

October 3, 2017

12 Crocus Hill  
Saint Paul, MN 55102

Office of the City Council  
310 City Hall,  
15 Kellogg Boulevard West  
Saint Paul, MN 55102

Saint Paul City Council Members:

We appreciate the effort that has been made to date regarding the proposed zoning amendments which would define short-term rental usage and establish zoning standards. Below are our comments regarding the proposal:

1) Definition of Family

The current proposal to use the standard city definition of "Family" to limit the number of renters is troublesome. For a long-term rental it is easy to identify landlords/renters who are violating this provision. However, it is not at all easy to do so for a short-term rental. The guests are not present long enough for the violation to become apparent to the public.

We request the amendments limit the number of renters to 4 per unit, or however many are allowed based on the number of off-street parking spaces provided, whichever is less.

2) Safety Inspections

For the safety of guests, short-term rentals should require the same level of inspection as long-term rentals. Safety threats are not diminished by the frequent change over of tenants.

We request that egress windows, smoke and fire alarms, fire escapes, wiring and plumbing should all be inspected, and brought in line with current code requirements.

3) Comparison to Bed & Breakfasts

The discussion of the proposed zoning amendments, has considered a short-term rental to be a less intensive use than a Bed & Breakfast. In practice,

they are not much different. For example, some of the Airbnb properties currently operating in Saint Paul serve breakfast.

We request that short-term rentals either be subjected to the same regulations as a Bed & Breakfast, or limited to substantial few renters.

4) Density

The proposed amendments would allow entire neighborhoods to become predominantly short-term rentals.

We request there be a limit on short-term rental density by requiring a separation of at least 1000 ft between units.

5) Enforcement

Enforcement of the zoning ordinance will be nearly impossible for the city. This will force the responsibility onto neighbors, creating substantial conflict within the community.

We request the rental platforms, such as Airbnb, be required to enforce the relevant ordinances as is done in other cities. This will save the city money, and prevent neighborhood conflict.

6) Limit on Days Rented

The proposed amendments would allow short-term rentals to effectively operate as hotels.

We request a limit be placed on the total number of days a unit may be rented per year. This could be 90 days (~25% of the year).

7) Rezoning

The proposed zoning amendments effectively eliminate single family residential zoning from Saint Paul.

We request that short-term rentals only be allowed in areas currently zoned for multi-unit dwellings.

Thank you for your consideration.

John and Ann Norton