

HALIFAX

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Item No. 11.1.20
Regional Council
September 22, 2020

TO: Mayor Savage and Members of Regional Council

SUBMITTED BY:

Original Signed by 

Jacques Dubé, Chief Administrative Officer

DATE: August 26, 2020

SUBJECT: Case 22423: Regulation of Short-Term Rentals

ORIGIN

On May 16, 2019, the following motion of the Community Planning and Economic Development Standing Committee was put and passed:

THAT the Community Planning and Economic Development committee request a staff report to consider the creation of by-laws designed to regulate, and address concerns related to Short term rentals in residential areas by;

- 1. Doing a jurisdictional scan to understand how other municipalities have regulated the short-term rental industry, including exploring models such as the tiered Fees/Registration and "Density" limits models in U.S jurisdictions*
- 2. Creating a resident survey to understand the impacts of short-term rentals*
- 3. Engaging the short-term rental industry to understand any impacts regulations may have on them, and work with the Province of Nova Scotia to discuss the Assessment Act and impacts this will have on short term rentals.*

LEGISLATIVE AUTHORITY

Halifax Regional Municipality Charter (HRM Charter), Part VII, By-laws:

*"188 (1) The Council may make by-laws, for municipal purposes, respecting:
(f) businesses, business activities and persons engaged in business;"*

*Halifax Regional Municipality Charter (HRM Charter), Part VIII, Planning & Development
Halifax Regional Municipality Marketing Levy Act, 2001, c. 51*

RECOMMENDATIONS ON PAGE 2

RECOMMENDATION

It is recommended that Halifax Regional Council suspend the rules of procedure under Schedule 3, the Community Planning and Economic Development Standing Committee Terms of Reference of Administrative Order One, the Procedures of the Council Administrative Order, and direct the Chief Administrative Officer to:

1. Initiate a process to amend the Regional Plan and all applicable secondary municipality planning strategies and land use by-laws to establish consistent regional wide policies, definitions and regulations for short-term rentals in residential areas consistent with the direction set out in the Discussion section of this report;
2. Develop short-term rental registration requirements consistent with the direction set out in the Discussion section of this report;
3. Follow the public participation program for municipal planning strategy amendments as set out in the Community Engagement section of this report; and
4. Request the Mayor write a letter to the Province to request the required amendments to the *Halifax Regional Municipality Marketing Levy Act* to enable the Municipality to apply the marketing levy to operations consisting of less than 20 rooms or rental units.

EXECUTIVE SUMMARY

Short term rentals (STR) are temporary overnight accommodations rented out by property owners or tenants, typically for a few nights or weeks. Over the past few years, the prevalence of STRs have grown through the popularity of online platforms such as Airbnb, VBRO and HomeAway. In May 2019, the Community Planning and Economic Development Standing Committee (CPED) requested a staff report that considers the creation of a by-law to regulate STRs. Key information provided in this report that responds to this request includes:

- the results of an on-line survey, which collected 3,828 responses from both residents and STR hosts, and highlighted concerns with impacts on rental housing and neighbourhoods, and the importance of STRs as a source of income;
- the results of a detailed jurisdictional scan, which highlights the importance of establishing registration/licensing requirements, together with consistent land use planning policies and regulations;
- the feedback received from the STR industry, traditional hotels, and provincial government departments; and
- discussion about the impacts of STRs on housing availability and affordability, neighbourhoods, tourism and health and safety.

While the unprecedented impact of COVID-19 on HRM's tourism industry is expected to significantly reduce the number of STR stays and available listings in the short-term, it is not yet clear how severe or long the impacts will last. Given that STRs can quickly be re-listed, and the assumption that tourism activity will rebound in the future, staff advise that there is a need to more effectively manage impacts through the creation of STR registration requirements together with region-wide updates to all official planning documents. These new and updated regulations are intended to support the tourism industry and residents' participation in the sharing economy, while also reducing negative impacts on long-term housing supplies and residential neighbourhoods. In developing these regulations, coordination with provincial regulations and related municipal initiatives is important in establishing a clear and consistent approach. Care will also be needed to ensure that the timing and nature of engagements with tourism-related business and the implementation of new regulations is sensitive to COVID-19 impacts.

BACKGROUND

Short term rentals (STR) are temporary overnight accommodations rented out by property owners or tenants, typically for a few nights or weeks. Over the past few years, the prevalence of STRs have grown through the popularity of online platforms such as Airbnb, VBRO and HomeAway. The growth of STRs in HRM has generally proceeded unmanaged, which has raised concerns about impacts on residential neighbourhoods and long-term rentals. In this context, the Community Planning and Economic Development Standing Committee (CPED) requested a staff report that consider the creation of a by-law to regulate STRs. Key components of this request include:

- completing a jurisdictional scan;
- creating a resident survey; and
- consulting with the short-term rental industry and the Province of Nova Scotia

This report responds to CPED's request for information and advice on regulating STRs. The following background sections outline the STR industry and regulatory context in HRM.

Short-Term Rentals (STRs) in HRM

STRs are distinguished from traditional tourist accommodations, like hotels, inns, or bed and breakfasts, in that they are generally located within someone's home and do not have distinguishing features, such as signage that suggest it is used for tourist accommodation. STRs are part of the global rise of the sharing economy, which uses online platforms to connect people who have something to offer (a ride, storage space, a place to stay) with people who are looking for that same thing. Through platforms such as Airbnb, VRBO, and HomeAway, the STR industry has grown beyond hosts renting a portion of their personal home on a part-time basis and now also includes commercial operations where a single owner may rent multiple properties year-round with support from property management contractors.

The rapid growth of STRs in HRM reflect global trends. The following summarizes the characteristics and growth of STRs in HRM based on information obtained from AirDNA, a third-party service that collects information on STR activity from Airbnb and other web platforms.

- the number of STR listings in Halifax has increased from 959 listings in August 2016, to 2,581 in August 2019;
- the number of active listings varies seasonally, reflecting the connection between STRs and tourism;
- STRs in HRM are dominated by entire home listings, which accounted for 80% of all August 2019 listings;
- listings are concentrated in urban areas and coastlines, with Halifax Peninsula and Downtown Dartmouth holding the highest concentrations of STRs;
- suburban areas such as Bedford show some of the highest year-over-year STR growth rates;
- STR hosts in HRM collectively made \$30.9 million in revenue in 2019; and
- revenues are unequally distributed, with the top ten percent of hosts earning 55% of all revenue.

Please see Attachment A for a more detailed infographic showing the location and characteristics of STRs in HRM based on available AirDNA data.

Please note that the above information is based on August 2019 activity and does not reflect the impact of the COVID-19 pandemic. Information on STR listings continues to be collected and it is still too early to know if the impact will be short-lived or will fundamentally change STR trends in HRM and around the world.

Existing Policies and Regulations

Municipal regulations currently allow for several different types of accommodations related to the STR market, including hotels, motels, bed and breakfasts, and boarders and lodgers. While HRM's various land use by-laws do not speak specifically to STRs, they generally permit up to 3 boarders within a home. In

some plan areas, residents can rent an extra dwelling unit that the principal occupant does not need to live in as a tourist accommodation through special approval from Council. It is worth noting some plan areas also include permissive mixed-use zoning that allow for a variety of land uses, including hotels or motels. Such zoning would consider STRs as a permitted use.

Where STRs are located on properties in residential zones that do not permit tourist accommodations, for Land Use By-law (LUB) compliance purposes, STRs are considered a commercial use and, therefore, not permitted. In 2017 and 2018, HRM compliance officers opened approximately 375 compliances cases in response to complaints about STRs.

Under existing land use regulations, proving the presence of an illegal STR can be very difficult. Evidence of an online ad is not sufficient, and to proceed with enforcement, additional first hand evidence of the activity taking place at the property is required, such as witness statement from an individual that stayed at the property, witness statement from the neighbours, including noting renters coming and going, or an admission from the property owner that they are renting their dwelling as an STR.

Provincial Legislation

In March 2019, the Province of Nova Scotia approved the *Tourist Accommodations Registration Act* to modernize its legislation and support tourism growth across the province. The new legislation defines STRs and will require STR hosts, except those who rent in their primary residence, to register through an online system. At the same time, the province also approved amendments to the *Assessment Act* to ensure small-scale operators will pay a residential property tax rate, rather than a commercial rate. Over the summer and fall of 2019, the Province engaged municipalities and industry on the related regulations and conducted an online survey for STR hosts and general residents.

In February 2020, the province published the *Tourist Accommodations Registration Regulations*, that further clarifies which types of tourist accommodations will be required to register with the province and be subjected to associated fees, conditions and penalties. The *Tourist Accommodations Registration Act* and associated regulations came into force on April 1, 2020, with registration fees deferred until 2021.

COMMUNITY ENGAGEMENT

Resident Survey

As requested by CPED, staff created a resident survey to understand the impacts of STRs. From November 1st to November 30th, 2019, the public was encouraged to participate in an online questionnaire regarding STRs (paper copies of the questionnaire were also made available). The survey had a high response rate, indicating strong public interest in STRs. A total of 3,828 residents completed the questionnaire. Attachment B provides a detailed summary of the survey results and the following paragraphs highlight key themes.

Who Responded to the STR Survey?

- 74% indicated that they have stayed in an STR before, most often while travelling as tourists;
- 57% report they are aware of STRs in their neighbourhood;
- 88% of respondents are not STR hosts;
- North End Halifax, and Downtown/South End Halifax saw the highest number of responses; and
- while a wide range of ages responded, the largest group (37%) were 18-34 year-olds.

Common Themes

The majority of respondents support STR units where the host lives in the unit, or on the property, but do not support STR units where the host does not live on the property. A reoccurring theme was concerns about the negative impact STRs have on the availability of traditional rental properties, opportunities to buy a home, neighbourhood compatibility and safety in the community. Positive themes include perceived benefits for the tourism industry and local shops and restaurants. Many respondents have used STRs themselves and found them to be more affordable and convenient than traditional accommodations.

When asked what considerations are most important for the Municipality to explore, should it decide to regulate STRs, respondents ranked the following five items as most important:

1. protecting the supply of traditional rentals;
2. protecting the integrity of residential neighbourhoods;
3. collecting appropriate taxes;
4. requiring minimum standards; and
5. collecting STR host information (how many units rented, location etc.)

What Did STR Hosts Say?

A series of questions were asked specifically to those who indicated they were STR hosts. Responses showed that:

- most operate a STR because it is a source of income, and because it offers more flexibility than renting to long-term tenants;
- most operate only 1 STR unit, with the highest reported number being 60 STR units; and
- about half operate an STR outside their primary residence or property.

If hosts did not rent their unit as an STR, most hosts indicated that they would:

- rent it out long term (29%);
- do nothing with the space (25%); or
- sell the unit (16%).

When asked about various types of regulation, hosts generally responded that these would have a negative impact on the industry. One exception was “requiring units to meet similar standards as traditional tourist accommodations”; a small majority indicated safety and accessibility standards would be positive for the industry. Interestingly, feedback was split on whether “no regulation” would be positive or negative for the industry, with a small majority indicating it would have a negative impact.

The following themes emerged from the written comments provided by STR hosts:

- Many hosts indicated that they need the money generated by the STR unit and are concerned regulations would have a negative impact on their income earning ability.
- Many comments acknowledged that STRs may be negatively impacting housing availability and recognized the need for some regulation. These comments often suggested regulating commercial operations where hosts do not live on the property or operate multiple units.
- Respondents also expressed concern that rural areas would be unfairly regulated in the same way as urban areas.

Neighbourhood Impacts

A series of questions were asked specifically to those who indicated they were aware of STRs in their neighbourhood.

- 44% of respondents who were aware of a STR in their neighbourhood expressed dissatisfaction with their experience;
- 26% were neither satisfied or dissatisfied; and
- 28% expressed satisfaction.

When asked to rate their own experience of living near STRs based on specific factors, respondents indicated that STRs had mainly negative impacts on factors such as rent prices, sense of community and availability of traditional rentals. Respondents further indicated STRs had no impact on neighbourhood commercial uses and sense of safety. The percentage of negative impacts increased when host's responses were removed.

More than 1,500 respondents offered general written comments. From this feedback, five key themes emerged as follows in order of frequency.

- Regulations are Needed: The greatest share of comments called for some type of regulation.
- Negative Impacts to Long Term Rental Availability and Affordability: many comments expressed concern of the loss of long-term rental housing to STRs and associated the lack of affordable housing with the increase in STRs.
- Neighbourhood Incompatibility: a large group of comments expressed concerns about noise from parties, increased nuisance or illegal activities, increased traffic, garbage, personal safety, and loss of community due to transient guests replacing long term residents.
- Limit Commercial Operators: comments expressed concern over hosts who do not live on the property, or have multiple entire home properties, or clusters of private rooms functioning as STRs.
- Fair Taxation: Comments under this theme express concern that some STR operators do not pay appropriate taxes. Many indicated that STRs should be taxed “on a level playing field” with hotels and bed and breakfast operations.

It is worth noting there were also smaller sub-groups who advocated for no regulation, while there were others who would like to see a complete ban.

Stakeholder Engagement

Through the past several months, staff consulted with a range of stakeholders including Airbnb and Expedia/VRBO, STR and the sharing economy experts, the NS Hotel Association, Discover Halifax, Tourism Nova Scotia, neighbourhood groups, property management companies and STR hosts. Consultation was conducted through one-on-one meetings and attending community events. The following summarizes the feedback received.

- The STR platforms stressed how the nature of their business model helps small scale property owners gain additional income while providing tourists a different experience compared to a traditional hotel. They noted any municipal regulations should be straight forward and not overly burdensome. While Airbnb did not advocate for any particular approach, Expedia/VRBO encouraged HRM to consider examples from US cities that allow people to use one investment property/unit as an STR. Airbnb noted they have been taking strides to ensure responsible usership and to avoid the use of STRs for party houses. It is also worth noting that both Airbnb and Expedia/VRBO raised concerns with the accuracy of AirDNA data on STR listings, as well as the UPGO study on housing impacts, outlined in the Discussion section of this Report, which relies on much of the same data. However, both platforms indicated that they were not able share any alternative data with the Municipality for comparison.
- Sharing economy and STR experts also stressed the importance of ensuring regulations were simple to understand and not overly burdensome to avoid non-compliance. Requiring all STRs to enter into a registration system was noted as an important foundation for any type of regulation. Where housing availability is a concern, limiting STRs to primary residents was further noted as a simple form of regulation.
- Discover Halifax and Tourism NS discussed the need for STRs to fill accommodation gaps that hotels are sometimes unable to meet during peak seasons or in more rural locations and highlighted how STRs can provide a different type of tourist experience. Both agencies did appreciate that municipalities do need to be aware of the potential impact that STRs may have on long-term rentals and the general well being of their residents.
- The hotel industry noted the different roles that hotels and STRs play in the tourism sector, with hotels continuing to be important in attracting large conferences and events to the region. Feedback generally emphasized the importance of a level playing field from a taxation and regulation perspective.

- Property management companies noted the need for some form of regulation especially in regards to health and safety standards.
- Host and resident groups generally mirrored the feedback captured in the public survey. The majority of hosts expressed their desire to follow municipal and provincial rules regarding STRs. Some hosts did express frustration with STRs being held accountable for the lack of affordable housing. While residents appreciated the appeal of STRs from a tourism perspective, they expressed concerns regarding the impact commercial STRs can have on a residential neighbourhood.
- The Housing and Homelessness Partnership had several discussions regarding the impact of STRs on low vacancy rates and how this impacts the availability of affordable housing.

Staff also participated in several meetings with provincial staff to better understand the *Tourist Accommodation Registration Act*, related amendments to the *Assessment Act* and research that the province will be undertaking regarding the impact of STRs on housing throughout Nova Scotia.

Public Participation Program

Should Regional Council choose to initiate the RMPS, SMPS, and LUB amendment process, the *HRM Charter* requires that Regional Council approve a public participation program. In February of 1997, Regional Council approved a public participation resolution, which provides broad discretion on the consultation process required for MPS amendments that are regional in nature. Staff advise that considering amendments to update land use controls regarding short-term rentals in applicable planning documents is regional in nature since the project may impact all areas in the Municipality. Accordingly, should Council initiate the MPS amendment process, staff recommend that Regional Council obtain stakeholder and public feedback through:

- a municipal webpage and on-line questionnaire;
- targeting consultations with rural communities through one or more community based events, such as participating in residents association meetings, pop up displays at community hubs or collaborating with other HRM open houses or events, provided the risks related to COVID-19 have passed and it is safe to hold in-person meetings; and
- targeted consultations with industry, community and government stakeholders including, but not limited to, the Nova Scotia Department of Business, Discover Halifax, the Nova Scotia Hotel Association, resident associations, STR platforms and STR hosts.

In addition to this public participation, the *HRM Charter* requires a public hearing to be held before Regional Council can consider approval of any amendments. Regional wide amendments to Regional Plan and all applicable SMPSs and LUBs will potentially impact the following stakeholders: residents, STR platforms, STR hosts and tourism related business.

