bed and Breakfast
96 Virginia Street
St. Paul, MN 55102**

Madam Chair and Commissioners, my husband Cory and I are residents of Saint Paul, as well as licensed Bed and Breakfast owners; and want to thank the Planning Commission for the opportunity to speak.

Based on a study conducted by the city of Saint Paul, there are approximately 250+ unlicensed rental properties, which the city has deemed “illegal” rentals. We applaud the city officials for recognizing this, and agree with their designation. We are here in support of the Department of Safety & Inspection’s mission of: ***“To preserve and improve the quality of life in Saint Paul by protecting and promoting public health and safety for all.”***

We absolutely love Saint Paul and are both personally and financially committed to the health and safety of our neighborhood. While we are not able to make a living from our licensed Bed and Breakfast (BnB), we do feel that it provides a wonderful amenity to the neighborhood.

It is unclear what short-term rentals (STRs) offer that is different from what is already being provided by the licensed lodging industry—and the need for creating the proposed language. In fact, the current laws offer several tiered licensing levels.

- 1) **Federal Laws already allow for STRs during large events like the Super Bowl**, where home owners can rent up to 15 days a year tax-free--thereafter they are considered a business.
- 2) For those ‘that want to make a little extra money,’ renting one bedroom is a very easy process and does not even require a CUP; nor is it expensive.
- 3) Renting more than one bedroom has a larger impact on a residential neighborhood and currently requires a CUP process so residents have input on businesses opening next door.
- 4) There is also an option to request a variance.

The only real difference in the proposed language, compared to the current laws, is that it will allow residential neighborhoods to unabatedly become business districts without input from neighbors living next to a hotel.

GAPS IN THE PROPOSED LANGUAGE

The proposed language also requires licensing on-line rental platforms (ex. Airbnb). However, even if the city is successful in creating a contract with Airbnb (and the other 15 or so on-line short-term rental platforms) to share information about who is renting; this will not capture the tax revenues for those guests who connect with hosts and rent directly (allowing both guests and hosts to avoid the 3-18% fees charged by on-line platforms). It also seems unrealistic that it will be possible to create an agreement with ALL rental platforms.

FAMILY OCCUPANCY DEFINITION

We strongly urge the council to not approve the proposed language; but rather decide what is truly different about STRs and adjust language. Our observation is that the proposed language redefines lodging rentals as residential lodging, rather than a business. The justification is that if rooms are being rented in a residential home, they are somehow not a business and fall under “Family Definition”.

*Note: Family Occupancy definition does not limit the number of guests or guest rooms--**Think “19 Children and counting”!** Although we are told that the family definition can only be four adults—this is a misnomer, and **omission**, of what this language really means; because in addition to the four adults, it allows their grown children, their grown children and their children. HOW CAN THIS POSSIBLY BE REGULATED?

There is an argument that STR traffic would be the same as if a family lived in the home. The difference is that our neighbors know the people that they are inviting into their home and I can’t think of a single neighbor that have guests every night, or even very frequently.

If this will not be considered we ask the proposed language not be passed without addressing the following:

- 1) Not approving the family occupancy definition* (which would be impossible to regulate), but instead quantify the number of guest rooms and number of occupants for each bedroom based on square footage.
 - 1a) Define the exact number of guests allowed per home based on parking and other congestion issues.
 - 1b) Block large investment groups from destabilizing a neighborhood with transient properties.

What recourse do neighbors have to complain about increased traffic associated with this type of business lodging? Our concern is that there will be no recourse for the residents because the STRs will be in “compliance” and there are very few restriction. We are concerned this will put the city in the position of not being able to do anything because “they are in compliance”.*

FAIR PLAYING FIELD

The proposed language is not simply an unfair playing field--it is unjust. We made our business plan based on current licensing laws, permitted use and zoning (which requires licensed BnBs to be 1,000 feet apart).

The reality is that most of the licensed BnB owners in St. Paul work other jobs or have retired and have supplemental income. Current BnBs are limited to four guest rooms because residential neighborhoods are not intended for large lodging enterprises. The lodging industry states it takes at least ten guest rooms to make enough money to adequately serve as a primary income. If we needed more money we would have chosen a different business model we would have chosen a different location (i.e., business district).

We believe the city has an obligation to protect their residents and uphold the current lodging laws, permitted uses, zoning. While STRs are a business, they have not been, nor will be held to the same standards in the proposed language as licensed lodging businesses. We love our neighborhood and St. Paul—we are proud to share and showcase its, beauty, history and unique character with visitors. We

do not believe it is in the best interest of our residents and visitors to lower the current regulatory standards, licensing requirements, permitted use or zoning.

Short-term rentals are nothing new! The only thing new about the “new economy” is that it is an underground economy where laws, permitted uses, and zoning are blatantly not followed—most don’t follow employment laws, pay the 10.625% taxes, fees, or buy business insurance. We were literally laughed at by STR owners who simply couldn’t figure out why we followed the law!!! We explained, that we thought it was the bedrock of society and that it was illegal to not follow the law. Even with this explanation, they couldn’t understand because they couldn’t imagine regulators will be able to make them comply.

Case studies show that lowering standards achieves minimal compliance. For example, prior to the settlement agreement, San Francisco had required hosts to “register” with the city, however only 2100 of the 8000+ had done so. Other cities such as Charlotte NC have had a similar experience.

Furthermore, one STR owner in a public meeting said that she didn’t care what the city decided, she was going to continue to rent out her five bedrooms.

We object to the unjust and disproportionate advantages being given to unlicensed STRs—we have been held to the highest interpretation of laws while going through the CUP process, paid 10.625% lodging and related taxes, business insurance, ordinances and employment laws—that were without distinction of our small size! It appears from past actions, and based on the lack of success by others states, that even when regulatory standards are lowered, or removed, many STRs will be unwilling to follow the laws.

Therefore, we are for the same opportunity to make a living as in the proposed STR language by automatically grandfathering the following language for currently licensed bed and breakfasts:

- 1) Increasing the number of bed rooms from four to ten (including accessory buildings).
- 2) Allow residential parking to be clearly designated as residential for code compliance (rather than commercial requirements).
- 3) Allow unlimited numbers of employee hires.
- 4) Continue to designate BnBs as residential for code compliance.

PROOF THE PROPOSED LANUGAGE IS NOT NEEDED

We have heard many emotional statements about the benefits of short-term rentals. Each and every one of these arguments can be answered by asking the question: WHAT DOES THIS HAVE TO DO WITH NOT FOLLOWING THE LAW? Since, licensed BnB owners have the same concerns and provide the same lodging services as unlicensed STRs, these “I can’t follow the law because” arguments just don’t hold up and consist of everything from:

- I’m not following the law because: I couldn’t afford my current house I have if I followed the law.
- I’m not following the law because: I want to be free to do the type of work I want to do.
- I’m not following the law because: I need the money.
- I’m not following the law because: I should be able to do what I want with my home. (Try opening a liquor store in your bedroom.)

