

## **ALTERNATE LANGUAGE SUGGESTED FOR SAINT PAUL REGULATIONS...**

1. The current proposal **limits the number of units** in a multi-unit building, rather than the number of units per host.
  - Regulating a host based on his/her neighbor's decisions is fundamentally unfair. If two occupants in a four-unit building received permits but only hosted for one weekend (say, Super Bowl), they would preclude their neighbors from hosting legally the rest of the year.
  - Home sharing usually happens at the unit level, not the building level. This proposal would require hosts in multi-unit dwellings to track what their neighbors are doing, and would be confusing for both hosts and the city.
  - **We suggest limiting the number of city permits each host may have to four unless they receive a conditional use permit.** This would address the city's concern that entire buildings would be 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 simplify the process for having one clear standard for all hosts, regardless of what building they live in.
2. Draft regulations have an **off-street parking requirement**: 1 space per dwelling unit, and 1/2 space per 2 adult guests.
  - Short-term renters have fewer, not more, cars than owners or long-term renters.
  - Even given a relatively narrow lot, three cars can easily park in front of a house without encroaching on neighbor's lots.
  - Suggested alternate language: **"There should be a combination of on-street parking directly bordering the property and off-street parking available to accommodate all owner and guest vehicles."**
3. Draft regulations propose a **Certificate of Occupancy requirement** for non-owner occupied dwellings. This is an expensive and time-consuming process—a barrier for potential hosts taking care of property that may otherwise be vacant for part of the year. Example: adult children taking care of elderly parents' property while they are away for the winter. **We suggest not having the COO requirement, but instead limiting the number of properties that a host can have to four**, and applying stronger permitting after that number.
4. Draft regulations prohibit **"social or commercial events."** We share the goal of ensuring that no wild parties or other annoying events occur, but this regulation is unclear. Example: if a guest invites a couple of friends over for dinner, with approval from the host, does that qualify as a "social event?" Suggested alternate language: **"There should be no loud or otherwise disturbing events occurring at STRs that interfere with the ability of neighbors to peacefully enjoy their residences."**