DISCUSSION

Like regions throughout North America, HRM is experiencing rapid growth of STRs and both the positive and challenging impacts associated with the growing role of the sharing economy. To manage impacts, staff advise that there is a need to establish STR registration requirements together with region wide updates to official planning documents to more effectively support the tourism industry while also reducing negative impacts on long-term housing supplies and residential neighbourhoods. While the unprecedented impact of COVID-19 on tourism is expected to significantly reduce the number of STR stays and listings in the short-term, staff advise the development of regulations should still be advanced to enable new controls to be in place on in the assumption that tourism activity will rebound in the months and years ahead. The following sections discuss the regulatory approaches found in other jurisdictions, the impact of STRs on tourism, housing and neighbourhoods, health and safety, related initiatives and the recommended policy and regulatory direction for more effectively managing STRs in HRM.

Jurisdictional Scan

A jurisdictional review of 22 North American cities shows that a variety of regulations are used to manage impacts of STRs. Attachment C provides a detailed summary of the jurisdictional scan and the following highlights several common approaches adopted by various cities.

Principal Resident Requirements

Many cities only allow principal residents of dwelling units to rent rooms (i.e., spare bedroom), or rent out their entire home while out of town as an STR. These primary resident restrictions are intended to maintain long-term housing supplies and reduce impacts on residential neighbourhoods. STRs that are not occupied by the principal resident are either not permitted or are subject to further regulation.

Licensing

All jurisdictions require all STRs to register or obtain a business licence to help keep track of who is hosting STRs and where they are located. Licensing is also important to support compliance with other related regulations. Most jurisdictions require the licence or registration number to be posted in any advertised listing. Yearly license fees for operators vary from \$25 in Denver to \$625 in Nelson BC. The City of Toronto requires STR platforms to pay a one-time licensing fee of \$5,000, plus \$1 for each night booked through the company.

Zoning:

Most cities limit where STRs are located and how they are permitted based on the type of neighbourhood (residential, mixed-use and commercial etc.). The use of zoning is intended to prevent incompatibility between uses and makes it clear where STRs are permitted and where they are not.

Tax or Marketing Levy:

Most cities require hosts (or guests) to pay a fee collected by the municipality to help level the playing field with hotels or other larger scale tourist accommodations that currently pay a marketing or tourism levy. These fees are often collected to support cultural programs, tourism development or affordable housing initiatives. Fees are generally between 3-6%, but some cities have set rates as high as 14% or as low as 1.8%.

Maximum Amount of Properties:

Some cities limit the number of properties one person can use for STRs, which is usually set at one or two properties. This provides the opportunity for people to use an income property as a STR, while limiting the opportunity of individuals or businesses from using several properties as STRs. This type of regulation can be useful for areas where cottages or seasonal residents are prevalent.

Maximum Amount of Rooms/Guests:

Some cities limit the amount of rooms/guests that can be rented out at a single time to help prevent entire houses/apartments from being rented as STRs by the room. Limits range from between two to five rooms and up to ten guests.

Maximum Amount of Nights:

Some cities limit the number of nights one can rent out rooms or entire homes as STRs. Limits on the number of nights range from 90 to 120 days per year. These limits are intended to reduce impacts of STRs on residential neighbourhoods. This approach also allows for units to be rented out monthly for a portion of the year and used as a STR when the tourism demand is higher.

None of the 22 cities approached regulation through only one tool. All cities reviewed required some form of registration or licensing and imposed a tax or levy. Most (17) also managed STRs through zoning and required the principal occupant to live in the unit or on the property. Less frequently used tools included limits on the amount of days or rooms that can be used for STRs, likely given the difficulty with enforcement.

Few jurisdictions speak to STRs in secondary and backyard suites specifically. However, where STRs are limited to principle residents of dwelling units, the requirement usually also applies to secondary and

backyard suites. This means that only the tenant of a secondary or backyard suite may use the unit as an STR. Those jurisdictions that do permit STRs in secondary and backyard suites, absent a principal resident, generally require the property owner to live in the main dwelling. Further, most jurisdictions limit one STR per lot meaning that either the main dwelling or secondary/backyard suite can be used as an STR, but not both.

Through research on STRs and conversation with experts, the approach adopted by the City of Vancouver was often identified as a successful model to consider. Vancouver only permits STRs within one's primary residence and requires all STRs to obtain a business license. STRs are permitted in multiple unit dwellings, provided the STR is allowed by the landlord or condo board. Any STRs that are not within a primary residence are considered a hotel and, as such, must obtain a hotel licence and meet commercial zoning requirements. All STRs must include the licence number in advertisements. The Vancouver model success can be attributed to straight forward rules, a simple and low-cost registration process, clear guiding principles, and a team dedicated to monitoring and enforcement.

Tourism

Tourism is an important and growing part of both the Nova Scotia and Halifax economies. Building on the goals contained in the 2014 [Now or Never Report](#), the Province set a goal to grow annual tourism revenues from \$2 billion in 2010 to \$4 billion by 2024. To support this goal, the Province through Tourism Nova Scotia and other departments/agencies is promoting tourism growth through a variety of initiatives, including targeting key markets and investing in key tourism sites.

In HRM, Discover Halifax estimates that tourism contributes to supporting 4,000 businesses employing 34,000 people. This includes 5.3 million overnight stays and approximately \$1.3 billion in spending by visitors. On average, 1 out of every 27 people in Halifax are an overnight visitor, supporting not only tourism related business, but also a wide variety of local shops and services. While most overnight visitors continue to stay in traditional hotels, both cruise ships and the STRs are playing an increasing role (Table 1).

Table 2: room nights sold in HRM by type of accommodation

Type of Accommodation	Room nights sold (2018)	% change from prior year	% change from 2013
Traditional Hotel	1,409,484	2%	12%
STRs	359,040	67%	553%
Cruise Ships	316,859	8%	26%

As shown above, STRs as a share of total room nights sold has been increasing and this trend is expected to continue as the tourism sector grows and visitors seek affordable and unique experiences. However, it is important to highlight that the growth of STRs in HRM has not been at the expense of traditional hotels, which has increased the total supply of rooms from 5,030 rooms in 2013, to 5,545 rooms in 2018. In addition, several hotel developments are currently proposed or under construction, which will further add to the supply of traditional hotel rooms in the coming years. Please note that the above information does not consider the significant impacts that COVID-19 may have on short and longer-term tourism trends, which may quickly rebound, or experience on-going challenges.

Housing

As highlighted through the resident survey, STRs are often associated with concerns about the loss of long-term rental housing and increasing rents. Academic studies from the US and Canada confirm these negative effects of STRs on housing supplies and affordability. However, it is important to note that while STRs are shown to aggravate these housing issues, they are not the fundamental cause of them.

A number of studies show that neighbourhoods with high levels of STRs see their long-term rental housing supply constrained. STRs can deliver higher revenue than traditional long-term rentals, creating a financial incentive for landlords to switch from long-term rentals to STRs, particularly in high demand tourist markets and seasons. Housing loss due to STR conversion can occur directly, where tenants are evicted or not

replaced at the end of a lease, or indirectly by absorbing new construction which otherwise would have gone into the long-term market. This potential is especially concerning in markets such as HRM that have very low vacancy rates. The rental vacancy rate in HRM has been decreasing for the past several years and in January 2020, CMHC released the latest rental market report indicating that the overall vacancy rate in Halifax is only 1%. In the South End of the Peninsula, the vacancy rate is 0.4%, and in the Hammonds Plains area, just 0.2%. These low vacancy rates are primarily caused by strong population growth, and a slower rate of housing developments that have not kept pace with demand. In tight housing markets such as HRM, slight changes to the number of available rental units have a significant impact on the availability and affordability of rental housing.¹

UPGO Short-Term Rentals in Halifax Study

In November 2019, UPGo, the Urban Politics and Governance research group at McGill University led by David Wachsmuth, published a [study](#) about the impact of STRs on rental housing in HRM. Professor Wachsmuth is a leading expert on short-term rentals and their impacts on housing across Canada and the US. Dr. Wachsmuth publicly presented the study results on November 14, 2019, at the Central Halifax Library.

The UPGo study measured housing loss due to STRs by using available data to estimate the number of STRs that are not also used as a person's primary residence. This included entire home listings which were available for rent at least half the year (183 nights) and rented at least 90 nights, as well as properties with multiple private room listings. The study assumed that these listings are not from hosts offering their primary residence, as under this level of use, it would be very difficult for the operator to live on the property. By using this approach, the UPGo study estimated that 740 housing units were lost to STR operations, which represents approximately 1% of HRM's total rental housing supply. While this may not seem significant, it means that the vacancy rate could be nearly doubled by removing non-primary resident STRs from the market. The impact could be even greater in Downtown Halifax where there are twice as many STRs as vacant apartments.

The UPGo study acknowledges that these newly available units would be absorbed relatively quickly and that the vacancy rate would decline again, but likely at a higher rate than before. The study suggests that regulating commercial (non-primary resident) STRs could return hundreds of units back to the rental market and contribute to increasing rental housing availability much quicker than other types of housing initiatives.

Affordability

The impact of STRs on housing costs is not as clear as the impacts of STRs on supply, however, several studies from the US suggest that home sharing leads to an increase in rents by restricting rental housing supply. Tourists are willing to spend much more per night on accommodations than residents, which inflates the value of accommodation rates across the board. Economist William Watson notes that whether rental prices rise, ultimately depends on how much more rental housing is constructed in response to rising rents.² Overall, there is evidence that a greater density of STR listings in a neighbourhood contributes to an increase in both rents and house prices. The degree to which housing prices rise depends on how the supply of housing responds to demand. Again, in areas where there is a low vacancy rate and where the market is in favour of the seller, there is evidence to suggest that STRs contribute to increases in housing prices.

¹ Prism Economics and Analysis. (2019). *Rental Accommodations Literature Review and Inter-jurisdictional Environmental Scan - City of Ottawa*.

² Watson, W. August 17, 2017. Proposal to regulate Airbnb would be like supply management for lodging. *Financial Post*. Available from <https://business.financialpost.com/opinion/william-watson-proposal-to-regulate-airbnb-would-be-like-supply-management-for-lodging>

Neighbourhood Impacts

Managing impacts of businesses on residential neighbourhoods is an integral component of land use planning and a common concern raised by residents about STRs in the survey. Like many cities, HRM's existing land use planning documents consider traditional overnight accommodations, such as hotels and motels, as a commercial use that are permitted in a wide variety of commercial and mixed-used zones. Smaller operations, such as traditional bed and breakfasts, are sometimes permitted in residential areas. However, to manage land use conflicts, such business are limited in scale and often require the owner/operators to live on site.

The main reason for treating various forms of overnight accommodation differently than residential uses are the type of activities associated with long-term vs short-term stays. While buildings containing residential uses and overnight accommodations can and often do look similar, people's activities are often quite different. For example, the coming and goings in residential neighbourhoods often follow typical work week schedules, with any parties generally limited to weekends, and only a few times a year. In contrast, people on vacation often follow very different lifestyle patterns and are more likely to take part in louder activities compared to their lifestyles when at home and working. In addition, people on vacation, even when very conscientious, don't have the time to get to know and adjust to any neighbourhood sensitivities, or learn neighbourhood schedules, such as garbage pick up days.

The Municipality's existing policies and regulations for home-based business provides insights for balancing business and residential interests in residential neighbourhoods. Similar to overnight accommodations, existing planning documents direct standalone offices, day cares and other similar business uses to commercial or mixed-use areas. However, under home-based business provisions, such businesses are generally permitted in residential areas, provided that the business is limited in scale and the operator lives on-site. These home-based business controls provide opportunities for people to work from home, while ensuring that the scale of the business is compatible with the residential character of the neighbourhood and that the business operator, who is also a resident, maintains traditional neighbourhood responsibilities and connections with neighbours.

Marketing Levy and Assessment Act

The marketing levy is a fee intended to help fund tourist initiatives in HRM. By-law H-400, which is enabled under the *Halifax Regional Municipality Marketing Levy Act Marketing Levy Act*, requires hotels and other types of tourist accommodations that are registered under the *Tourist Accommodation Registration Act* and have twenty or more rooms to charge a 2% marketing levy of the price for accommodation. Funds collected through the marketing levy are directed to Discover Halifax (60%) and the HRM general reserve (40%). Smaller tourist accommodations, such as inns or bed & breakfasts with less than 20 rooms, are not subject to a marketing levy due to their smaller size and traditional difficulty in advertising. However, through the increased use of online platforms, advertising tourist accommodations is becoming less difficult. In addition, a commercial STR host may offer 20 or more rooms through several properties, but if they are not all located on a single property, they would not be subject to the marketing levy. Applying a marketing levy to operations consisting of less than 20 rooms would help ensure a level playing field between traditional hotels and dispersed STR operations but would require an amendment to the *Halifax Regional Municipality Marketing Levy Act Marketing Levy Act*.

The *Assessment Act* currently applies a commercial tax rate to tourist accommodations that offer 4 or more rooms. Since the majority of STRs are not tracked, the majority would not be subject to a commercial tax rate regardless of the number of rooms offered for short-term accommodation. While the province is considering amendments to the *Assessment Act*, it is understood these amendments are intended to ensure that those who offer tourist accommodations within their primary residence would not be subject to a commercial tax rate. Additional regulations would be needed to ensure that investment STRs are taxed commercially, regardless of the number of rooms offered or properties owned by a single person or business.

Health and Safety

Health and safety was noted as an important consideration in the resident survey and through consultation with property management groups, STR hosts and platforms. While the primary health and safety concerns for STRs are meeting minimum building code and fire safety regulations, there are also concerns regarding the consistency of providing evacuation plans, emergency contact information to guests and ensuring cleanliness.

Safety risks are greater in buildings where no operator lives on site. Ghost hotels describe a situation where rooms or units are let out on an individual basis but there is no host on site. This is concerning from a health and safety standard as guests may not know which rooms are occupied in case of an emergency.

The jurisdictional scan found that health and safety requirements for STRs are typically limited to building code and fire regulations. Many jurisdictions require a statutory declaration that the STR unit meets a prescribed fire safety checklist to qualify for a license. This is the case in Vancouver, Toronto, and Kelowna. Calgary requires a fire inspection to be carried out when 5 or more units are offered for rent. In addition, STR platforms indicate that they have to implement checks on health and safety standards, including reporting from guests and targeted safety audits.

Related Initiatives

The following summarizes HRM's existing initiatives related to STRs.

Rental Registry

On April 30, 2019 Regional Council directed staff to prepare amendments to By-law M-200, Respecting Standards for Residential Occupancies, that include provisions for mandatory registration of residential rental accommodations. The registration requirements are intended to apply to all residential rental units, to facilitate a more strategic inspection process, improve community integration, and help ensure rentals meet minimum safety and liveability standards.

Joint Project for Regulatory Modernization

As part of the Joint Project for Regulatory Modernization, the province and HRM are working together with the business sector to reduce red tape and develop more effective regulation. This collaboration is working to reduce the regulatory burden caused by rules, requirements and processes that are unnecessarily complex, outdated, or redundant. These barriers are costly for business and government and can impede economic growth and innovation. HRM adopted a *Charter of Governing Principles for Regulation Administrative Order* in February 2018 to help modernize regulation and incorporate Regulatory Impact Assessment (RIA) and regulatory reform best practice into decision-making. One of HRM's concerns when considering new regulation is the potential to impose unnecessary costs or impacts on business. The regulation of STRs is a multi-jurisdictional policy issue that will require municipal-provincial collaboration to avoid risks of adding more regulatory burden to business and government. The potential burden of red-tape that could be created by two separate registries has been raised by business and by HRM as a concern. There are on-going discussions between HRM and the Province about coordinating registries or at least using the same online platform to collect and share data. This may allow STR operators to register through one portal.

Plan and By-law Simplification

HRM's inconsistent and outdated land use plans are in the process of being reviewed, consolidated and simplified through the Plan and By-law Simplification initiative. This work is underway through the Centre Plan project and will address inconsistent suburban and rural plans in the coming years. Since STRs impact all parts of the Municipality, any updates to planning documents to regulate STRs should be closely coordinated with the Plan and By-law Simplification program to ensure that any new regulations support the initiative's goals.

Proposed Policy and Regulatory Approach

Staff advise that there is a need to update HRM's policy and regulatory approach to STRs throughout the Municipality to more effectively:

- support tourism and resident's participation in the sharing economy;
- reduce impacts on long-term rental housing supplies and affordability; and
- reduce potential land use conflicts in residential areas.

Guided by the above objectives, staff recommend Council initiate a project to update all applicable land use planning documents and establish STR registration requirements consistent with the following policy direction.