- I'm not following the law because: I have health issues.
- I'm not following the law because: I already pay property taxes on my home. (It's not a business.)
- I'm not following the law because: I support visitors to spend money in the area.
- I'm not following the law because: I serve as ambassadors to visitors, especially those from other countries.
- I'm not following the law because: I offer a unique experience from hotels (so do licensed BnBs).
- I'm not following the law because: I keep my yard picked up, mowed, house painted and make improvements. (Seriously, you're using the threat of not following yet another law as a bargaining chip as to why you are not following the lodging laws?)
- I'm not following the law because: Summit University has a lot of money and we don't. (Really? Many of the residents bought their homes in the 70's and fought to create the beautiful neighborhood we have today. Interestingly many of the STR who have testified own homes that are more expensive than ours!)
- I'm not following the law because: I didn't save money (because in another business, and I followed employment laws and paid employees well.)
- I'm not following the law because: STR traffic would be the same as if a family lived in the home. **(The real difference is that our neighbors know the people that they are inviting into their home and I can't think of a single neighbor that has different guests or a party every night, or even very frequently.)**

MULTI-PROPERTY INVESTMENT GROUPS

We are concerned about the non-owner occupied, multi-property STRS:

- Multi-property owners make up six percent of the hosts on Airbnb, but bring in 40 percent of Airbnb's revenue. In other words, a lot of the hosts on Airbnb and other rental platforms are large multi-property investors.
- Members of the Vacation Rental Alliance of Minnesota have a \$15,000.00 "International Service Provider Membership". (Compared to Minnesota Bed and Breakfast Association whose maximum membership is \$700 for members with 50 rooms or more). This is not your "just trying to make a little extra money" group.

CONCLUSION

We ask the city to please consider using the current licensing laws, permitted use and zoning--with the exception of allowing an option to not serve breakfasts.

Thank you for your consideration of these requests and opportunity to give input.

June 5th, 2017

Regarding: Short Term Rentals in the City of St. Paul
To Whom It May Concern:

Hello, I'm writing today, as a 20+ year owner of a duplex regarding the proposed changes/concerns to short term rentals in St. Paul, and as an enthusiastic proponent of short-term rentals.

I have read the Short Term Rental Study prepared by Kady Dadlez, and I am all for licensing, inspections and paying our fair share of taxes but I would like to strongly urge the City of St. Paul to allow 100% short-term rentals in buildings up to 4 units. I currently only rent out one side of my duplex on a short-term basis but would like to have the option to rent out both units on a short-term basis, should we decide to do that. It has been a very successful business model and, I believe, it's been beneficial for the City of St. Paul too.

Since 1995, my husband, Rudolf Bachofner, and I have owned and occupied our duplex in the Summit Hill neighborhood of St. Paul. We have continuously rented out one side of our duplex since 1995. We have always treated this rental property as a business, and filed and paid all applicable taxes on the rental income, including sales tax.

From 1995 until 2014 we had long-term renters with a minimum rental period of not less than one year. Having been landlords for more than 20 years, we've experienced the full gamut of renters so I believe we are qualified to note the pros and cons of long-term vs. short term rentals.

Starting in 2014, we began renting on a more short-term basis, utilizing VRBO.com. It has been a wonderful experience for us, both financially, and, more importantly, in terms of wear and tear on our property: much less! For me, as a long time Realtor, it's been a great, complimentary business model and I take it very seriously, it's not a hobby. Please see our reviews: <https://www.vrbo.com/3671319ha>

The vast majority of our guests are 50+ years old, retired and visiting St. Paul to spend time with their adult children and grandchildren. The other, small percentage of guests are parents attending various events at Macalester or other colleges in the area. It's rare that we get guests who just happen to be flying into St. Paul as random tourists. Our guests are quiet, respectful, follow our house rules and **spend a lot of money** while in St. Paul dining and shopping on Grand Avenue. They all love it here!

Long-term vs. Short-term: There are definitely pro's and cons to both models. Having experienced both long-term and short-term rentals, I absolutely prefer the short-term rental model. It is a considerable time commitment and expenses are much higher than with long-term renters, but the relative lack of wear and tear with our short-term renters plus the flexibility of rental periods make it a superior choice for us.

We hope that the City will decide to allow 100% rentals in buildings up to 4 units.

Thank you for your consideration.

Elizabeth Day

1188/1190 Lincoln Avenue

St. Paul, MN 55105

eday@centurylink.net or 612-790-6022

Dadlez, Kady (CI-StPaul)

From: Jane McGrath <mcgrath.jane.50@gmail.com>
Sent: Monday, June 05, 2017 4:27 PM
To: Dadlez, Kady (CI-StPaul)
Subject: Short term rental & Zoning amendments

Kady,

A few comments/considerations for the short term planning work.

Background - I live and own a duplex at 599/601 Portland Ave for over 25 years. I have always rented out one unit in the duplex, usually to long term, as short as 1 year, as long as 15, during this time. I am looking to do vacation/visitor rental for a couple of reasons, but the primary reason is to introduce visitors from around the country and the world to my great neighborhood and town. Ever since I moved to St. Paul, over 30 years ago, I have been in love with St. Paul. I have introduced visitors, friends, and outside guests to my city and always have suggestions on where to go and what to do. Offering my home as a base for those visitors makes it even more personal and will allow me to promote my neighborhood commerce.

Thoughts:

- Zoning - It does not make sense to change current residential property to commercial zoning when these have always been residential rental/owner properties. I think it could open up a different type of commercial use that my neighbors would not appreciate when I leave.
- Inspections - I think it would be appropriate for any rental property to be inspected.
- Neighbors - I have personally spoken with neighbors around my property and they have given positive feedback, including making suggestions on how to promote the rental.
- Short term rental - the duration of the rental appears to be somewhat arbitrary. If I have 3 tenants that move out within 30 days does that make it a "short term rental." On the other hand if I have a tenant/renter who wants to stay for 3 months, what does that make the property?

I understand the need to monitor rental properties and appreciate your work on this topic.

Thank you,
Jane McGrath

June 5, 2017

City of Saint Paul Planning Commission,

My husband and I attended the planning commission meeting June 2d. We did not speak but listened to the information presented by those who did. Thank you for the opportunity to submit our thoughts in writing.

We have owned and lived in our duplex at 1449-51 Ashland Ave for more than 40 years. We rented out the first floor unit for most of those years, but eventually decided we no longer wanted to have long term tenants. After a period of vacancy we put the unit on Airbnb and now prefer short term rentals. Our guests are either visiting family such as a Macalester student or elderly parents, or are event goers (Celtic dance competitions, college reunions, conventions, etc.). St. Paul has no hotels or motels near the central colleges and so short term rentals fill an unmet need. Our guests can invite their college students over for a home-cooked meal...not possible in a hotel or motel.

