



October 3, 2017

Councilmember Dan Bostrom
310-C City Hall 15 Kellogg Blvd. West
Saint Paul, MN 55102

Dear Councilmember Bostrom:

Thank you so much for allowing us the opportunity to comment on the City of Saint Paul's proposed short term rental (STR) zoning amendments.

As you develop the short-term rental proposal, we urge you to ensure the rules are easy to follow for Saint Paul property owners who are eager to be responsible partners as Saint Paul welcomes guests from all over the world during the Super Bowl and throughout the year. We have specific comments on three items:

- **Building type limits.** We understand the concerns of having higher density of STRs within one building. However, the current proposal is cumbersome. As an alternative to the four permits per building, you can achieve a similar objective by limiting the total number of STR permits to four (4) per person.
- **Occupancy limits.** While the vast majority of short-term rental visits are less than five (5) visitors, you will likely see a tourism growth opportunity as Saint Paul is able to increase its destination profile during the Super Bowl. We recommend considering a fixed maximum occupancy limit that hosts can easily comply with and that can accommodate families traveling together, such as "2 persons per room + 2 persons, but no more than 10."
- **Platform requirements.** We hope to work with the City to ensure compliance among our host community. However, the current platform license requirements would violate federal law, and obstruct Airbnb's ability to work collaboratively with the City. 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. 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. We are willing and eager to discuss how we can work together to address bad actors.



We appreciate the transparent and practical approach you and the city staff have taken to create the best regulatory system possible for residents, businesses, and communities. 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