1. Require all STRs to register with the Municipality: As shown by the experience of other jurisdictions, a registration or licencing system for all STRs is essential to establishing effective STR regulations. This will require coordination with the Province, which is in the process of establishing a registration system limited to non-owner occupied STRs, and the municipal initiative to establish registration requirements for all types of rental properties. Where possible, registration requirements should be clear and straightforward for the end user, coordinated with STR on-line platforms, and avoid the need for businesses to register through multiple systems.
2. Continue to allow hotels and other forms of commercial overnight accommodations in commercial and mixed-use zones: HRM's existing planning documents currently allow hotels, motels and other types of commercial overnight accommodations in a wide variety of commercial and mixed-use zones. As needed, definitions may need to be updated to clarify that commercial STRs are considered hotels, and subject to the same regulatory requirements to ensure that there are no financial incentives to convert residential units to commercial STRs. This may require additional discussions with the province to ensure that commercial STRs are assessed and taxed as commercial uses and subject to the HRM marketing levy.
3. Within residential zones, only permit STRs in primary residences: Limiting STRs in residential zones to primary residences will help reduce impacts on long-term rental housing and mitigate land use conflict concerns. The primary residence requirement is consistent with existing home-based business policies and will also limit the number of nights properties can be used as STRs, given that people need to live on site for a least half the year. This requirement will require amendments to all applicable land use planning documents, as well as appropriate checks through the proposed STR registry. To reduce impacts on housing supplies, the use of secondary or backyard suites for STRs should only be permitted for the primary residents of the secondary or backyard suites. For any STRs within multi-unit residential buildings, the approval of landlords or condo boards should be required.
4. Within selected rural areas, consider allowing STRs of cottages and investment properties: Providing greater flexibility in rural areas may be important to supporting rural based tourism, given that there are fewer traditional hotels, and many seasonal cottages that would not meet the primary residence requirement. In addition, land use conflicts may be less of a concern given the dispersed nature of development. However, rental opportunities are also often limited in rural areas and controls on STRs may still be needed to maintain the limited supply of rental options. Further research and consultation with residents and stakeholders will be needed to develop a specific regulatory approach for rural areas of HRM.

The proposed project will focus on establishing clear and consistent land use planning and business registration requirements for all areas of HRM. Amendments to the Regional Plan may also be needed to provide region wide objectives and policy guidance. This project work would:

- review and amend all applicable SMPSs and LUBs;
- be closely coordinated with the Plan and By-law Simplification, Centre Plan Package B, rental registration project work; and
- involve stakeholder and public consultations including discussions with appropriate Provincial Departments, as outlined in the community engagement section of this report; and
- carefully time and design engagements with tourism related business and the future implementation of new regulations to ensure the approach is sensitive to COVID-19 impacts.

Conclusion

While the impact of COVID-19 on HRM's tourism industry is expected to significantly reduce the number of STR stays and listings in the short-term, it is not yet clear how long impacts will last. STRs can quickly be re-listed and there is an expectation that tourism activity will rebound in the future. Further, in response to COVID-19, some STRs have been marketed as quarantine sites for emergency workers or those visiting from outside the "Atlantic Bubble". As regulations surrounding COVID-19 are further lifted, there is also a need to consider the public safety implications of opening one's home to the travelling public.

As such, staff advise that there is a need to more effectively manage impacts through the creation of STR registration requirements together with region wide updates to all official planning documents. These new and updated regulations are intended to more effectively support the tourism industry and resident's participation in the sharing economy, while also reducing negative impacts on long-term housing supplies and residential neighbourhoods. In developing these regulations, coordination with the provincial regulations and related Municipal initiatives is important to establishing a clear and consistent approach. Care will also be needed to ensure that the timing and nature of engagements with tourism related business and future implementation of new regulations is sensitive to COVID-19 impacts.

FINANCIAL IMPLICATIONS

The HRM costs associated with amending planning documents and drafting a STR registration/licencing by-laws can be carried out under the approved operating budget with existing resources. However, additional costs may be associated with developing the technical component of a STR registration system, depending on the ability to coordinate technical work with the Municipal rental registration initiative and the province's partial STR registration platform.

Upon establishing new STR regulations, there may be a need for additional staff to monitor and enforce these regulations. Recouping program costs will be a consideration when establishing any new fees associated with short-term rentals revenues. Details of both are unknown at this point, however, the financial implications associated with proposed regulations will be discussed in a future report.

RISK CONSIDERATION

There are no significant risks associated with the recommendations contained within this report. The development of new by-laws and MPS amendments are at the discretion of Regional Council and are not subject to appeal to the N.S. Utility and Review Board. Information concerning risks and other implications of adopting new STR regulatory requirements will be discussed in a subsequent staff report.

ENVIRONMENTAL IMPLICATIONS

No environmental implications are identified.

ALTERNATIVES

Regional Council may choose to:

1. Defer the consideration of new STR policies and regulations until the longer-term impacts of the COVID-19 pandemic on tourism and STRs are more fully understood.
2. Initiate amendments to the Regional Plan and all applicable planning documents together with the development of STR registration/licencing requirements that would differ from the policy direction

outlined in the Discussion section of this report. If this alternative is selected, specific direction would be needed and a supplementary report from staff may be required.

3. Initiate amendments to the Regional Plan and all applicable planning documents regarding STRs, without also establishing STR registration/licensing requirements. This alternative is not recommended as the experiences from other jurisdictions show that STR registration requirements are essential to effective monitoring and enforcement of related land use controls.
4. Decline to initiate amendments to the Regional Plan and all applicable planning documents together with the development of STR registration/licencing requirements. A decision of Council not to initiate a process to consider MPS amendments is not appealable to the NS Utility and Review Board as per Section 262 of the *HRM Charter*.

ATTACHMENTS

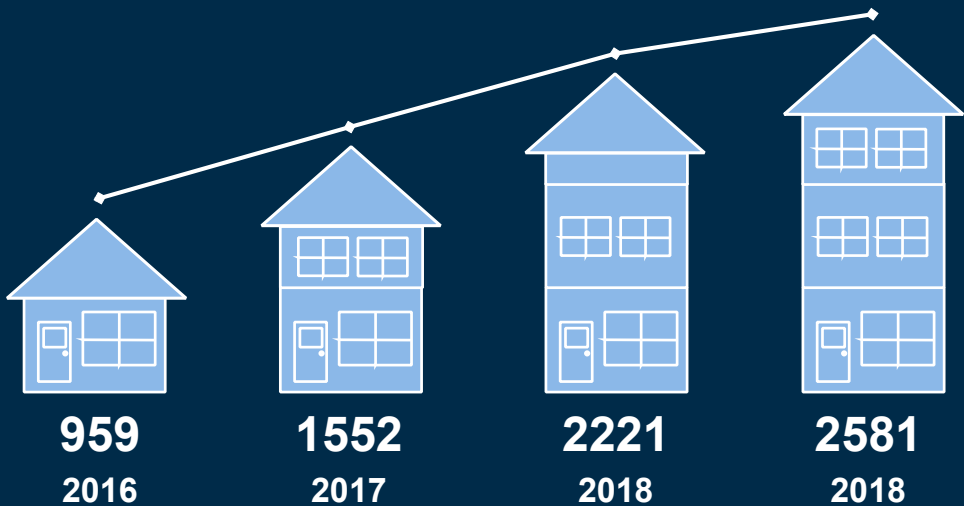
Attachment A: STR Infographic
Attachment B: Detailed STR Survey Results
Attachment C: Jurisdictional Scan Summary

A copy of this report can be obtained online at halifax.ca or by contacting the Office of the Municipal Clerk at 902.490.4210.

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Halifax Short Term Rentals (STR)

STR in Halifax increased from 959 in August 2016 to 2,581 in August 2019.



Hosts made \$30.9 million in revenue in 2019, with the top 10% earning 55% of all revenue. Each dot on the map shows 1 STR.

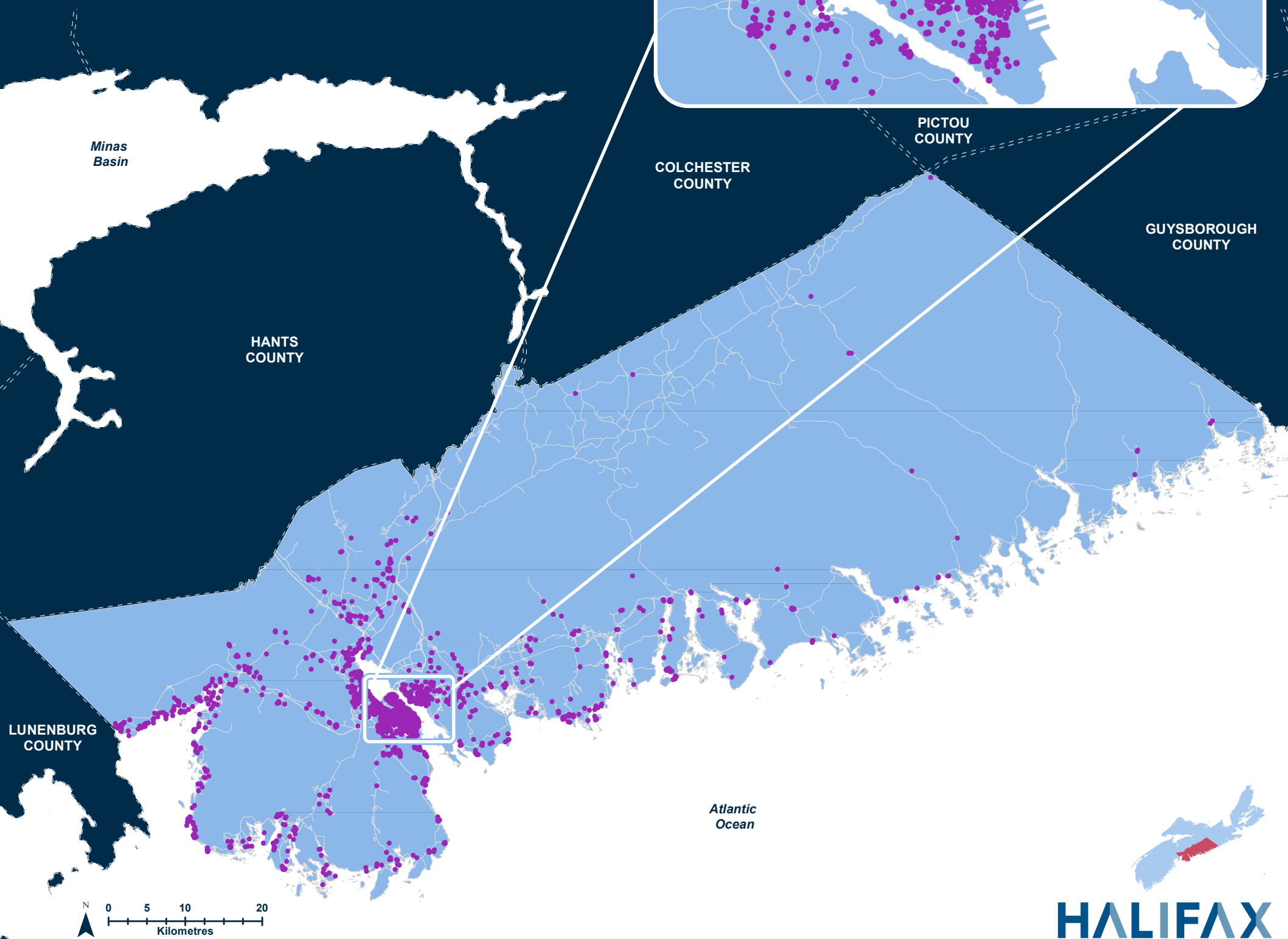
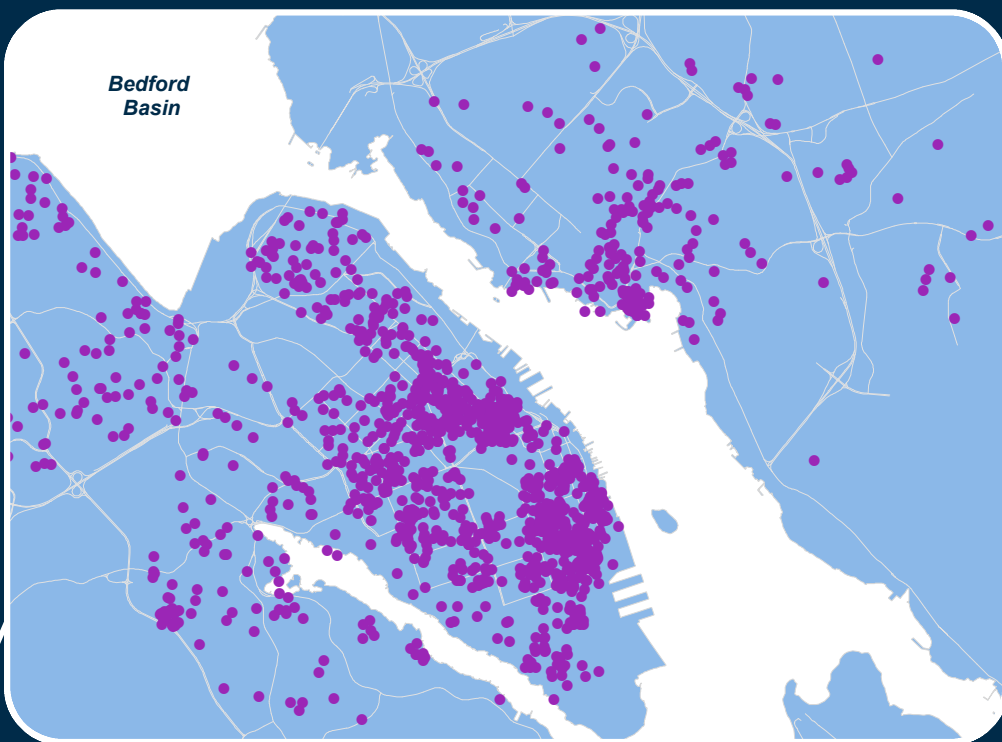
August 2019 Entire Dwelling STR Listing by Type

House, Bungalow, Semi, or townhouse	944
Guest suite	146
Apartment, Condo, Loft	772
Cottage, Cabin, Tiny Home	144
Traditional Tourist Accommodation (Hotel, B&B)	59
Other – RV, Camper, Boat, Houseboat	7

The Halifax STR market is dominated by entire dwelling unit listings, which accounted for 80% of all August 2019 listings.

Notes Regarding This Document:

Data for this report was retrieved from the AirDNA monthly market report for August 2019.



Attachment B: Detailed STR Survey Results

From November 1st to November 30th 2019 the public was encouraged to participate in an online survey regarding short term rentals (STR). The survey was hosted on the HRM Shape Your City website and was advertised through social media such as Twitter and Facebook and direct invitations to housing groups and resident associations. Paper copies of the survey were made available at 14 Halifax Public Library locations. During the 30 days the survey was live, a total of 3,828 residents completed the online questionnaire and 5,097 people visited the webpage. Five residents completed a paper questionnaire.

The survey comprised of 23 questions under 4 categories.

- 1) Tell Us What You Think About Short-Term Rentals
- 2) How do you use Short-Term Rentals?
- 3) How Have You Been Impacted by Short-Term Rentals?
- 4) Tell Us a Bit About Yourself

Certain questions were asked only of STR hosts, and others only of neighbors of STR units. The following outlines the survey questions and summarizes of the responses.

Tell Us What You Think About Short-Term Rentals

Question 1: *Based on your knowledge and experiences, please state whether you feel short-term rentals have a positive or negative effect on the following:*

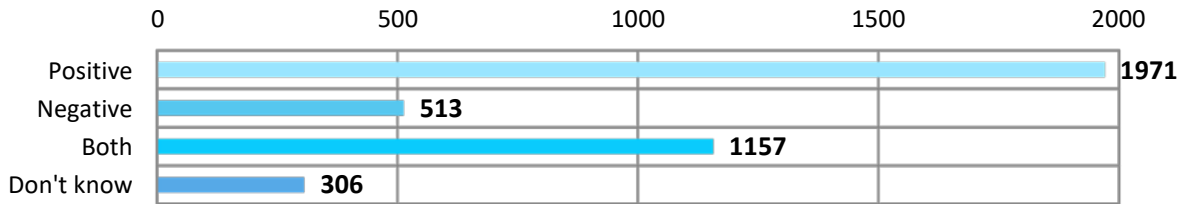
Written comments associated with this question reaffirmed the perceived negative impact that STRs have on the on traditional rentals in terms of availability and increases in rent. Several responses noted they were aware of long-term rental units being converted to STRs. Many responses also reaffirmed the perceived negative impact on the sense of community especially in cases where there is excess noise and property damage.

While the majority of comments focused on negative impacts, there were also several comments that supported positive impacts to tourism and also noted that STRs can bring more diversity to a neighbourhood and in some cases can improve property upkeep.

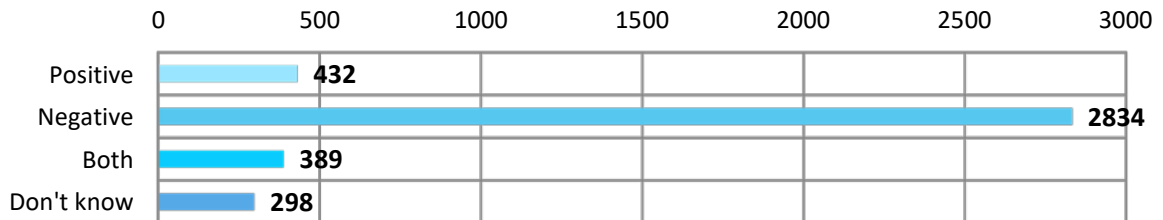
Several comments noted the need for regulation, such as taxation or requiring the host to live on the property and the need for a level playing field with traditional tourist accommodations. Several comments also noted the need for an affordable housing plan.

Some comments noted that there was a need for a neither category, especially in regard to the local economy and tourism.