Because of the nature of their visits our guests generally spend their days away and come back to sleep. They are here for only a few days. They arrive in one car; long term tenants always had at least 2 cars. Guests are respectful of the property. Damage is virtually non-existent compared with that by even well-meaning long term tenants who spend significantly more time on the property.

We inspect the property after each guest and make any necessary repairs, a luxury we did not have with long term tenants. Our goal is to improve the property in some small way between every guest. The house, outside and in, is in better shape now than ever. All of our guests have given us 5-star reviews and that is important to us.

Someday we will likely get a "bad" guest, but the stay will end in a few days, unlike a "bad" long term tenant who could annoy us and the neighbors for a year. People who object to short term rentals because they have no say over who will be next door may be forgetting that they have no say over who will be long term tenants. We have rental property on either side of us and so have barking dogs and smokers as neighbors, neither of which is allowed in most short term rentals.

We would like to comment on just 2 regulations being considered:

- We agree that owner-occupied properties should be subject to fewer regulations.

- This is our home and we are on the property while guests are here.
- Guests with bad behavior in mind will not choose an owner-occupied property.
- We will decline a guest with poor reviews.
- The safety of our guests is our safety too. We have smoke and carbon monoxide detectors, good locks on windows and doors, outdoor motion lights, etc.
- Our property, as are almost all Airbnb properties, is smoke-free.
- Owner-occupied duplexes are already exempt from most city inspection and licensing regulations.

- Taxes should be assessed, collected from the guest and remitted to the city not by the host but by Airbnb and several other short term rental platforms as is done in Los Angeles. Hosts complete a monthly guest income form for the city which can then be mailed or submitted electronically. A copy of the front page of the form is attached.

Respectfully submitted,

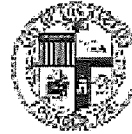
Kimball Foster and David Schreiber
1451 Ashland Ave.
St. Paul MN 55104



CITY OF LOS ANGELES

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Los Angeles CA 90030-0655

KIMBALL FOSTER
1451 ASHLAND AVENUE
SAINT PAUL, MN 55104-8707

02369

3964 HOPEVALE DRIVE
SHERMAN OAKS, CA 91403-4414

PLEASE FOLD SO THAT LOWER CITY OF LOS ANGELES ADDRESS SHOWS THROUGH RETURN ENVELOPE WINDOW

TRANSIENT OCCUPANCY TAX REPORTING FORM (HOME BASED)

ARTICLE 17 L.A.M.C.

ACCOUNT NUMBER	FUNDC/CLASS CODE	PERIOD	OUT OF BUSINESS DATE	DATE DUE	DELINQUENT AFTER
0002927763-0001-3	H022	201705M		06/01/2017	06/26/2017

THE TAX RATE IS 14 % OF TAXABLE RENTS

Please complete the following information to determine the total taxable rental income:

- 1. Total receipts from all occupancies..... \$
- 2. Allowable deductions:
 - a. Receipts collected by a City-interfaced property rental platform..... \$
(Currently AirBnB, onefinestay & AE Hospitality)
 - Less total allowable deductions \$ ()
- 3. Total taxable rental income (line #1 minus #2)..... (BASIS FOR TAX) \$
- 4. PRINCIPAL TAX DUE (MULTIPLY LINE #3 by 14%)..... \$
- 5. INTEREST (0.3% PER MONTH IF PAID AFTER 06/26/2017 SEE SECOND PAGE).....
- 6. PENALTY (5% IF PAID AFTER 06/26/2017 SEE SECOND PAGE).....

PAY THIS AMOUNT \$

PLEASE MAKE A COPY OF YOUR COMPLETED FORM FOR YOUR RECORDS. RETURN ORIGINAL WITH YOUR PAYMENT.

Payment by: Check Money Order ACH

No Split Payments

For your security, credit card payments are not accepted via mail. To pay via credit card please use our online services or visit one of our public counters. Please note that all Credit or Debit Card payments will be assessed a fee equal to 2.7% of the payment amount.

RETURN CHECK FEE - Please note that if a payment is rejected by the bank, a \$35 fee will be assessed along with any applicable interest and penalty.

Payments of \$50,000 or more require ACH

MAKE CHECK OR MONEY ORDER PAYABLE TO: Office of Finance, City of Los Angeles

Your check or money order must be drawn on United States banks only. Please write your account number on your payment

ATTENTION - PLEASE READ

Non-financial information such as name, business address (including home-based businesses), mailing address, etc., contained in your City of Los Angeles tax and permit records, is subject to public disclosure under provisions of the California Public Records Act, Government Code Section 6250 et seq. Your residential information may also be subject to public disclosure if that location is utilized for business and/or mailing purposes.

I DECLARE, UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT TO THE BEST OF MY KNOWLEDGE THE FOREGOING IS TRUE AND CORRECT.

SIGNATURE

DATE

TITLE

DAYTIME PHONE ()

IF THERE HAS BEEN A NAME, ADDRESS OR OWNERSHIP CHANGE, PLEASE COMPLETE THE SECOND PAGE AND THE FORM ABOVE, COMPUTE THE TAX FOR THE LAST PERIOD OPERATED, AND RETURN THE FORM TO THIS OFFICE WITH YOUR PAYMENT



54100113

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

All Responses sorted chronologically

As of June 6, 2017, 5:03 PM



Open Saint Paul is not a certified voting system or ballot box. As with any public comment process, participation in Open Saint Paul is voluntary. The responses in this record are not necessarily representative of the whole population, nor do they reflect the opinions of any government agency or elected officials.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

As of June 6, 2017, 5:03 PM, this forum had:

Attendees: 103

All Responses: 41

Hours of Public Comment: 2.1

This topic started on April 25, 2017, 12:47 PM.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Responses

What do you see as the benefits of short term rentals?

Answered 40

Skipped 1

able **also** benefits community **experience** families great **home** hotel **income** keep like living money **more** needed neighborhood neighborhoods offer options out **owner** paul **people** property rentals s short st stay str t **term** they time travel up visitors way which

What issues or concerns do you have with short term rentals?

Answered 40

Skipped 1

airbnb all also **any** community concern **concerned** concerns could don family from **guests** home hosts house **issue** issues like m more neighborhood neighbors noise **none** owner parking parties party **people** potential property rental **rentals** short some t term they used

What are ways to ensure that short term rentals benefit neighborhoods?

Answered 39

Skipped 2

Short Term Rental Study and Proposed Zoning Amendments

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airbnb all benefit community family guests home **hosts** income
maintain make **more neighborhood** neighborhoods
neighbors number out **owner owners** parties **paul people** properties
property **rental rentals** rules s same **short short-term** st t
term they think those way where **who**

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Melinda McElheny outside Saint Paul (registered)

June 5, 2017, 8:23 AM

What do you see as the benefits of short term rentals?