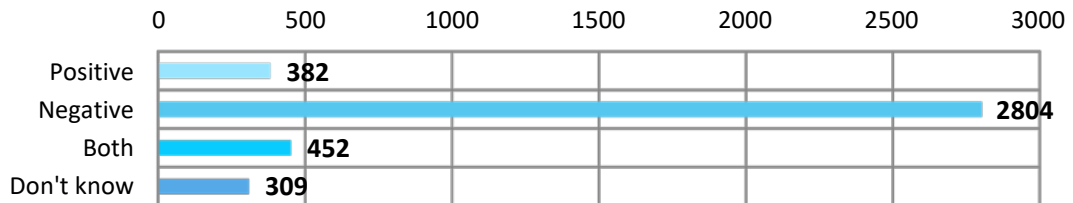
The local economy (brings more people to neighbourhood shops or restaurants)



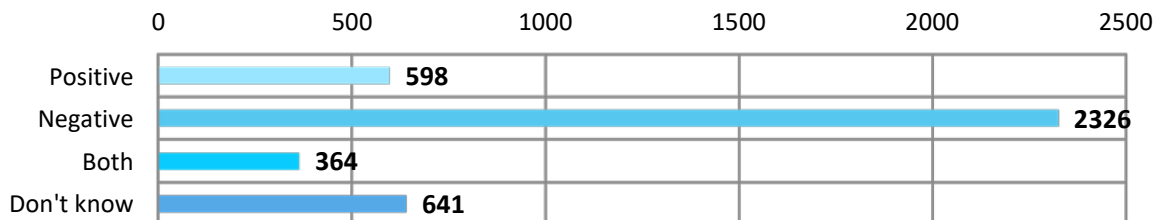
Availability of traditional rental properties



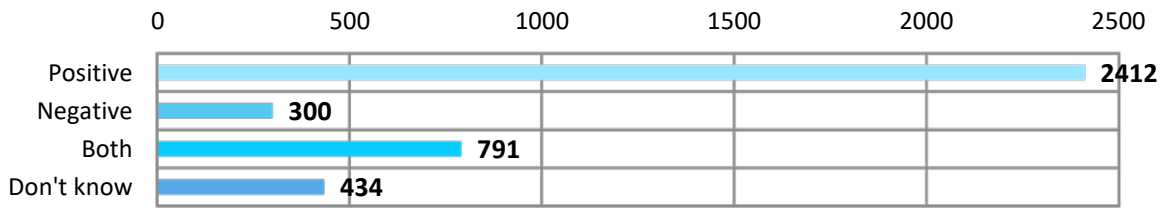
Sense of Community



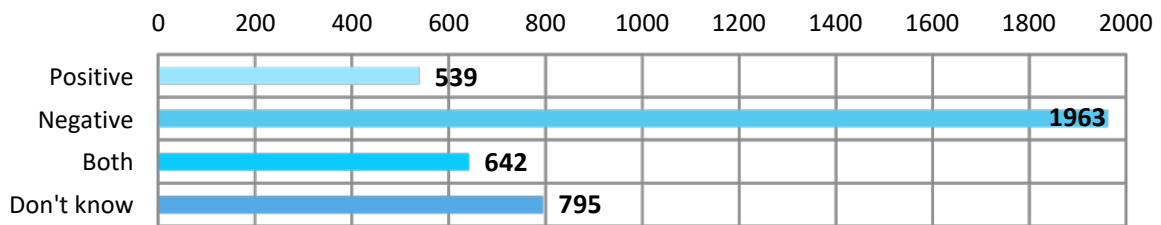
Buying a home



Tourism (bring more visitors to the region)

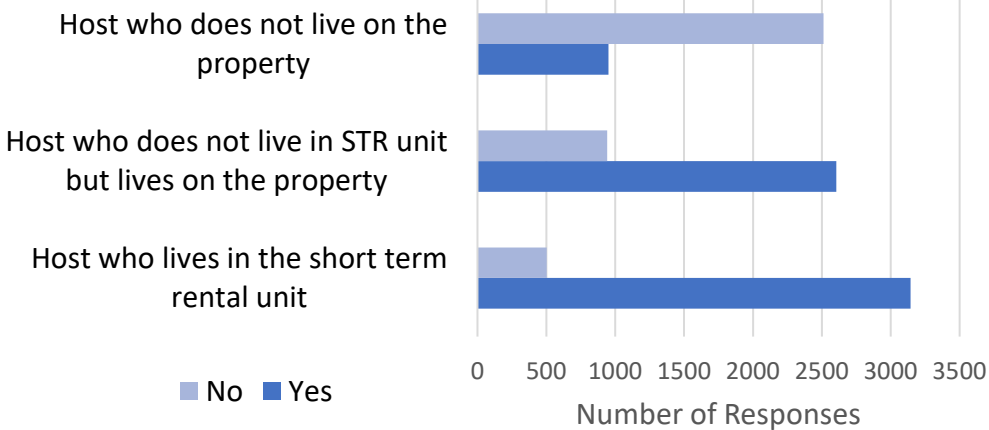


Safety in your neighbourhood, building or home



Question 2. Who should be allowed to host a short-term rental in residential areas? A host can include a property owner or a principal tenant.

The majority of respondents support STR units where the host lives in the unit, or on the property, and do not support STR units where the host does not live on the property. People tend to have greater concern over STR when the host is not present. This theme reoccurred in comments throughout the survey.



Question 3. *If the municipality were to explore a By-law to regulate short-term rentals what considerations would be most important to you? Please rank each consideration on a scale of 1 to 5 (where 1 is not important at all and 5 is very important).*

Considerations:

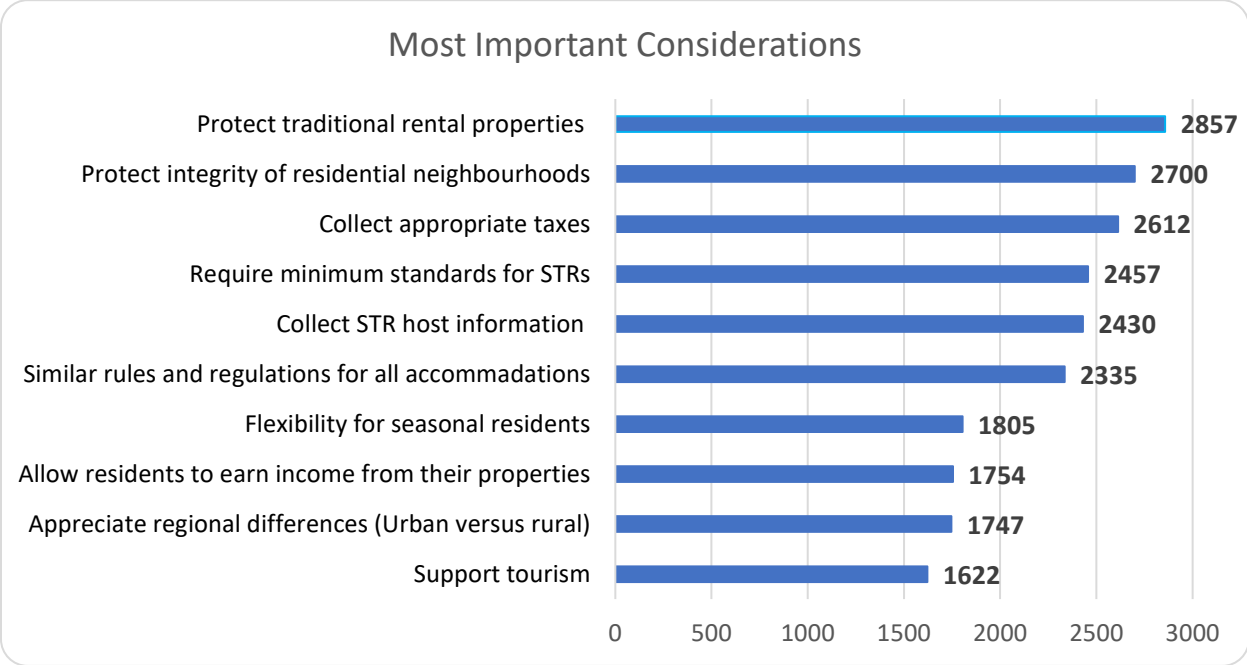
- Protect traditional rental properties
- Protect integrity of residential neighbourhoods
- Require minimum standards for STRs
- Collect appropriate taxes
- Collect STR host information
- Similar rules and regulations for all accommodations
- Flexibility for seasonal residents
- Appreciate regional differences (urban versus rural)
- Allow residents to earn income from their properties
- Support tourism

Response:

Respondents indicated these considerations as the five **most important** when discussing STR regulation:

1. Protect supply of traditional rentals
2. Protect integrity of residential neighbourhoods
3. Collect appropriate taxes
4. Require minimum standards for STRs
5. Collect STR host information

The top considerations were determined by totaling the number of respondents who indicated “important” (4) or “very important” (5) for each of the 10 considerations. The graph below reflects these totals and does not indicate all responses. Many indicated neutral, or that some considerations were not important. The top three considerations above also received the highest numbers of “very important” responses, and “Protecting supply of traditional rentals” showed the strongest response; this consideration received the most “Very Important” with comparatively few other responses.



Question 4. *Are there other considerations that you would like to see included in the By-law discussion?*

Response:

Most responses to this qualitative question reinforced the positions indicated in Question 3. General themes include:

- Protecting residential neighbourhoods, and the supply of long-term rental housing
- Limiting the overall number of STR, the number of days an STR unit is rented, and the number of properties per host. Many responses indicated “commercial operators” or corporate entities should be limited
- Collecting appropriate taxes
- There were a minority group of responses advocating a free market approach with no regulation or additional taxes.

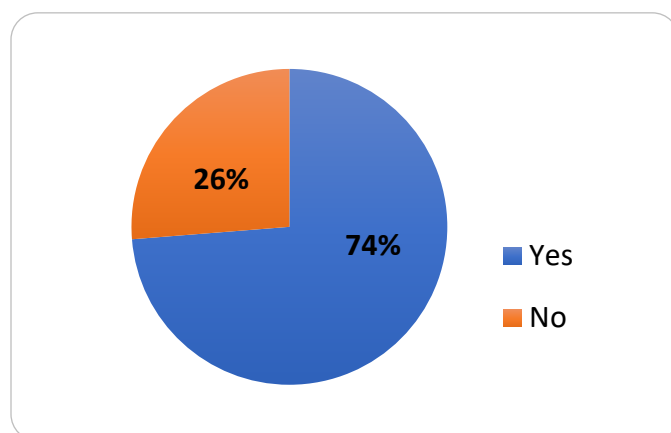
Many respondents indicated that the rules for STR should not be the same everywhere, more specifically that rural areas should have more flexibility to operate STR. Many also highlighted that the income from STR has helped them to afford their home.

How do you use Short-Term Rentals?

Question 5. *Have you ever stayed at a short-term rental?*

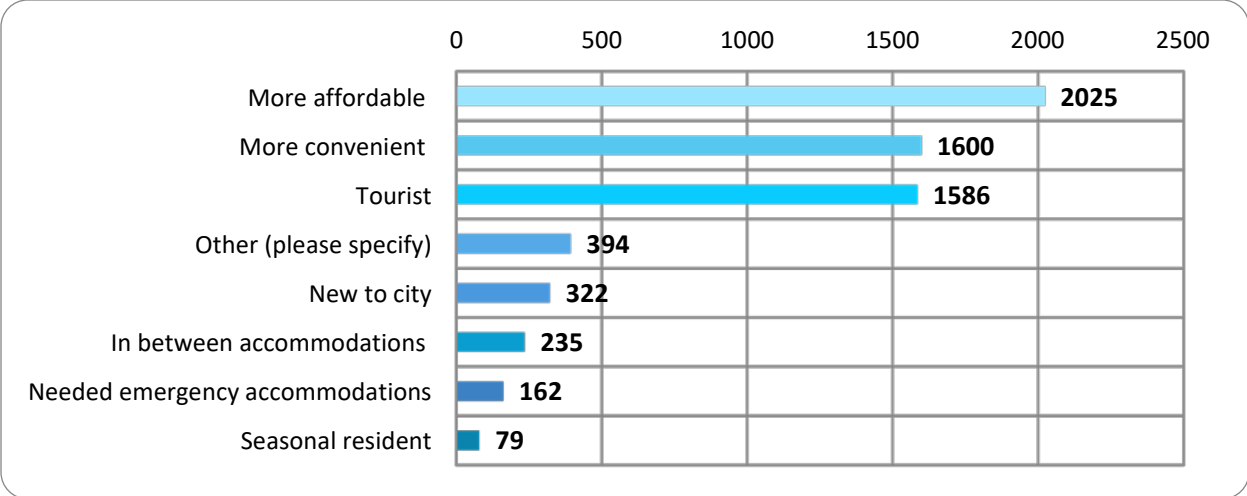
Response:

Almost $\frac{3}{4}$ of respondents have themselves stayed in a short-term-rental.



Question 6. *Why did you stay at a short-term rental? (select all that apply)* Question 6 was directed only to those who indicated they have stayed in an STR before.

Response: Most respondents use short-term rentals while travelling as tourists. Affordability and convenience over traditional tourist accommodations (hotel, motel, hostel, BnB) ranked as the highest reasons to use short-term rentals. The graph below shows how respondents answered.



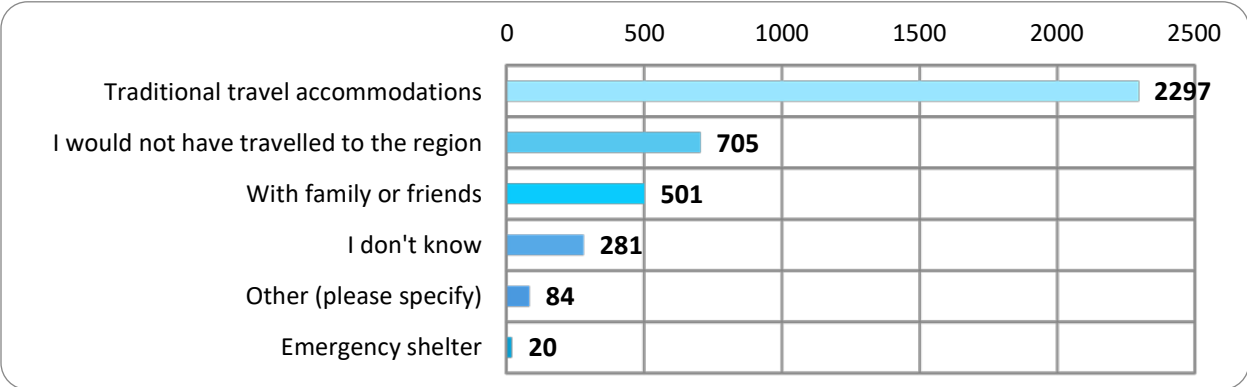
Among those who responded “other”, several themes emerged. Common themes that were not addressed above include:

- More interesting experience than hotels, offers a better sense of the city, and an opportunity to live like locals;
- No other accommodations available, particularly because the destination was in a small town, rural, or remote location; and
- Required amenities difficult to find in a hotel, such as lots of extra space or a kitchenette.

Question 7. *Where would you have stayed if a short-term rental had not been available?* Question 7 was directed only to those who indicated they have stayed in an STR before.

Response:

Most respondents would choose traditional travel accommodation or stay with family or friends if short-term rentals were not an option. However, 18% (705) indicated they would not travel to the region if short-term rentals were unavailable. The graph below shows how respondents answered Question 7.



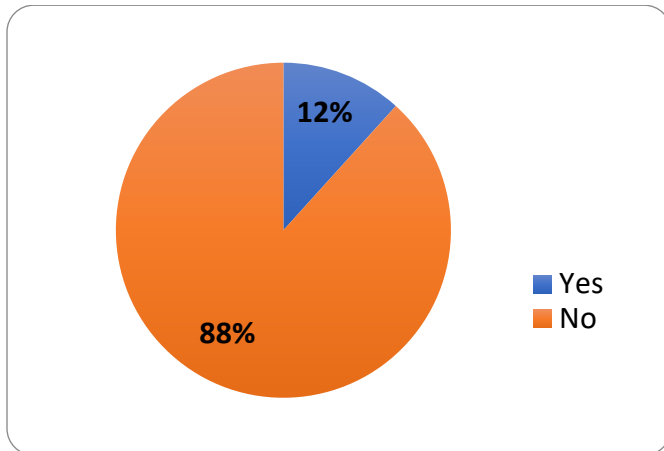
Among those who responded “other”, many reiterated that they would have chosen some type of traditional travel accommodation like a hotel, motel or hostel. Secondary themes emerged, including:

- Would have had to stay someplace much further away
- Would have considered camping options

- Would have looked for University summer residence
- Might have looked for a house sitting or homestay arrangement.

Question 8. *Are you a host or have you been a host of a short-term rental?*

Response: The majority of people who answered the questionnaire are not STR hosts. 12% of respondents (461) were themselves STR hosts.

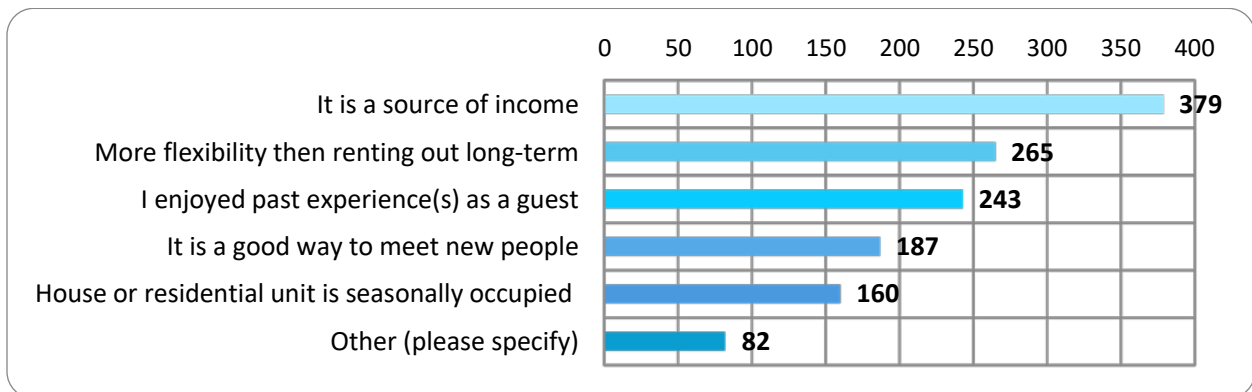


Question 9. *Why are you a host or why were you a host of a short-term rental (Select all that apply)?*

Question 9 was directed only to those who indicated they were a STR host.

Response:

For those who are STR hosts, each response was prevalent. The top reason for hosting was because it is a source of income, followed by flexibility over long-term renting. The third most common reason for hosting was having an enjoyable experience as an STR guest. The graph below shows the results for each consideration.



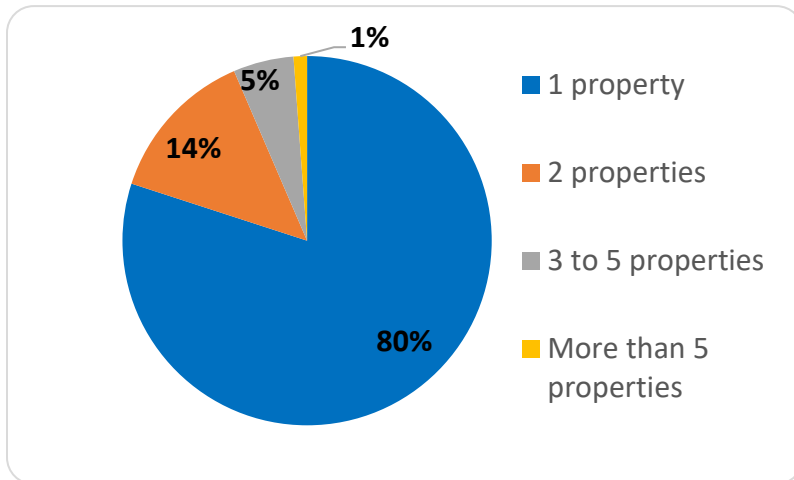
Respondents who chose “other” tended to reiterate selected answers. With respect to increased flexibility, some hosts explained a STR was less hassle and less risky than taking on long-term tenants. Several hosts indicated they have a rural or seasonal property which sits empty for a portion of the year.

Question 10. *How many short-term rental properties do you own?* Question 10 was directed only to those who indicated they were a STR host

Response:

The majority of responses owned one STR property. Approximately 1% owned more than 5.

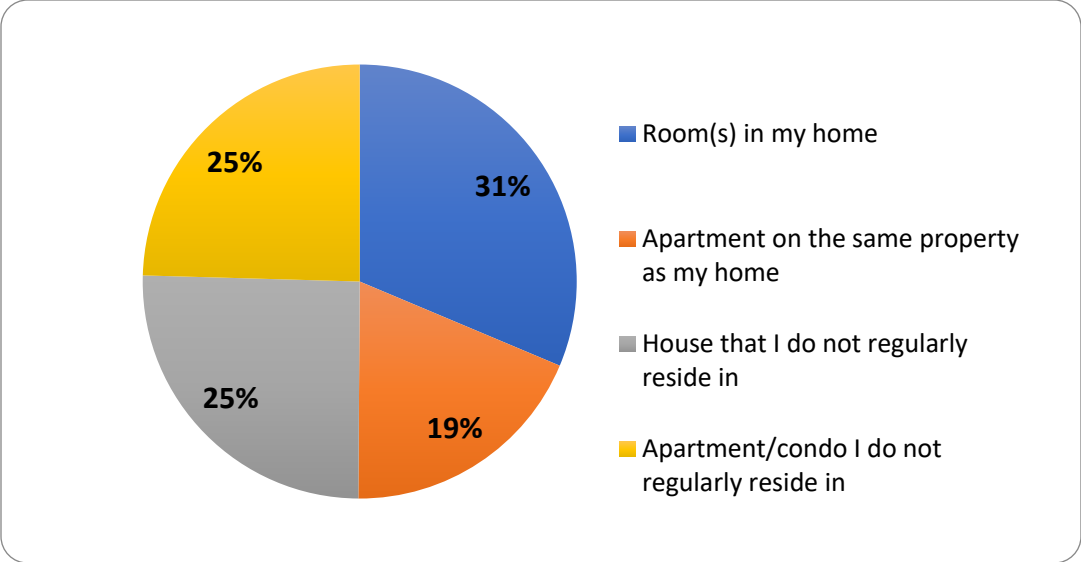
- Four respondents owned more than 10 properties.
- The highest number of properties reported was 60.



Question 11. *Please describe your short-term rental (select all that apply if you host several types of short-term rentals).* Question 11 was directed only to those who indicated they were a STR host.

Response:

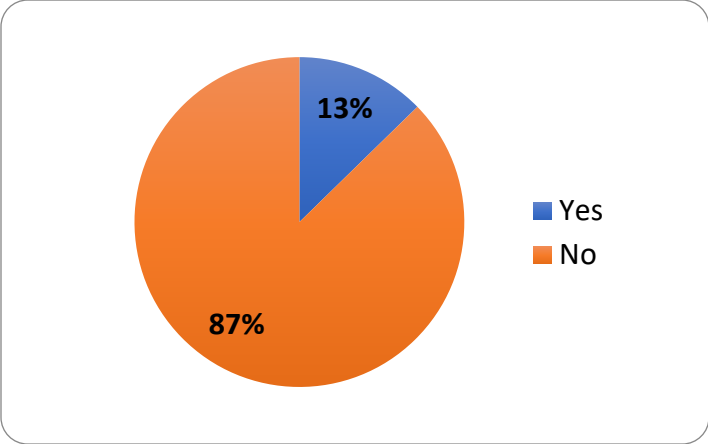
Approximately 69% (344) of the respondents who self-identified as hosts have a STR outside of their principal residence. 50% (250) are not located on the same property in which the host resides.



Question 12. Do you use a management company for your short-term rental? Question 12 was directed only to those who indicated they were a STR host.

Response:

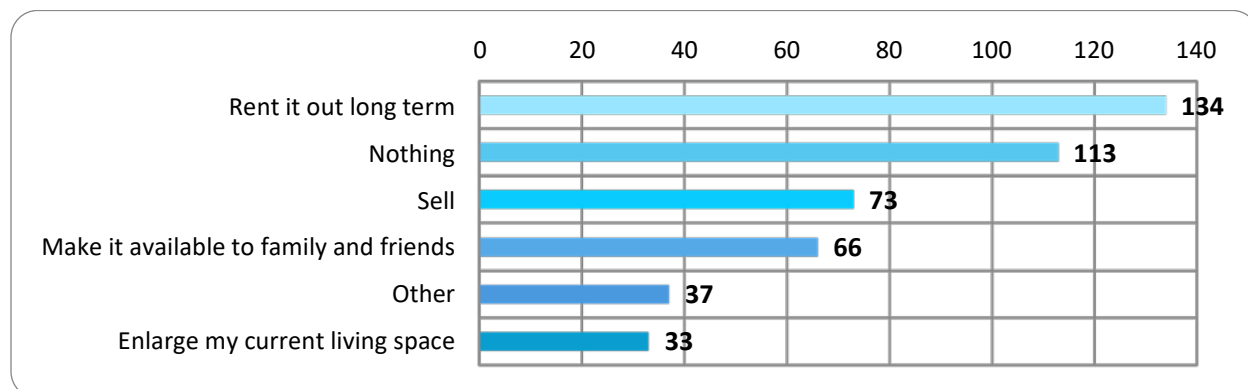
Most of the responding hosts do not use a management company to help operate their STR. Approximately 13% do use a professional management company.



Question 13. How would you use your unit/rooms if it were not used as a short-term rental? (Choose one option). Question 13 was directed only to those who indicated they were a STR host.

Response:

The most common response was “rent it out long term” (143), followed by “nothing” (113). 73 Respondents indicated they would have to sell the unit.



Respondents who chose “Other” frequently commented:

- Current landlord tenant laws would discourage them from renting their unit long term
- Would not consider renting to long term tenants because of bad experiences
- Would rent the unit as a furnished suite

Question 14. As the host of a short-term rental, how do you feel about the following types of regulations found in other areas? In your opinion, would they have a positive or negative impact on the short-term rental industry in the region? Question 14 was directed only to those who indicated they were a STR host.

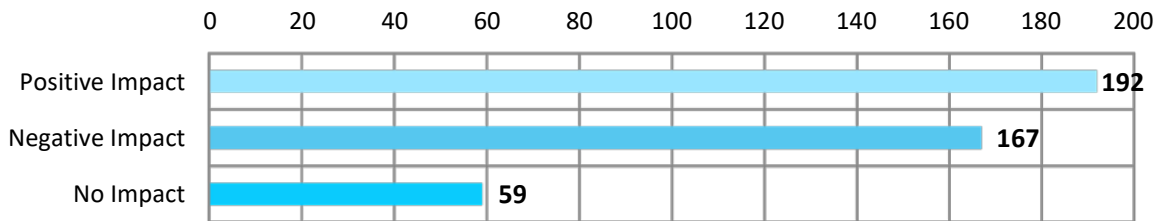
Response:

Short-term rental hosts have mixed feelings about regulations. The only type of regulation which received more positive than negative feedback, by a small margin, was requiring units to meet similar safety and accessibility standards as tourist accommodations. Respondents indicated that most forms of regulation would have a negative impact on the STR industry. The least popular type of regulation was requiring zoning for STRs, followed by restrictions on the length of time units can be rented. However, feedback was split on whether no regulation would be positive or negative. A slight majority indicated that having no regulation would have a negative effect. Feedback was also quite evenly divided over restrictions on who can host a STR, such as principal residence requirements or limits on the number of STRs under the same ownership.

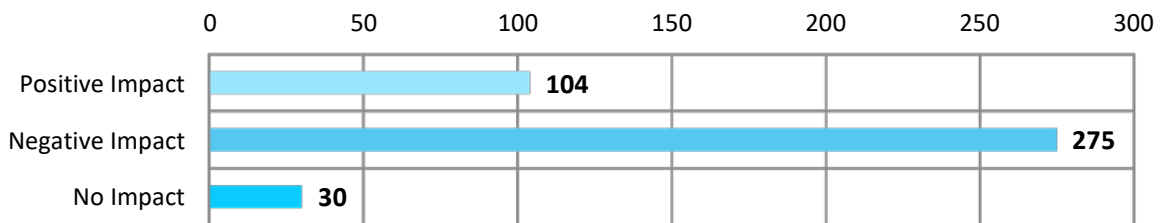
124 hosts responded “other” and offered written comments regarding regulations. Themes that emerged in this set of comments included:

- Hosts need the money generated by the STR unit and are concerned regulations would have a negative impact on their income earning ability
- Many comments acknowledged that STR are negatively impacting housing availability and recognized the need for some regulation. These comments tended to suggest regulating commercial operations where hosts do not live on the property or operate multiple units.
- A subset of comments expressed concern that rural areas would unfairly be regulated the same way urban areas are

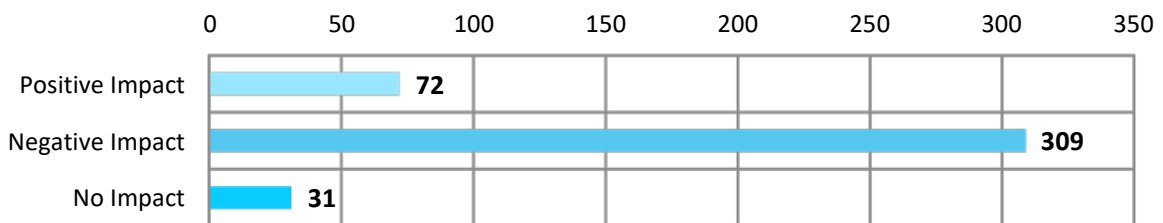
The unit must meet similar standards as per traditional tourist accommodations



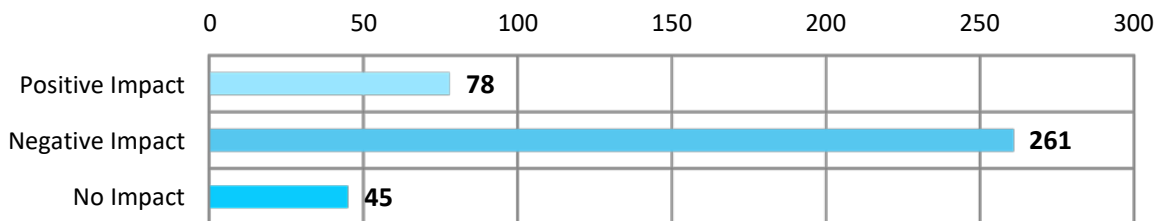
Charging a tax or levy as per traditional tourist accommodations

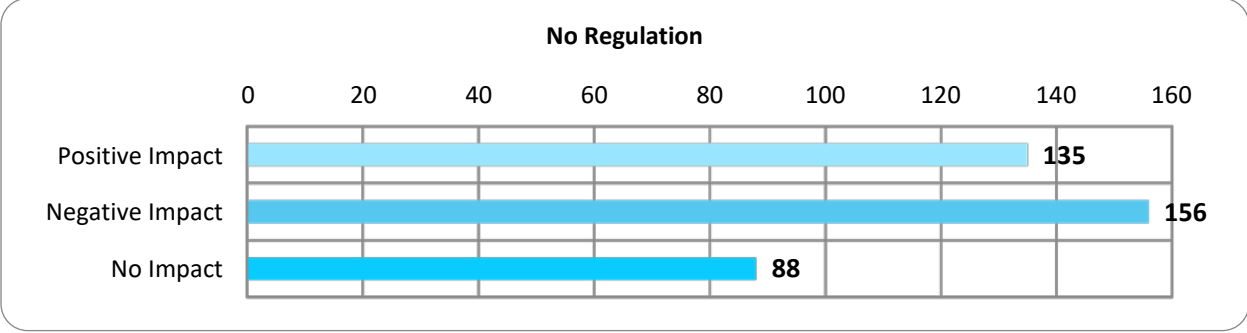
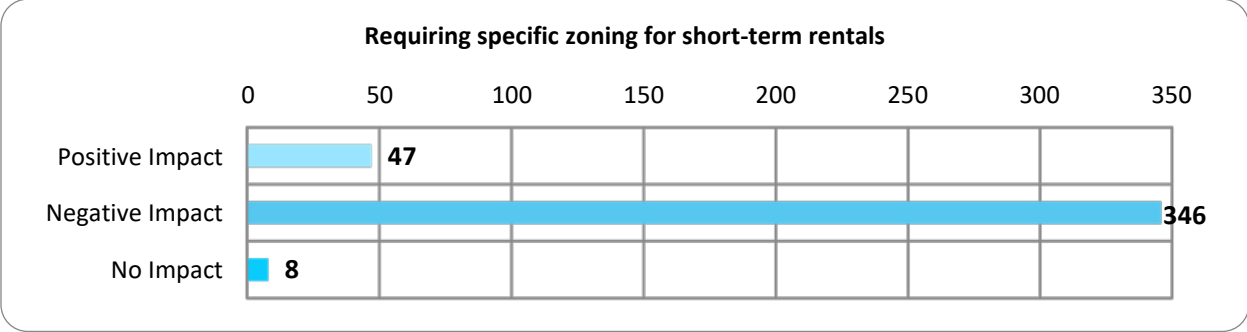
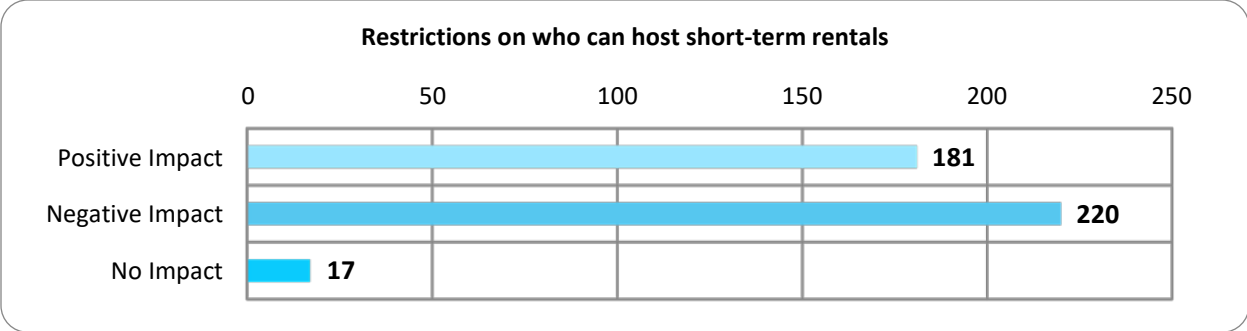