I travel to the area three weeks per year for school, and hotels are both cost-prohibitive and not conducive to study. Having a short term rental is essential to my being able to comfortably visit regularly. I feel ownership in the property at which I stay, which makes me take great care of it. I know my classmates feel the same way.

What issues or concerns do you have with short term rentals?

I have experienced no problems at all. I know that some of my classmates have ended up in rentals where the poster was dishonest, so some protections and recourse for the renter would be good.

What are ways to ensure that short term rentals benefit neighborhoods?

My own regular rentals have been in (1) apartment where the owner lived in the same structure and (2) owner is a licensed real estate agent. Having some high standards on properties and owners can ensure good renters who bring tourist dollars to the neighborhoods.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Tiffany Biedermann outside Saint Paul (registered)

June 4, 2017, 11:08 PM

What do you see as the benefits of short term rentals?

As I write this, I am currently on my eleventh stay with Sean Doyle through Airbnb. I stayed with Sean the first time in August, 2015, when I attended my first week as a hybrid law student at then-William Mitchell. Airbnb has enabled me to do what I could not otherwise afford to do--graduate law school a full year ahead of schedule. I have saved probably close to \$10,000 in hotel costs so far, freeing up spending money for eating out, shopping, and entertainment when I am here. If you have any doubts about the benefits to the neighborhood, you should take a tour of Sean's home. He has made significant updates to his home and revitalized a historic property.

What issues or concerns do you have with short term rentals?

I have two comments with regards to issues or concerns. First, I was concerned the first time I rented, but I selected someone with a Super Host designation and I am glad that I did. The Super Host designation indicates someone who takes seriously their business of providing short-term rentals. Second, neighborhood safety is always a concern.

What are ways to ensure that short term rentals benefit neighborhoods?

Have you seen the significant updates Sean has made to his home? He invests significant sweat equity and Airbnb frees up time for him to pursue his artistic interests.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Sarah Benson inside Ward 3 (registered)

June 4, 2017, 8:53 PM

What do you see as the benefits of short term rentals?

Promotes exposure and tourism for St. Paul, increases revenue for the city and income for residents. Helps with overflow during larger events. By bringing visitors to our neighborhood restaurants and shops, it increases exposure for locally owned small businesses in neighborhoods. Hosts tend to have a higher standard for short term rentals than for long term rentals, they check up on the property frequently. Hosts are motivated to maintain the quality and beauty of a property to generate high ratings.

What issues or concerns do you have with short term rentals?

I have no issues with short term rentals. There is one across the street from my home in Mac Groveland, and all guests have been respectful. I could see how parking might be an issue in some places, or how neighbors might be concerned about parties. But speaking from a landlord's perspective, I think landlords would be more worried than neighbors about the negative impact of a party as their home represents a significant financial investment and they are likely motivated to protect it.

What are ways to ensure that short term rentals benefit neighborhoods?

Congratulations to Saint Paul for resisting the temptation to over regulate based on fears of possible adverse outcomes, and instead realizing that the best regulations are based on appropriate analysis and empirical data which we as a community will acquire over time as we proceed into a future where the shared economy plays a larger role in our lives. By requiring that short term rentals adhere to the same standards as long term rentals, St. Paul is on the right path to ensuring that STRs do not negatively impact neighborhood, but instead bring revenue and exposure, and well maintained properties. Hosts should continue to make guests aware of house rules that require respectful behavior at all times, no parties, no late night noise.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Name not available (unclaimed)

June 4, 2017, 8:06 PM

What do you see as the benefits of short term rentals?

They are a great way to create visibility to the neighborhood and bring much needed income to struggling families, especially with rising taxes. Additionally it is a way that it can bring more spending to areas that are often far from the DT.

What issues or concerns do you have with short term rentals?

Only concern is that they are exploited. People with multiple locations renting only for profit.

What are ways to ensure that short term rentals benefit neighborhoods?

Create ways that neighborhoods can discuss the changing demographics and needs.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Name not available (unclaimed)

June 4, 2017, 3:44 PM

What do you see as the benefits of short term rentals?

It allows for home owners to keep up with rising living costs, taxes, etc. It provides a fall back for unexpected expenses, loss of job, etc. Keeps them out of debt and paying interest.

What issues or concerns do you have with short term rentals?

None as long as property owners wet guests properly. Short term guests are just looking for an affordable option to visit family, attend an event, or enjoy the city, not to party and cause problems.

What are ways to ensure that short term rentals benefit neighborhoods?

If the intention is to host as a business (multiple units in the same building, business owned, over 50% occupancy, etc.) it should be regulated as such. If it's just a family needing a little extra income regulations should be minimal.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

BonnieJean MacKay inside Ward 2 (registered)

June 4, 2017, 3:30 PM

What do you see as the benefits of short term rentals?

Homes in Residential neighborhoods can be kept up more easily by generating funds for their own exterior and interior maintenance. People visiting from all over the world can experience residential neighborhoods while in residence with a host, or in a home similar to the surrounding residences, thus dramatically enhancing their travel experience and allowing hosts and guests to share stories and gain cultural understanding and awareness.

What issues or concerns do you have with short term rentals?

My only concern is that the guests are screened for potential irresponsible behavior. Hosts must take responsibility for their guests, and as long as their are no tangible disruptions to the neighbors, there should be no problem with guests staying in homes among the residents of any given neighborhood.

What are ways to ensure that short term rentals benefit neighborhoods?

Limit fees that might prohibit hosts from turning the income into a viable means of maintaining and improving their properties, and thus the value of the real estate in the neighborhood. Regulation that is not warranted by any actual events or incidents should be minimized. Host homes should adhere to basic standards, and an inspection might be reasonable, but beyond that, the freedom of hosts to welcome guests should not be substantially limited. Neighborhoods where homes are put to use and occupied are more vibrant than neighborhoods with empty houses suffering from disrepair. Short-term rental hosts work hard to assure the positive experiences of their guests. This would mean they are taking good care of homes, whether they are occupying them, or only fixing them up, and maintaining them as short-term residences. The ability to earn a living while enhancing the vibrancy of a neighborhood is a win-win for everyone - the neighbors, the City, the Law Enforcement teams, the visitors, and the HOSTS!

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Penny Aguirre outside Saint Paul (registered)

June 4, 2017, 1:15 PM

What do you see as the benefits of short term rentals?

Provides a city life experience when in a home, people, can share a living space with friends, allows residents to raise their income, people may rent in a different city and the city would lose the revenue of having them visit, Homes are well maintained to entice renters, spending in city which would otherwise sit vacant,

What issues or concerns do you have with short term rentals?

None really

What are ways to ensure that short term rentals benefit neighborhoods?

Make sure that renters are supplied with house rules that respect the neighbors

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Kelli McCully inside Ward 4 (registered)

June 3, 2017, 9:59 PM

What do you see as the benefits of short term rentals?

A way for families to make extra money to cover the cost of living and high property taxes. It's a way for visitors to stay in the neighborhood and not downtown or in the burbs especially if visiting friends or family in the neighborhood, keeping their money in town and not spent at the establishments nearest those hotels.

What issues or concerns do you have with short term rentals?

Only maybe too many whole-house rentals in a given area. I think that's unlikely, actually. But for those where the owner is home? Over-regulation by the city squashing the opportunity for residents and renters alike.

What are ways to ensure that short term rentals benefit neighborhoods?

Don't over-regulate it. The systems in place through the main services take care of screening, reviews, etc. If those services are too tightly restricted, people will figure out another unregulated way to do this with more risk.

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Sarina Stone inside Ward 1 (registered)

June 3, 2017, 6:32 PM

What do you see as the benefits of short term rentals?

Short term rentals offer a travel experience that connects our global community with our city (through tourism) by allowing for a more personal and affordable travel experience. Joining our global community in offering our home to travelers also helps Saint Paul families create needed income.

What issues or concerns do you have with short term rentals?

Hosts who do not pay taxes on income or use a proper service with built-in protections for hosts and travelers could compromise our participation with the current trends of our global community.

What are ways to ensure that short term rentals benefit neighborhoods?

Use a service that helps connect hosts with guests who have been verified and have references.

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 3, 2017, 6:03 PM

What do you see as the benefits of short term rentals?

It provides passive income for folks who want to provide this type of service.

What issues or concerns do you have with short term rentals?

I'm concerned with zoning and the potential for restricting the number STRs to one per lot. Also banning STRs from providing their home for social events like weddings and graduation parties seems unnecessary.

What are ways to ensure that short term rentals benefit neighborhoods?

No response

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 3, 2017, 5:55 PM

What do you see as the benefits of short term rentals?

No response

What issues or concerns do you have with short term rentals?

No response

What are ways to ensure that short term rentals benefit neighborhoods?

No response

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Rowan Glaser inside Ward 4 (registered)

June 3, 2017, 8:22 AM

What do you see as the benefits of short term rentals?

I have used short term rentals when traveling for business. It decreases costs and lets me meet the local community, learning where to go and what to avoid.

What issues or concerns do you have with short term rentals?

That they will be regulated and no longer viable income for people who have rooms to rent.

What are ways to ensure that short term rentals benefit neighborhoods?

The property owner is already paying taxes, what other benefit is needed to those who rent out a room in their home?

Short Term Rental Study and Proposed Zoning Amendments

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Bryce Singleton inside Ward 4 (registered)

June 2, 2017, 9:43 PM

What do you see as the benefits of short term rentals?

In our neighborhood of Mac/Groveland there really isn't any hotels/motels in the area. Friends and family have to stay either downtown or most stay in Eagan, Roseville, or Bloomington.

What issues or concerns do you have with short term rentals?

I really don't have any issues if the short term rental owners live on site or close to the short term rental.

What are ways to ensure that short term rentals benefit neighborhoods?

It's bringing in more visitors to our neighborhood restaurants and shops. The money is staying in St. Paul, not going to another community. It's also having family and friends staying closer in the neighborhood for visits.

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 2, 2017, 6:35 PM

What do you see as the benefits of short term rentals?

It's great for the economy and let's visitors stay with friends and family during there stay in the twin cities

What issues or concerns do you have with short term rentals?

I don't have any concerns. Homeowners should have the right to do what they want without the government being involved.

What are ways to ensure that short term rentals benefit neighborhoods?

More visitors = more money in local businesses.

Short Term Rental Study and Proposed Zoning Amendments

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Michael-jon Pease inside Ward 2 (registered)

June 2, 2017, 5:46 PM

What do you see as the benefits of short term rentals?

More housing options in more neighborhoods for short term, budget conscious visitors.

What issues or concerns do you have with short term rentals?

On the regulation side, I'm concerned about rules and fees that outweigh the benefits for owner-occupied single room rentals. On the neighborhood side, I'm most concerned with multiple properties that aren't occupied by actual residents.

What are ways to ensure that short term rentals benefit neighborhoods?

Involve property owners and neighbors in a fair process. We've been hosts for the past year and our highly vetted guests (no more than one couple at a time in a three room suite in our home) bring economic impact and no noise, parking issues, etc. For us and our neighbors it's been a win/win.

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 2, 2017, 2:52 PM

What do you see as the benefits of short term rentals?

people can get a more personal visit to the city

What issues or concerns do you have with short term rentals?

none

What are ways to ensure that short term rentals benefit neighborhoods?

I believe the city as a whole would benefit from this option..

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 2, 2017, 11:49 AM

What do you see as the benefits of short term rentals?

Money to keep up property

What issues or concerns do you have with short term rentals?

Criminal activity

What are ways to ensure that short term rentals benefit neighborhoods?

On site proprietors or managetes

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

June 1, 2017, 11:52 PM

What do you see as the benefits of short term rentals?

Some of the benefits to the community are increased tourism and traffic for local business by referral. STR's often cover a niche that the hotel industry lacks. An additional income for many in a time when additional income is greatly needed. In my neighborhood the streets are cleaner because I pick up trash on a regular basis so as not to have a poor review because my neighbors are trashy. Owner occupied STR's are more likely to keep up on health and safety concerns based on this as well. Non STR landlords in my area often neglect their properties.

What issues or concerns do you have with short term rentals?

I am concerned that the city will impose cost prohibitive fees. I am also concerned that the proposed zoning restrictions are overly restrictive! One STR per single household? Also restrictive is the notion that Bed and Breakfasts can't have social events? What if we don't serve breakfast or any food for that matter? More like a Bed and Bath... are we then exempt and thus able to host events?

What are ways to ensure that short term rentals benefit neighborhoods?

Airbnb has a great way for neighbors to bring up concerns about trouble hosts/listing... <https://www.airbnb.com/neighbors> and they take it very seriously. I also whole heartedly agree with the person that wrote this: "I'm an owner/occupant host, St Paul should insist on owner occupancy. I provide off-street parking for my guests and maintain a quiet and respectful environment for my guests and neighbors. The additional income, which rarely exceeds what I'd be able to charge for a long-term renter, has allowed me to maintain my home in a way that makes it an asset to the neighborhood. Additionally, my guests have all enjoyed the many local commercial establishments in my neighborhood. These are all benefits of allowing owner/occupants to offer short-term rental in their home." anon

Short Term Rental Study and Proposed Zoning Amendments

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Anthony Didier inside Ward 2 (registered)

June 1, 2017, 9:06 PM

What do you see as the benefits of short term rentals?

It has provided me with some needed additional income. I could make more money having a long-term renter, but the short term rental works out much better for my personal situation. Additionally, I've been able to direct many of my guests throughout the past year to many locally-owned restaurants and stores (which my guests have enjoyed)

What issues or concerns do you have with short term rentals?

Commercial short-term rentals that aren't owner occupied are a problem. Without the monitoring an owner/occupant provides, parking, noise, and disrespectful behavior becomes a potential issue for the neighborhood.