Restrictions on the length of time that units can be rented



Restrictions on the size of the short-term rentals (eg. number of rooms in a house)



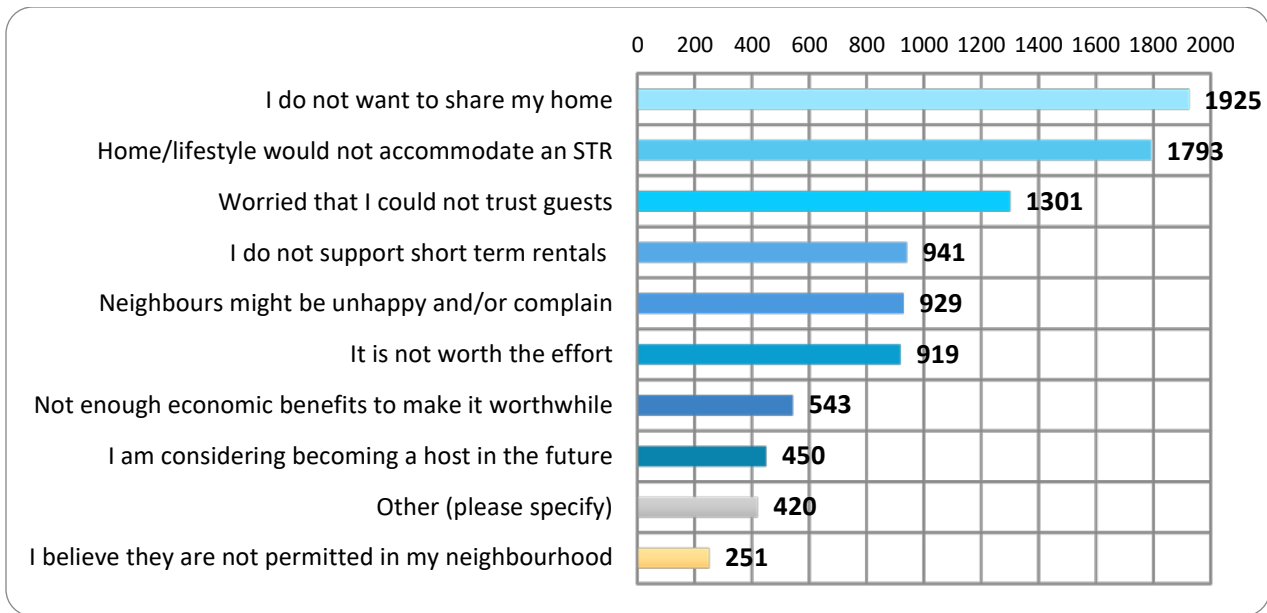


Question 15. Why aren't you a host or why haven't you been a host of a short-term rental? (select all that apply)

Response:

The most common reason not to be a STR host is “I do not want to share my home”, followed by “My home/lifestyle would not accommodate a short term rental”.

Respondents who selected “other” noted a wide variety of barriers to becoming a STR host. The most notable theme was respondents who indicated they are renters or do not own their home and are prohibited by their lease or landlord from operating a STR. Many renters indicated the size of their unit was a practical barrier to operating an STR, or that they had no other place to stay if they were to become an STR host. These comments align with the second most popular response “because my home/lifestyle would not accommodate a short-term rental”. The chart below plots the frequency of each reason chosen.

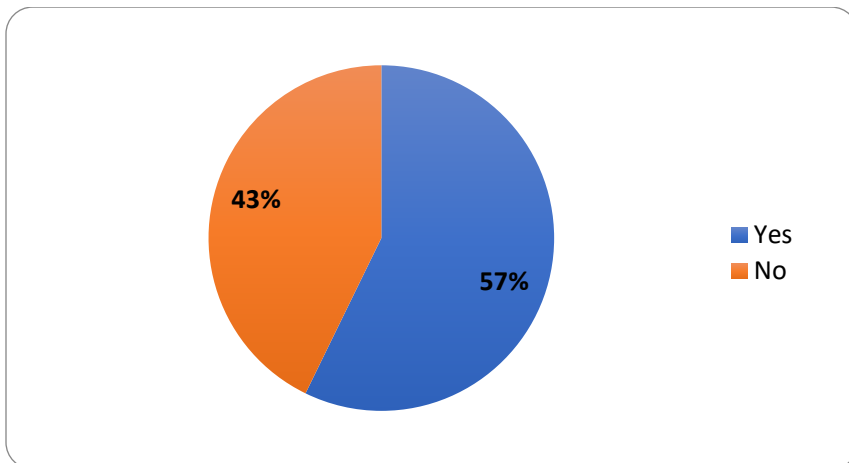


How Have You Been Impacted by Short-Term Rentals?

Question 16. Are you aware of any short term rentals in your neighbourhood (include your short-term rental if you are a host in your own neighbourhood)?

Response:

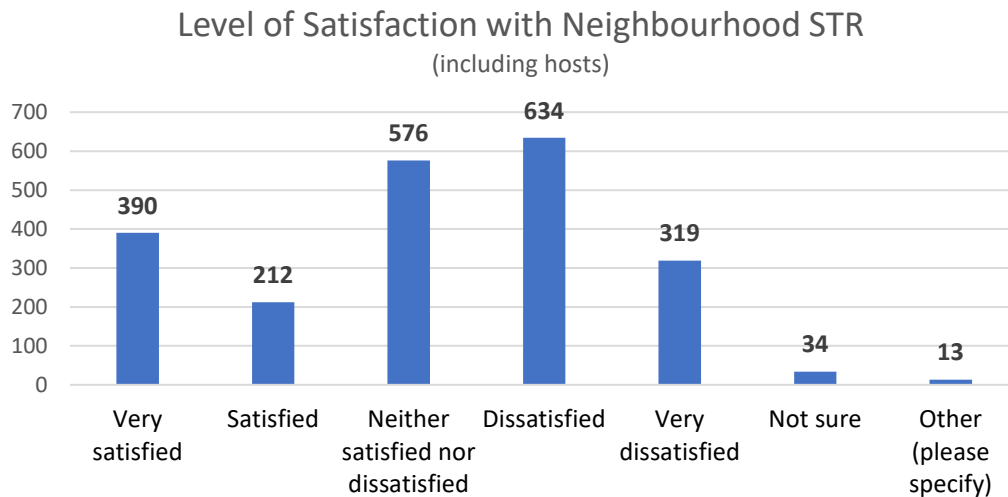
A little over half (57%) of the respondents indicated they were aware of STRs in their neighbourhood. This includes hosts who are aware of their own STR. The percentage of those who responded yes to this question slightly decreases to 53% when not including responses from hosts.



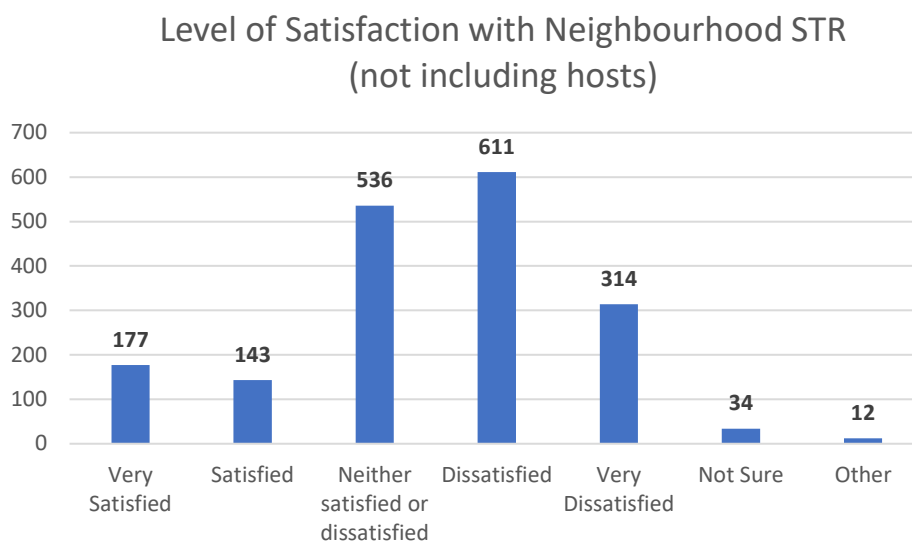
Question 17. As a neighbour or host to one or more homes being used as a short-term rental, which of the following statements best describes your personal experience (Choose one option). Question 17 was directed only to those who indicated they are aware of an STR in their neighbourhood (including their own).

Response:

Approximately 44% of respondents who were aware of a STR in their neighbourhood expressed dissatisfaction with their experience, approximately 26% were neither satisfied or dissatisfied, and 28% expressed satisfaction.



When removing responses from those who identified as hosts approximately 52% of respondents who were aware of a STR in their neighbourhood expressed dissatisfaction with their experience, approximately 30% were neither satisfied or dissatisfied and 18% expressed satisfaction.



Comments from the other category were mainly regarding negative impacts associated with STRs referenced earlier in questionnaire including noise, neighbourhood compatibility and impacts to long term rentals.

Question 18. *In your experience, how have the short-term rentals in your neighbourhood affected you in regard to the following?* Question 18 was directed only to those who indicated they are aware of an STR in their neighbourhood (including their own).

Response:

Respondents were asked to rate the impact STRs have on 10 different factors, according to their own experience. The majority of respondents indicated there were either negative impacts or no impact on the majority of items.

Some factors had a larger concentration of those who indicated a negative impact including:

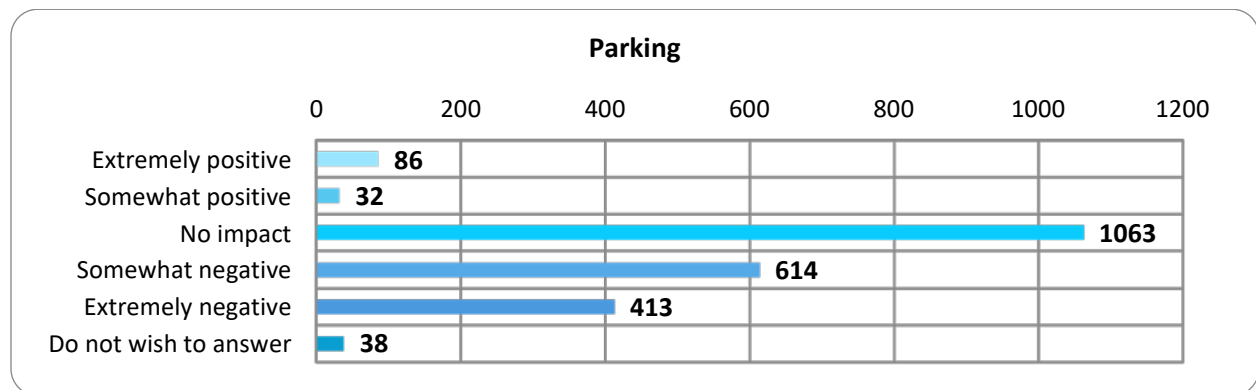
- rent prices where 55% respondents noted a negative impact vs 35% who noted no impact; and
- availability of traditional rental properties 64% noted a negative impact vs 27% who noted no impact.

Some factors had a larger concentration of those who indicated a no impact including:

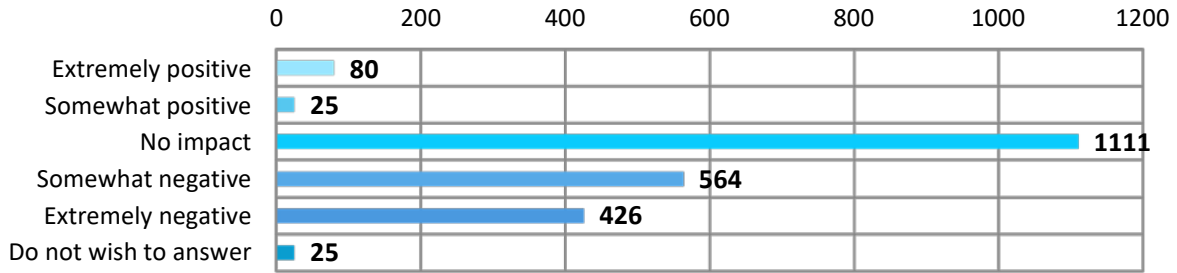
- neighbourhood commercial uses where 48% of respondents noted no impact vs 13% who noted a negative impact; and
- sense of safety where 50% of respondents noted no impact vs 40% who noted a negative impact

While those who indicated positive impacts generally made up approximately 5% of responses, there were some categories where larger positive responses were received including:

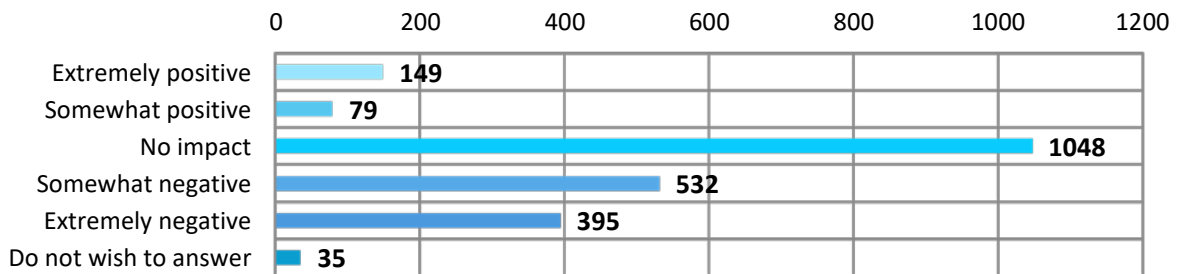
- Property maintenance where 10% of respondents noted a positive impact
- Property values where 16% of respondents noted a positive impact; and
- Sense of Community where 9% of respondents noted a positive impact
- Neighbourhood commercial uses where 31% of respondents noted a positive impact



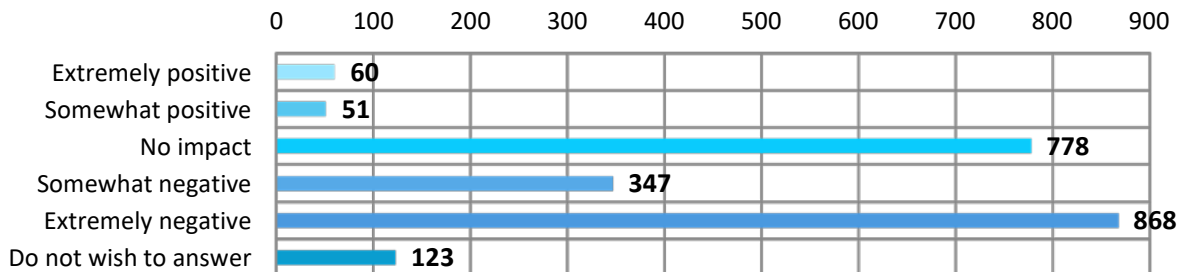
Noise



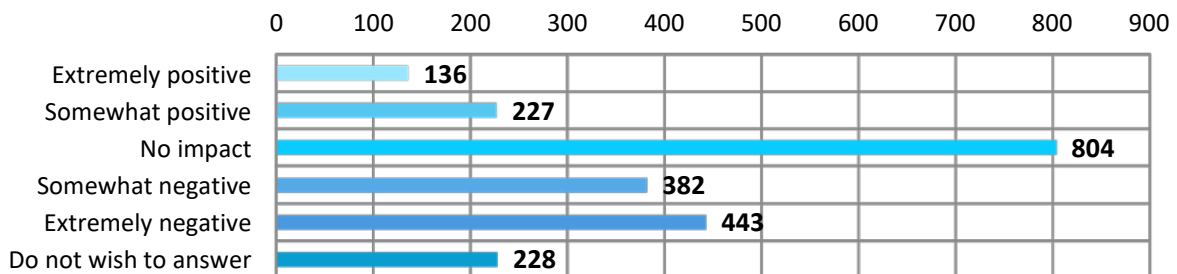
Property maintenance



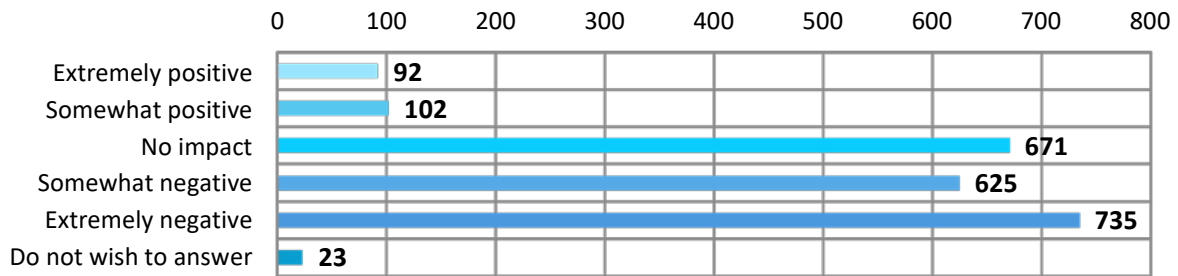
Rent prices



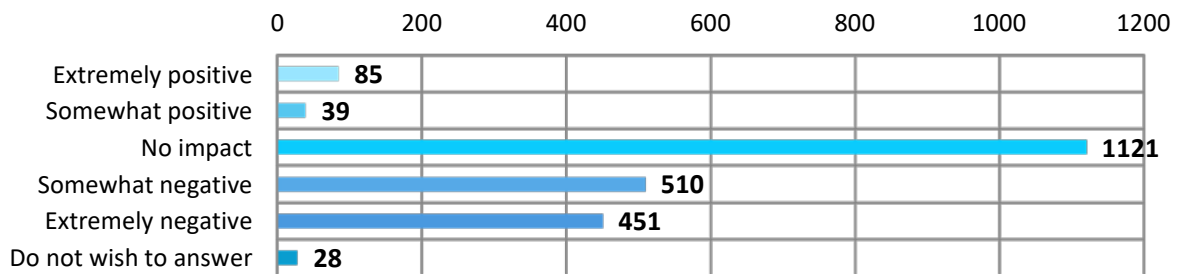
Property values



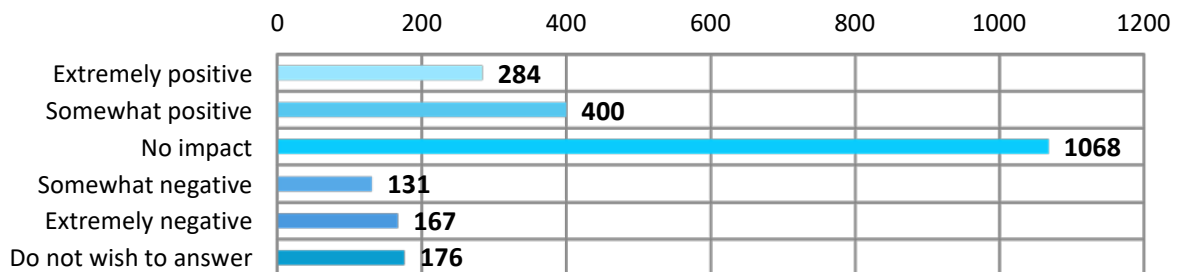
Sense of community (knowing your neighbours)