What are ways to ensure that short term rentals benefit neighborhoods?

I'm an owner/occupant host, St Paul should insist on owner occupancy. I provide off-street parking for my guests and maintain a quiet and respectful environment for my guests and neighbors. The additional income, which rairly exceeds what I'd be able to charge for a long-term renter, has allowed me to maintain my home in a way that makes it an asset to the neighborhood. Additionally, my guests have all enjoyed the many local commercial establishments in my neighborhood. These are all benefits of allowing owner/occupants to offer short-term rental in their home.

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Jane McGrath inside Ward 1 (registered)

June 1, 2017, 8:25 PM

What do you see as the benefits of short term rentals?

It has the ability to introduce visitors to a more community based view of travel, rather than the commercial view one gets from a hotel. It can introduce them to a neighborhood, promotes the commercial business in the neighborhood, etc.

What issues or concerns do you have with short term rentals?

None as long as the property owner is held accountable for any issues or disturbances that they could have controlled in some way.

What are ways to ensure that short term rentals benefit neighborhoods?

Ensuring that the owners of the properties maintain the properties and renters are respectful of the surrounding neighbors. Surveys are expensive but maybe a periodic survey of neighborhoods where there are short term rentals and/or the surrounding business community to gauge how the rental has positively / negatively impacted the neighborhood, As with any neighborhood measuring police calls, incidents, complaints in proportion to other long term rental and no rental neighborhoods.

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Name not available (unclaimed)

June 1, 2017, 6:45 PM

What do you see as the benefits of short term rentals?

Short term rentals help home owners by providing needed income.

What issues or concerns do you have with short term rentals?

I don't have concerns.

What are ways to ensure that short term rentals benefit neighborhoods?

Typically, a homeowner is likely to keep their property nicer with the extra income to capture short term renters.

Short Term Rental Study and Proposed Zoning Amendments

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Suzy Feine outside Saint Paul (registered)

June 1, 2017, 6:51 AM

What do you see as the benefits of short term rentals?

Websites like VRBO and Homeaway are popular for a reason: this is the way the next generation wants to take a vacation, not in a mundane hotel but in a home and to experience St. Paul the way residents experience it with the modern conveniences of being a resident, not a stranger to the city. Short-term rentals also allow vacationers the opportunity to share space with their extended families and not stay in separate hotel rooms. This may hurt the hospitality industry, but this is the way the world is moving and St. Paul needs to support that.

What issues or concerns do you have with short term rentals?

I have no issues or concerns with short-term rentals. There is no downside to this issue - vacationers get an opportunity to select the type and location of home that appeals to them and homeowners can provide empty beds to those that want/need them - and I'm unclear why it's even illegal in St. Paul.

What are ways to ensure that short term rentals benefit neighborhoods?

I am not clear on why they need to benefit neighborhoods, they are a benefit to people all over the world. But if there are some that are causing issues in certain neighborhoods, there are definitely ways to regulate that. Certain restrictions could be enacted such as number of people allowed, quiet hours, parking restrictions, etc.

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Anthony Aguirre outside Saint Paul (registered)

May 31, 2017, 7:13 PM

What do you see as the benefits of short term rentals?

I see plenty of benefits for the owner, the city, and neighborhood. Everyone I know who runs STR is strict with their noise rules and does not allow parties. Most STRs have quiet time rules that align with neighborhood laws. The STR pushed the owner to maintain the house more effectively, keep it cleaner, and invest more into making the house and landscape nice. There is also a benefit to the city because you are drawing in more tourists and people who know the neighborhoods can make personalized travel plans and recommendations for the renters. The neighbors can always call the cops if there is a disturbance which would lead to a corrective action by the owner and poor reviews if not managed correctly. The owner will also be able to save more money to invest back into the economy and local businesses.

What issues or concerns do you have with short term rentals?

As long as there are clear guidelines of how to manage STRs there shouldn't be an issue with Air BnB and VRBO. The city should provide clearer expectations and people limits for a specific house and make sure the owner is managing a well kept house.

What are ways to ensure that short term rentals benefit neighborhoods?

Clearer guidelines, rules, and expectations for managing an STR. Make sure the noise laws apply and ensure they aren't renting out to too many people who are looking to throw parties. Parties should be regulated regardless of whether they are doing an STR or not.

Short Term Rental Study and Proposed Zoning Amendments

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Greg Smith inside Ward 4 (registered)

May 31, 2017, 3:38 PM

What do you see as the benefits of short term rentals?

There is an obvious financial benefit for the property owner. Beyond that however I don't see where short term rentals would have a particularly positive impact on the neighborhood. Specifically with regard to situations where the owner of the home isn't present and the entire house is rented to a group that, however well intended they may be, aren't going to necessarily be concerned with or even aware of their impact on surrounding homeowners.

What issues or concerns do you have with short term rentals?

I have no issues with single room – owner present rentals. My concern is with an entire house being rented out while the owner is away. Specifically with noise and parking issues. If someone is renting their entire house and yard to a large group of people, it feels an awful lot like a commercial transaction. I am a strong proponent of individual property rights but I have no desire to live next door to a hotel.

What are ways to ensure that short term rentals benefit neighborhoods?

I'm not sure how the current single family zoning regulations speak to this situation but I would suggest the following: There needs to be a limit placed on the number of occupants, irrespective of the size of the dwelling or the amount of bedrooms. The primary concern here is with outdoor activity and the potential for excessive noise so I would also like to see some limitations placed on the hours of operation as well as the number of additional guests that can be present for any single event.

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Jon Reynolds inside Ward 1 (registered)

May 30, 2017, 2:58 PM

What do you see as the benefits of short term rentals?

Most people I know enjoy short term rentals like Air BNB because they offer a more personalized, unique travel experience. You get to experience St. Paul's neighborhoods in a way that you're unable to when staying in a conventional hotel. You get to meet interesting people who can point you to great local destinations that might fly under the radar. They offer safe, comfortable accommodations on a budget.

What issues or concerns do you have with short term rentals?

No concerns when used through conventional sites like AirBNB and VRBO

What are ways to ensure that short term rentals benefit neighborhoods?

Provide neighborhood guides for free, so that AirBNB hosts are able to give easy and clear tips for where to go and how to get around. Walking guides, winter weather guides, "best kept secrets" guides ... those would be really fun and would make a big impact!

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Jenny Kramm inside Ward 1 (registered)

May 30, 2017, 2:36 PM

What do you see as the benefits of short term rentals?

Use the extra space in the neighborhood, generate necessary income for residents struggling with high property taxes to help them keep up with their mortgages, expose tourists to St. Paul

What issues or concerns do you have with short term rentals?

I've heard few concerns about AirBNB, but don't know anything about other options for short term rentals.

What are ways to ensure that short term rentals benefit neighborhoods?

Don't over-regulate it. People that are renting their house have plenty of other things to think about (cleaning their space, talking with their neighbors that they are doing it, keeping on top of inquiries, and making guests feel welcome). It will leave spaces unused and property owners interested in moving outside of the cities if they can't make it financially feasible to maximize unused space in their home that they are getting taxed on. If any regulation is needed, make it super easy, like a checklist on the St. Paul website and have an easy to register process online for homeowners to fill out a 3 question online postcard informing officials it's happening.

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Kathleen Dickinson inside Ward 4 (registered)

May 29, 2017, 1:29 PM

What do you see as the benefits of short term rentals?

I think it sounds like a great idea when I want to go stay in a different city for a few days with a larger group to save on money (although I never have so far) but I realize that I have never considered the neighbors perspective until it has impacted me. A way for people to get extra income occasionally when they are out of town or if they have an extra bedroom. If they are living in the home at the same time they have more control over how the home is used. It especially makes sense to me for busy times for the city, like when the Superbowl comes and there isn't enough housing.

What issues or concerns do you have with short term rentals?

I live in a neighborhood that I love and I so enjoy my neighbors and the community we have. I enjoy sitting out in my backyard and hanging out with friends and neighbors. We understand that people will have parties and make noise but that is not most weekends and often the neighbors are even included. Short term rentals have the risk of people coming to party and make noise without taking the neighbors into consideration, especially when they are large homes with many people that are not related and dont have any commitment to the neighbors. I especially have concerns when the short term rentals are being used for commercial or large social events.

What are ways to ensure that short term rentals benefit neighborhoods?

The requirement of a family unit with no more than 2 unrelated parties or 4 total unrelated parties be upheld and strictly enforced. otherwise these short term rentals can become places for partying in a residential neighborhood. If homeowner's are in the residence at the same time. Regulations should be enforced and commercial events should not be allowed unless a permit is obtained.

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Shelly Campbell inside Ward 2 (registered)

May 26, 2017, 9:16 AM

What do you see as the benefits of short term rentals?

Short term rentals essentially regulate the upkeep of neighborhoods. How so? If a STR owner wants good reviews on their property, they need to continually keep the property well-maintained and clean—inside and out. This is a heckuva lot more than most long-term landlords even begin to put into their properties (and yes, even some "regular" homeowners...).

What issues or concerns do you have with short term rentals?

Folks that are in the business of STR need to make sure they screen their renters for potential parties. And yes, if there is a problem with a renter, neighbors need to call the police—just as they would with any disturbance in their neighborhood. Eventually, if the property has too many poor reviews, it won't be rented.

What are ways to ensure that short term rentals benefit neighborhoods?

Maybe cap the number of rentals/ square mile? (disclaimer: I run a STR, and yes, I do believe in community. I wouldn't want a STR run in every other house on my block—but the few that do exist greatly benefit the visiting relatives of neighbors in my hood).

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Richard Jones inside Ward 4 (registered)

May 22, 2017, 3:15 PM

What do you see as the benefits of short term rentals?

Can provide a residential option for in town families to house out of town family members.

What issues or concerns do you have with short term rentals?

If short term rentals evolve to a consistent pattern, every weekend or several weeks a month, I feel this could affect balance of the residential community not renting and create ill will amongst neighbors.

What are ways to ensure that short term rentals benefit neighborhoods?

I would like to see Zoning remain the same and controls put in place to limit rentals to a certain # of weekend or weeks a year or possibly a certain \$ amount of rent that would be taxed by the city. Perhaps the \$ limit could be limited to the amount of taxes paid on each property.

Short Term Rental Study and Proposed Zoning Amendments

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Jackie Reeves inside Ward 4 (registered)

May 21, 2017, 10:46 PM

What do you see as the benefits of short term rentals?

I think there are financial benefits to the property owner. I also think there can be city-wide benefits when short-term rentals are available to support large events like a city hosted Super Bowl or political convention.

What issues or concerns do you have with short term rentals?

I am most concerned with having a home close by that doesn't have consistent occupancy and is primarily used as a "hotel" type dwelling. In my neighborhood, I am seeing a home being used as a large group rental, primarily used for parties. The renters are on vacation and want to have a good time but the neighboring houses are filled with people that need to sleep and go to work and school the next day. I'm also concerned with the lack of on-street parking in front of our houses. We all expect our neighbors to have parties occasionally and understand that parking won't be easy on that day, but to consistently have trouble would negatively impact our neighborhood.

What are ways to ensure that short term rentals benefit neighborhoods?

I think short-term rentals need to be regulated. I would recommend if in a residential neighborhood, the number of rentals per year be restricted. I'm not sure what the right answer is - but it shouldn't be very often and if the owner wants it to be more, they should have to get neighbor approval. I do think supporting events like hosting the super bowl with the availability of short term rentals makes a lot of sense. I also think the definition of short-term rental needs to be fully defined. I might feel differently about a short-term renter that is renting a property for 6 months compared to a renter that is renting for a night or a week. I think the use of the property is very different depending on the length of time the property is rented.

Short Term Rental Study and Proposed Zoning Amendments

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Charles J (Chip) Michel inside Ward 4 (registered)

May 19, 2017, 10:07 AM

What do you see as the benefits of short term rentals?

I do believe that one should be able to do with their home what they wish as this is America. The idea of someone able to supplement their income, defray expenses and potentially meet people from other areas and walks of life is all positive.

What issues or concerns do you have with short term rentals?

I have deep concerns and reservations on the possibility of short term rentals, if they are not strictly controlled, diluting the goal of a single family residential family neighborhood. The requirement of a family unit with no more than 2 unrelated parties or 4 total unrelated parties be upheld and strictly enforced. otherwise these short term rentals can become party homes. Short term rentals should not be allowed unless the homeowner is in residence. Non resident short term rentals are no more than hotels and should be governed as such.

What are ways to ensure that short term rentals benefit neighborhoods?

Keep current enforcement of R1R4 single family zoning rules in force. Define clearly as to how many individuals can be rented to in a single day. Right now the way I read the rules is no more than 4 unrelated people. But I am just a citizen and not an expert on these matters. That it also be stipulated very clearly that the short term rental is for Bed & Breakfast only. Short term rentals that include bridal showers, stag events, family reunions and on & on turn the situation into a commercial entity. This type of activity will be a source of agitation to other neighbors and undermine the solidarity of knowing and caring about the neighborhood and it's residents.

Short Term Rental Study and Proposed Zoning Amendments

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Addy Free inside Ward 4 (registered)

May 9, 2017, 12:41 PM

What do you see as the benefits of short term rentals?

Short term rentals can, under ideal circumstances, provide homeowners and renters flexibility and encourage excellent maintenance and improvements to property interiors and exteriors. It also can provide flexible options for visitors. Convention accommodations are often located outside of neighborhoods where expensive options are well-connected and affordable options are located in transit deserts. Short term rentals, such as Airbnb, afford better located options for visitors.