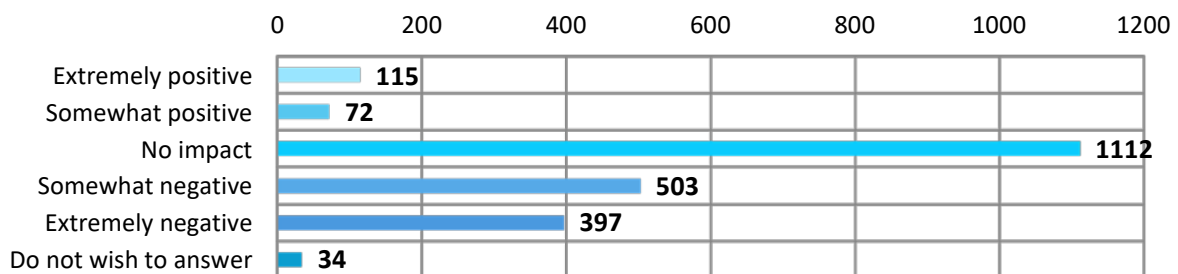
Privacy

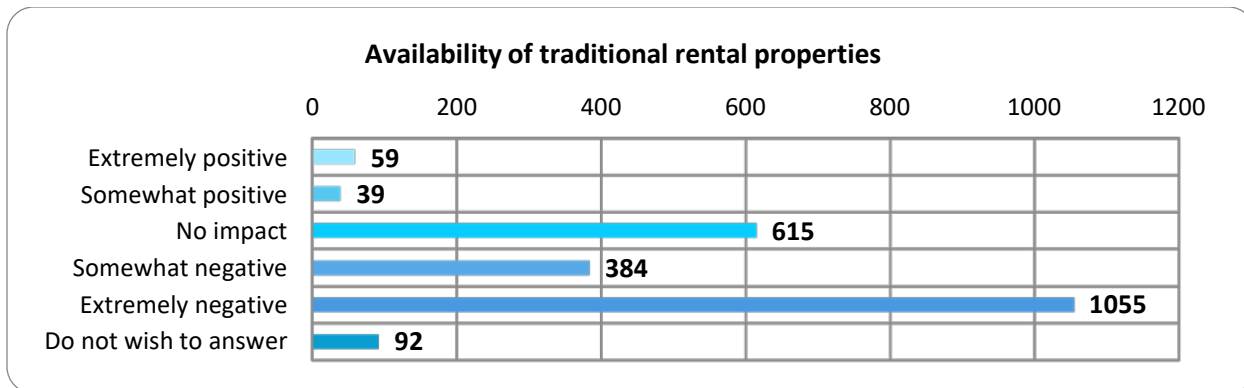


Neighbourhood commercial uses



Sense of safety





When responses from STR hosts are removed from the data, the majority of responses still express either negative impacts or no impact, however, the percentage of negative responses increased. The only factor where there was a notable difference in responses was the sense of safety factor. When removing responses from host there was an equal distribution of those who felt it had a negative impact and those who felt it had no impact (47% each). When including hosts there was a 10% difference in favour of no impact.

Question 19. *Any additional thoughts regarding short term rentals?*

Response:

More than 1500 respondents offered general comments on short-term rentals. Staff reviewed the comments and identified 7 key themes, shown below in order of frequency which they appeared. Examples of comments from each theme are provided below.

1. Regulation Needed

The greatest share of comments call for some type of regulation. Generally, they do not specify regulatory measures, but simply expressed the need for regulation of STR.

Sample Quote: "I don't disagree with short-term rentals. I just think it needs to be more regulated"

2. Housing Loss

Hundreds of comments express concern over the loss of long-term housing to short term rentals.

Sample Quote: "I don't think they should be gutted completely, but I think the local population needs some help to keep rental properties available, and houses to buy (specifically for first time home buyers)".

3. Community Impact

A large group of comments express concerns about noise from parties, increased nuisance or illegal activities, increased traffic, garbage, personal safety, and loss of community due to transient guests replacing long term residents.

Sample Quote: “We like the neighbourhood because it was family friendly and then a short term rental popped up next door. It has been extremely disruptive, uncomfortable, and upsetting. We've called the police and number of times because of noise complaints and in one case the guest was arrested. It has been an extremely upsetting experience.”

4. Limit Commercial Operators

These comments express concern over hosts who do not live on the property, or have multiple entire home properties, or clusters of private rooms functioning as STRs.

Sample Quote: “I feel strongly that owners of short term rentals must live on the property (primary residence) to offer rooms and/or units within the building for short term use. I do not support short term rentals in urban areas where property is run as a short term rental business where owner has multiple properties. Those are hotels and should be regulated and taxed in same fashion.”

5. Fair Taxation

Comments under this theme express concern that some STR operators do not pay appropriate taxes. Many feel that STRs should be taxed “on a level playing field” with hotel and bed and breakfast operations.

Sample Quote: “Owners of traditional tourist accommodation sites are subject to stringent controls and taxation, none of which currently apply to those renting properties on a short-term basis. Some balance is desperately needed.”

6. Do Not Regulate

A subset of comments express free market values and suggest that government should not control what owners do with their property.

Sample Quotes: “If a person owns a property, why does its use need to be regulated by the government? We do not need to be parented to this level.”

“The city has been hard on landlords for years. Now that landlords finally have a way to fight back, government is going to stick their nose in and make it illegal? Typical.”

7. Ban Short-Term Rentals

Another subset of comments voiced a preference to ban STR operations, expressing that the impact on communities is too great to allow them to continue.

Sample Quotes:

"Best case scenario, they are banned outright. Barring that, they should be regulated in the same way hotels and traditional BnBs are and there should be a CAP on them. There is already a housing crisis on the peninsula, let's not work to make it WORSE."

"Ban them. They are community cancer."

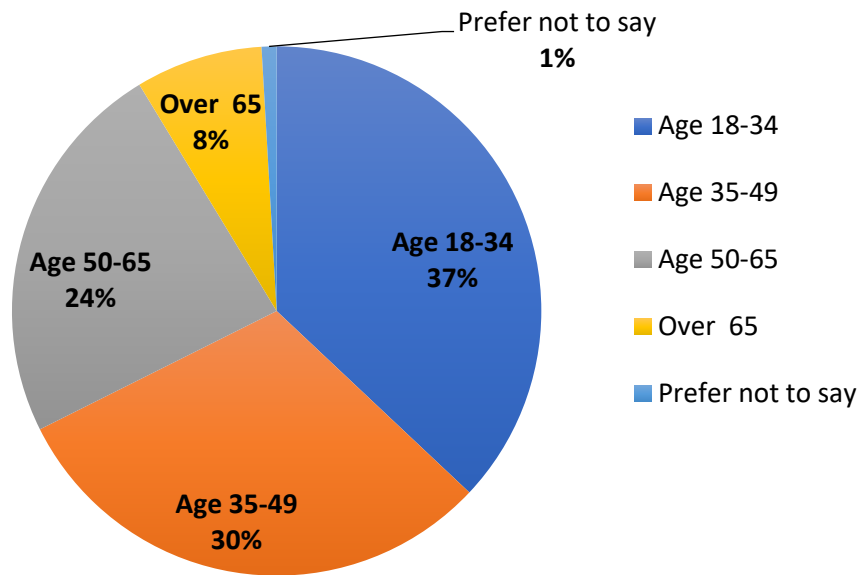
"Should be banned as it makes it extremely hard for low to moderate income people to rent houses or apartments."

Tell Us a Bit About Yourself

Question 20. *Which age group do you fall in?*

Response:

A wide range of age groups engaged in the questionnaire. 18-34 year-olds made up the largest groups of responses, followed by 35-49 year-olds. The younger age of respondents may stem from the online medium and promotion of the survey through the municipality's social media platforms, which tend to see more engagement from younger audiences.



Question 21. Please provide the first three digits of your postal code

Response:

Residents from across HRM engaged in the questionnaire, with the highest response rates from Halifax Peninsula North residents (790) and Halifax Downtown South residents (650). Dartmouth Centre and Halifax Bedford Basin West were the next highest, with approximately 200 responses each. Schedule 1 displays the number of responses by postal code boundary (first three digits), with district boundaries overlaid in colour.¹

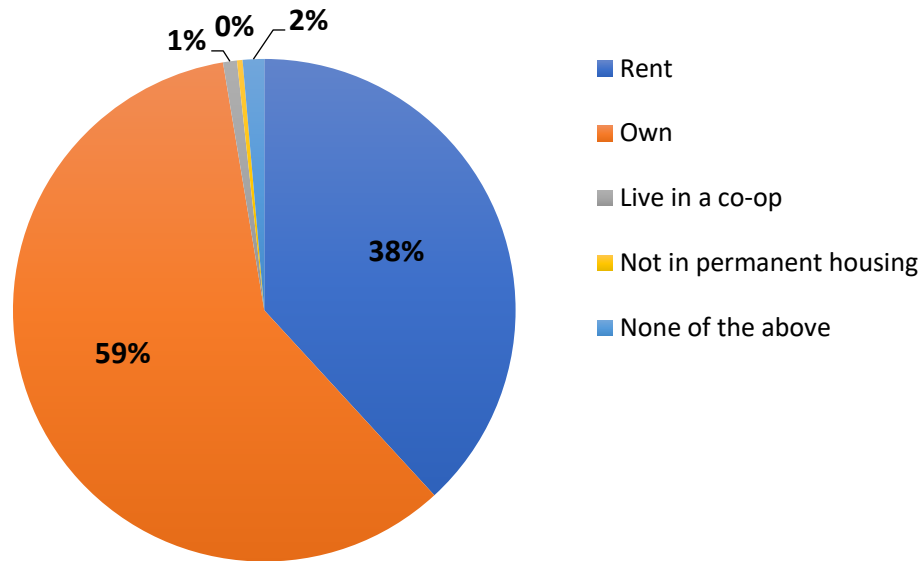
More than 25 responses indicated they reside outside of Nova Scotia; only 5 of these identified as STR hosts.

Question 22. What best describes your housing situation?

Response:

¹ **NOTE:** The B0J postal code covers unconnected areas in HRM and beyond including the Eastern Shore beyond Three Fathom Harbour, and Queensland on the South Shore.

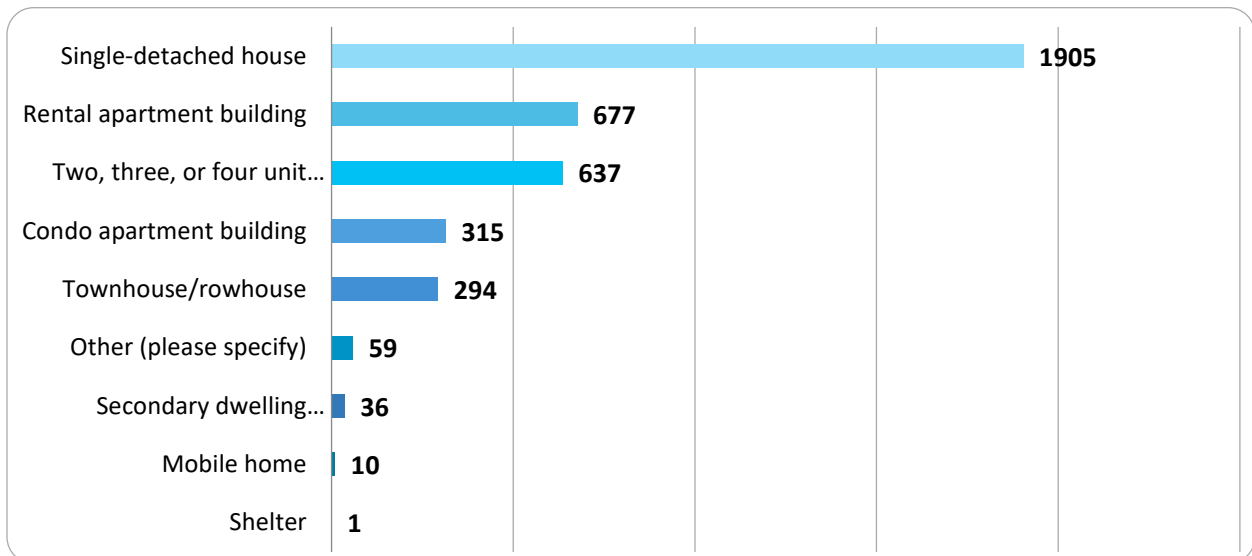
Owners made up the largest group of responses at 59%, while 38% were renters. The pie chart below shows the number of participants and percentage of the total.



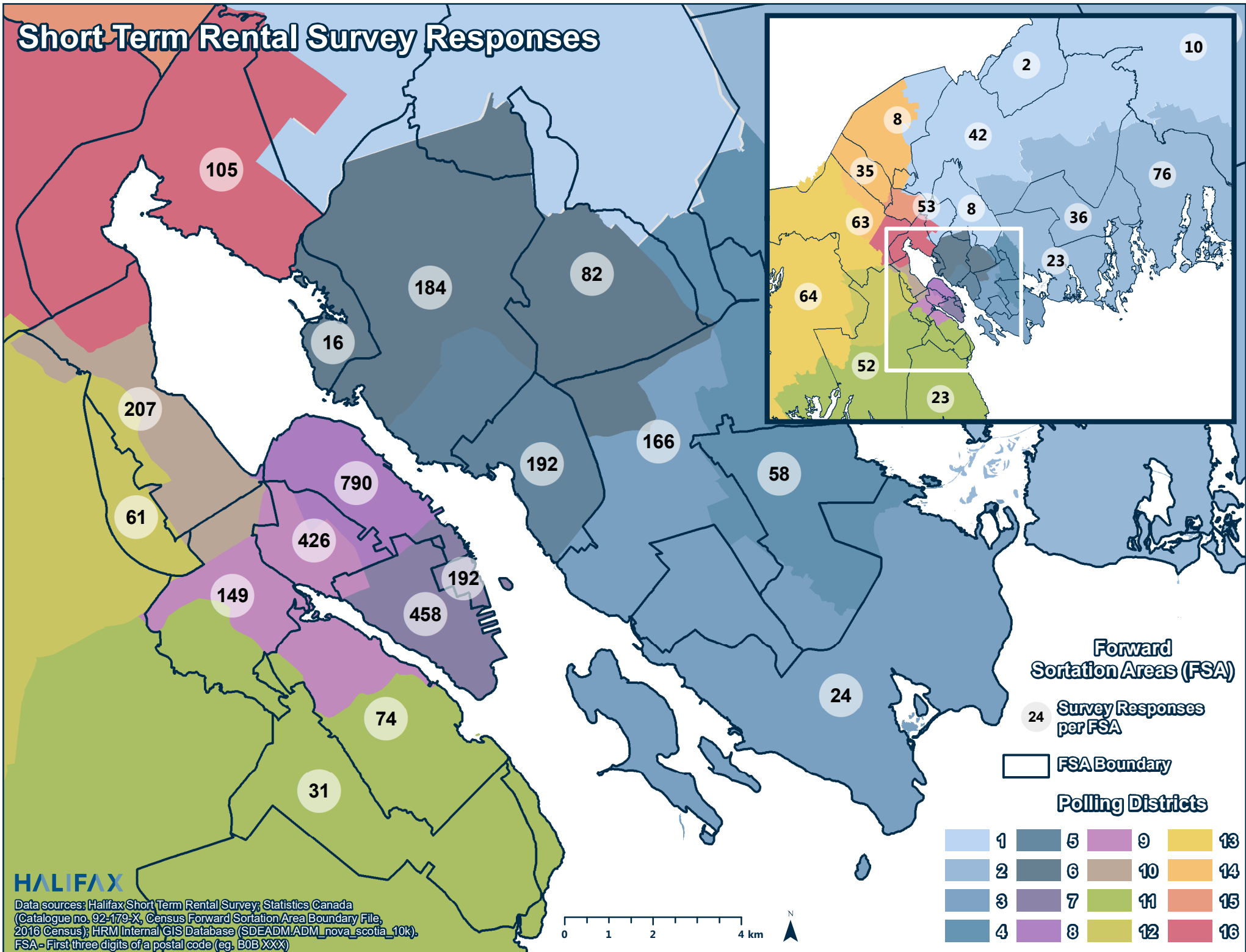
Question 23. *What type of dwelling do you currently live in?*

Response:

A large majority of respondents live in single-detached homes, with rental apartments and multi-unit houses the second and third most common. Respondents typically used the “Other” option to describe their dwelling in greater detail. Semi-detached homes, or duplex were a common theme under “Other”.