What issues or concerns do you have with short term rentals?

If properties are used exclusively as short term rentals it is difficult for neighbors to develop community with those at that property. And not all short term rental hosts and guests are equal in quality and concern for community. These as justified concerns and could be addressed in a well-considered ordinance revision. In places like Duluth, the ordinance put in place is so restrictive that short term rentals are not viable for the average user; severely limited access to the option for homeowners or renters is a potential issue of equity. Airbnb and other short term rentals can also be a force that pushes people from their neighborhoods when neighborhoods become too popular with visitors. This is more common in dense, tourist driven cities.

What are ways to ensure that short term rentals benefit neighborhoods?

Limiting the number of days in a year that a short term rental can exist in a property would significantly mitigate the issues or concerns I think are most common and justified. Providing neighborhood support for local attraction brochures that are easily accessible to short term rental providers and optimized for search engines would help drive visitor business to local businesses. "Staying in a Hamline-Midway Airbnb while visiting your daughter at Hamline? Check out Fasika or Turf Club!"

Short Term Rental Study and Proposed Zoning Amendments

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Name not available (unclaimed)

May 4, 2017, 10:03 PM

What do you see as the benefits of short term rentals?

Tourism, community and business support, property value increases with awareness and sharing of hip places, affordable travel options, people connecting.

What issues or concerns do you have with short term rentals?

Irresponsible homeowners or rental properties would have to be dealt with; homestead houses that are fulltime rentals is an epidemic in St Paul and it destroys stability in communities, NOT airbnb hosts necessarily.

What are ways to ensure that short term rentals benefit neighborhoods?

Thank you for championing this and actually caring about the opinions of those of us who have hosted! Such an amazing world we live in with these opportunities to get a REAL feel for place and community! I'm ok with minimal regulation. Maybe permitting for those who run it "like a business;" i.e. taking in more than say \$7,500/yr. We want to encourage homeowners who open their homes out of adventure, curiosity, love of travel and people, and their community to still participate in airbnb but permit or tax those who are just in it for sole income or "rental" property.

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Svein Berg inside Ward 1 (registered)

May 3, 2017, 10:56 AM

What do you see as the benefits of short term rentals?

Ability for property owners to rent their properties while away, or when a long term rental agreement is not a good fit. Ability for visitors to experience living in St. Paul for a short time in a personal setting. Short term rentals encourage the property owner to pay attention to their property.

What issues or concerns do you have with short term rentals?

I think short term rentals can have a bad rep from properties in "Party destinations", where short term rentals equal noise and disturbances. My experience with short term rentals in St. Paul is that it is mostly families and responsible adults who consider staying in a short term rental instead of a hotel.

What are ways to ensure that short term rentals benefit neighborhoods?

If needed, a permit system can limit concentration of short term rentals in a neighborhood. There should be a way for residents to voice their issues if they arise.

Short Term Rental Study and Proposed Zoning Amendments

Saint Paul is studying short term rentals and considering how to more effectively regulate them, as they are currently illegal under Saint Paul zoning code. Share your thoughts in this short survey to help inform the City's work.

Name not available (unclaimed)

May 3, 2017, 9:34 AM

What do you see as the benefits of short term rentals?

More dollars brought to the community

What issues or concerns do you have with short term rentals?

None

What are ways to ensure that short term rentals benefit neighborhoods?

Relationships between local businesses to promote spending locally

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Sarah Caffarello outside Saint Paul (registered)

May 2, 2017, 10:04 PM

What do you see as the benefits of short term rentals?

More bang for your buck. 3 separate bedrooms, a full kitchen, finished basement and a nice yard for about the same price as a hotel room!

What issues or concerns do you have with short term rentals?

None. We've had nothing but nice and responsible people

What are ways to ensure that short term rentals benefit neighborhoods?

Keep the per night fee fairly high. The purpose of a VRBO rental is to get more for your money-- not to get something for cheap!

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Lucas Schuster outside Saint Paul (registered)

May 2, 2017, 8:58 PM

What do you see as the benefits of short term rentals?

An opportunity to share a great experience with the visitors of the city

What issues or concerns do you have with short term rentals?

Taxation is challenging to comply with on Airbnb

What are ways to ensure that short term rentals benefit neighborhoods?

Effective licensing and inspection through state lodging

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Name not available (unclaimed)

May 2, 2017, 8:23 PM

What do you see as the benefits of short term rentals?

Its a wonderful way to experience the city in a real and authentic way

What issues or concerns do you have with short term rentals?

None really.

What are ways to ensure that short term rentals benefit neighborhoods?

When they are booked through reputable websites, VRBO, Airbnb, Home Away, ect quests are thoroughly vetted so I think that eliminates the need for city involvement.

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DeAnna Racquel inside Ward 6 (registered)

May 2, 2017, 8:19 PM

What do you see as the benefits of short term rentals?

It provides a different option to our travelers. Most of my guests are relocating to the area, getting medical care or on extended work assignment. They get more space and privacy at a better price than hotels can offer. Bed and breakfasts simply can't offer the amenities that this demographic needs. (full kitchens, living spaces, private parking etc.)

What issues or concerns do you have with short term rentals?

I worry about some rentals that are modified basement space as far as egress and other safety issues.

What are ways to ensure that short term rentals benefit neighborhoods?

Responsible owners. Owners need to vet their tenants and take responsibility for the element they bring into their neighborhoods. Problem owners should be warned and shut down if necessary.

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Name not available (unclaimed)

May 2, 2017, 4:15 PM

What do you see as the benefits of short term rentals?

Supplement income to homeowners with free space and time

What issues or concerns do you have with short term rentals?

None we love them

What are ways to ensure that short term rentals benefit neighborhoods?

They keep neighborhoods vibrant and desirable and help with homeowners to update their exteriors and maintain their homes to higher standards when renting to others.

Short Term Rental Study and Proposed Zoning Amendments

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Renee Spillum inside Ward 4 (registered)

April 27, 2017, 7:40 PM

What do you see as the benefits of short term rentals?

I believe short term rentals for owner occupied single family homes could be a mechanism to help families stay in areas where prices are increasing, in a much more feasible way than the accessory dwelling unit policy would.

What issues or concerns do you have with short term rentals?

The above benefit would only be achieved if fees are kept low. Perhaps a different fee for non-owner occupied would be appropriate. I would consider doing short term rental at my house, and would want to comply with all taxes, but a \$650 fee like the one in Duluth cited in your report would be prohibitive for our family.

What are ways to ensure that short term rentals benefit neighborhoods?

I think it benefits neighborhoods to allow homeowners to stay in place, even as taxes rise, to take advantage of the improving neighborhood around them. Short term rentals are one way to accommodate that with very little up front expense to the homeowner. Noise, overcrowding, etc, are already illegal. Condo associations can make rules preventing short term rental if they become a problem in a building, which seems outside the city's role. I say, collect the taxes by making it easy and simple to comply.