Short-Term Rental Survey Responses



HALIFAX

Data sources: Halifax Short-Term Rental Survey; Statistics Canada (Catalogue no. 92-179-X, Census Forward Sortation Area Boundary File, 2016 Census); HRM Internal GIS Database (SDEADM/ADM_nova_scotia_10k). FSA - First three digits of a postal code (eg. B0B XXX)

0 1 2 4 km



Attachment C - Short Term Rental Jurisdictional Review

	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
Toronto	180 days for entire homes. Up to 3 bedrooms in a unit for an unlimited number of nights (less than 28 consecutive days)		Up to 3 bedrooms. Entire home can only be rented if owner is away and to a max of 180 days.	STR operator must register - \$50 fee. Companies such as Airbnb must pay a one-time licence application fee of \$5,000 plus \$1 for each night booked through the company	4% Municipal Accommodation Tax applies.	Yes. Permitted in all housing types in residential and the residential components of mixed use zones	Yes, in both homeowners and tenant's principal residence.	Yes.	Permitted in secondary and laneway suites as long as the secondary suite/laneway suite is their principal residence. Owner or strata consent form. Fire and safety form.
Vancouver		A person may only have one short-term rental business licence – for the property where they live.	No Maximum number of rooms. No more than 2 people per bedroom.	Business License + Yearly fee of \$51.	Host must remit PST. The 3% municipal and regional district tax (MRDT) is levied on hotel room visits by the provincial government.	In general requirements. Is listed in zone if permitted.	Must be a principal residence.	STR are only permitted in secondary homes or basements suites if the operator lives there full time. Not permitted in accessory buildings such as garages or trailers.	Owner or strata consent form. Operators sign statutory declaration of compliance with fire/safety regulations. Must list license number on hosting platform and in unit. Operators must keep record of guests. Not permitted in Rental 100 buildings or homes that pay Empty Homes Tax.
Montreal			Some areas of the Downtown must have a distance of at least 150m between STR. Some areas of the downtown do not permit STR. Boroughs may also have different requirements.	Certificate of classification from province. Need one if your STR is not your primary residence. If renting out primary residence, you are not required to get a certificate. Registration number - \$50 and \$75.	Province levies tax each time accommodation is rented for a period of up to 31 consecutive days (3.5% accommodation tax)	Boroughs have their own regulations. Some boroughs restricted Airbnb to certain buildings along certain streets.	Yes.	Provincial regulations require resident to live on the property.	Strata consent required from condo board. Two sets of rules: One for primary residence and one for secondary residence. Business license must be noted on listing platform. Province has regulations that overlap with cities.
Ottawa				Register with the City and provide details on listing. Require a \$100 permit valid for two years, must follow rules related to consumer protection, health and safety, and community nuisances.	4% Municipal Accommodation Tax applies.	Zoning by-law currently prohibits short-term rentals of complete units in all residential zones	Residents will be able to rent out their primary residence. Renting out a secondary or investment property will continue to be illegal, except in rural areas.	Yes, except in rural areas.	The City will use revenues from the new registration and permit fees, and from the municipal accommodations tax, to enforce the rules. *Regulatory framework approved (Nov. 2019), but rules not yet approved by Council
Kelowna			Max of 3 sleeping units in single, two and multiple as primary use. No more than two adults per dwelling unit.	Business license. Annual fee. \$345 for principal residence and \$750 for non-principal residence.	Hosts must remit PST. The 3% municipal and regional district tax (MRDT) is levied on hotel room visits by the provincial government.	General Requirements in zoning by-law.	Yes. Limited to operator's principal residence within residential zones. One per lot.	Owner must reside on the lot for 240 days/year. If in a secondary suite or carriage house.	Owner or strata consent form. Must sign fire and safety attestation and good neighbour agreement form. Not permitted in secondary suite or carriage house. License number must be in Hosting Platform. No more than one booking is permitted in each dwelling unit

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									at one time. Select tourist areas will continue to allow short-term rental outside of an operator's principal residence
	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
Nelson		\	The maximum number of annual STR licences is 110 and the maximum number of four-month STR licences is 40. In residential zones, no more than three short-term rentals are permitted per block.	Yes. 3 types: Annual, 4 month, and 31 day licences. Fees range from \$160 - \$1591 depending on license type and number of rooms.	hosts must remit PST. The 3% municipal and regional district tax (MRDT) is levied on hotel room visits by the provincial government.	Section on STR in General Requirements. STR in commercial zones are licensed as "tourist accommodation", similar to Hotels.	Yes. Section on STR in General requirements		Interactive web app provides public info on licensed STR units, and shows how many are licensed per block.
Victoria			The whole home on occasion (for example, when you are on vacation), or up to two bedrooms in your home with shared kitchen and living space.	Yes. \$150 when short term rental is offered in operators' principal residence \$1,500 all other types of STR.	Hosts must remit PST. The 3% municipal and regional district tax (MRDT) is levied on hotel room visits by the provincial government	LUB has requirements in general provisions. Permitted as home occupation in principal residence.	Yes.	Under 30 days.	Need owner or strata consent form.
Tofino			Max is 6 guests. Max number of people per room is 2. A STR use may not be located within any dwelling unit that has more than three sleeping units or bedrooms in total;	Annual Business Licence Required	Must remit PST. The 3% municipal and regional district tax (MRDT) is levied on hotel room visits by the provincial government	Requirements for STR located in General Provision. Considered as a home occupation STR are permitted where single family is permitted.	By a Permanent Resident residing in a dwelling unit on the lot while the home occupation use is occurring	May be in Single Family, secondary suite or caretaker cottage.	Owners or operators of tourist accommodation businesses to display their valid licence number on any marketing, advertisements or promotions for the business. Max number of dwellings on a lot that can have a STR is 1.
Calgary			A host cannot allow more than two adults, not including minors per room.	Yes. Tier 1: 1 to 4 rooms offered for rent = \$100 per property Tier 2: 5 or more rooms offered for rent = \$172 per property plus the cost of a fire inspection of \$104 per property	A 4% Provincial tourism levy applies to STRs		No.	No.	Two-tiered business licence category for short term rental hosts. All hosts must have a separate short term business licence for each property they rent out. Host must include license number in any advertising of STR unit. Host must keep electronic record of guests No overlapping booking within the same dwelling.

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									Can be primary or secondary units. If secondary, must meet requirements of legal secondary suite.
	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
Los Angeles	120 days in primary residence where resident has lived for at least 6 months. Hosts may apply for be "extended home sharing license" to be eligible for more days per year	Hosts can only register and operate one home-sharing unit at a time in the city which must be their primary residence	No more than 2 overnight guests (not including children) are allowed per habitable room, during Home-Sharing activities	Yes, \$89 year. Extended home sharing is \$5,660. License application must list platforms to be used. License must be displayed on host platform. \$850 fee for review of extended home sharing license	14% transient occupancy tax for stays of 30 night or less. Per night fee. Per night fee is imposed by city. To be deposited into the STR Enforcement Fund	Separate ordinance (185931) In all zones where, residential uses are permitted.	Yes. Must be in primary residence. Cannot have multiple bookings at once.	Can have in accessory dwelling if the applicant demonstrates the accessory dwelling unit is the applicant's primary residence. Permitted in rentals with landlords approval	Prohibits apartment conversion. "Granny suites" are exempted. There shall be no use of sound amplifying equipment after 10:00 pm and no evening outdoor congregations of more than 8 people (excluding children) during Home-Sharing activities. \$1,000 per day fine is imposed on the hosting platform if it completed a booking without a valid city home-sharing registration number. Hosts required to keep records of stays for 3 years.
Denver	No.	No.	No maximum number of guests.	Short-Term Rental Business Licence. \$25/year License must be prominently listed in the rental advertisement. Application fee. Yearly fee (varies depending on number of rooms)	City Lodgers Tax (10.75%) & Occupational Privilege Tax (\$48/Year).	Requirements in LUB. Considered an accessory use. Must meet zoning requirements for accessory use.	Must be the applicant's primary residence. The applicant must provide proof of possession of the licensed premises. In the residential zone.	Yes. Only one licence per property. Is also possible in accessory dwelling unit if long-term renter lives there to and only one license per lot.	Not permitted in mobile homes, rec. vehicles or travel trailers. No exterior evidence and on sigh of 100 square inches. Shall not have rental to more than one party under separate contacts. Proof of insurance required. Does not include rental of a dwelling unit for meetings such as luncheons, banquets, parties, weddings, fund raisers, or other similar gatherings for direct or indirect compensation. Applicant must inform the Home Owners Association of intention to use the property as a STR prior to obtaining a STR license
Austin			Restrictions on the distance between type 2 STR: they may not be within 100ft of another type 2 STR Previously had occupancy limits, but these were struck	\$572 dollars (\$522 for the Licensing Fee and the notification fee of \$50.) \$313 for subsequent annual renewal	9% Municipal Hotel Occupancy Tax; 6% State Hotel Occupancy Tax	Yes. STR section. For non owner occupied: No more than 3% of units in a building in a non-commercial zone may be STR. No more than 25% may be STR in a commercial zone.	Non-owner occupied is only permitted in certain zones (Non-residential zone).		3 types: 1) Owner occupied. 2) not owner-occupied. 3) not owner-occupied multiple. 1) Owner occupied is associated with an owner-occupied principal residential unit. Use of a sleeping room and bathroom. No more than one partial unit which is limited to single party.

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			down by a State Appeal Court.						2) Not part of multi residential. Is not owner-occupied and is not associated with an owner-occupied principal residential unit. Includes all the unit. Can be secondary dwelling or secondary apartment. 3) Is part of a multifamily dwelling must be all of unit. Need proof of insurance. All STR advertisement must include the license number assigned by the city to the short-term rental. Ban on advertising.
	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
Chicago		Renting multiple STRs requires a specific “shared housing operator” license	No more than 6 dwelling units within any building, or one quarter of the dwelling units, whichever is less, may be used for STR	Yes. a) Shared Housing Unit Registration; and b) Vacation rental License \$250 every 2 years. Commercial Platform: \$10,000 + \$60 per unit listed	4% STR surcharge on the booking. 4.5% Hotel Accommodations Tax	Yes. According to Chicago Zoning Ordinance.	Yes, for single family homes, unless exception granted by Commissioner. Homes with two to four units, only primary residences can be rented and only one unit per building can be rented	Sets number of allowable units within a building. In SUD only primary residences can be rented. Multiple – up to 25% up to max of 6 can be rented.	Homeowners association must approve the dwelling unit for use as a vacation rental and identify all other units in the building approved for use as rental. 8% of surcharge revenue will be used for enforcement and administration. Remaining revenue used to fund supportive services and permanent housing for homeless families and individuals.
Nashville		If owner occupied - Includes the rental of an entire dwelling unit to a single party or individuals. Occupant shall not exceed number of rooms X 2 occupants.	Min. one bedroom with bathroom.	Requires Operating Permit. \$313 annual fee.	Collected by owner. 6% Municipal Hotel Tax \$2.50 per night/unit fee Sales Tax	Yes. Listed in permitted uses. Is permitted as an accessory use in some zones. New non-owner occupied STR are only permitted in certain non-residentially zoned areas	Owner-occupied residence.	Do permit non-owner occupied with required permit Or on a lot with an owner-occupied residence.	Two types – owner occupied, and non-owner occupied. Owner occupied is permitted as an accessory use in Residential zoned. Ownership must be confirmed by two documents showing owner in fact occupies dwelling. Not owner occupied - rental are limited to a single party. Non-owner occupied must match deed as recorded in county office.
New Orleans	90 rental nights per licence year, unless licensed as commercial STR.	Varies depending on permit.	Residential STR (RSTR-Partial): up to 5 bedroom per unit Residential STR (RSTR-Small) Residential STR (RSTR-Large) Commercial STR (CSTR)	Each STR Unit must have both an Owner and Operator licence associated with it. Residential STR must also have a valid Homestead Exemption 1. Owner Permits: annual fees range from \$150-\$500 for residential STRs, and	City charges Sales Tax of 5%. STR Equalization Occupancy Tax 6.75% Occupancy Fees - Residential STR \$5/night - Commercial STR \$12/night	Yes. Properties in commercial or mixed-use zoning districts are eligible for a CSTR Owner permit Properties in residential zoning districts are only eligible to have an RSTR Owner permit.	Owner-occupant shall occupy the dwelling and be present during any STR occupancy.	Not permitted in accessory building. Accessory STR are prohibited in the French Quarter.	There is one Commercial STR (CSTR) designation; there are three Residential STR designations: - Residential STR (RSTR-Partial): - Residential STR (RSTR-Small) Residential STR (RSTR-Large) Type of RSTR permit an owner needs to get depends on the building type designation for the property. Use of the STR for any commercial or social events is prohibited.

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				<p>\$1000 for Commercial STRs</p> <p>2. Operator permits</p> <p>3. STR Platforms pay an annual permit fee of \$10,000</p>					
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	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
New York City		Yes.			5.875% Municipal Hotel Room Occupancy Tax \$2 Municipal charge per day/room (charge graded based on room rental price) \$1.50 State fee per day/unit	Short-term rentals are illegal except when owner occupied (Class A multiple dwellings)	Yes. May have up to two paying guests		State law prohibits the advertising of an apartment in a Class A multiple dwelling with 3 or more permanent residential units for less than 30 days
Portland, Oregon	Type B STR – owner must reside in dwelling at least 270 days of each year. There is a maximum of 95 days (3 months) per year where the resident does not need to be present.		Type A Accessory STR – no more than 2 rooms are rented to no more than 5 overnight guests. Type B Accessory Short-term Rental – between 3 and 5 rooms.	Rental permits are required. \$196. renewal is \$65. In multiple unit building fee is \$105 & renewal is \$65	1.8% state lodging tax. Transient Lodging Taxes - City of Portland: 6% (5% to City general fund; 1% to Travel Portland), and Multnomah County: 5.5% (2.5% Convention Center Phase II, .275% hotel operators, 2.725% Convention Center Phase I)	Yes. Called Accessory STR as it is accessory to main use of dwelling.	Yes. Owners and renters in owner’s residence only.		2 Types of STR. 1) Type A Accessory STR. Owner resides and only a part of the dwelling unit is used for STR purposes. 2) Type B Accessory STR. Letter must be mail out to neighbours within 150 feet in the area stating a STR is being located in the dwelling. A Conditional Use Review approval is required. Bedrooms in legal detached accessory structures can also be rented to overnight guests. Renters can have STR but need approval from owner.
San Francisco	None if you reside in dwelling. When you are not home overnight at the same time as your guest. There is a 90-day limit on the number of rentals per day. Renters cannot make more than monthly rent. Owner must reside in dwelling at least 270 days each year.	Yes.	Only one Permanent Resident may be associated with a Residential Unit on the Registry	Requires Business Registration Number and Business account Number. Re-registration required every two years. Registration required with the ASTR. \$50	Yes-transient Occupancy Tax o 14%	Yes.	Yes. Owner must spend at least 275 night a year in the unit. If you own/rent a multi-unit building, you may only register the specific residential unit in which you reside. Registered hosts may only conduct un-hosted (where owner is not present) short-term rentals for up to 90 nights per calendar year.	Must be owner.	Hosting platforms must verify that any home offered for str is lawfully registered with ASTR (City) before the platform may provide or collect a fee for booking services for that unit. Must maintain records of renters. Must have registration number on hosting platform. Cannot
Seattle		Allows 2 licenses per person. One license can be their primary residence and the other can be their second home		Requires Business license tax certificate and STR license (\$75 per unit, valid one year.	No City tax, but state sales and lodging taxes apply.	No.	No.	No.	Operator must follow new operating standards, such as posting basic safety information and providing a local contact number for guests in the unit. The building must meet current building and safety codes

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	Limit the number of days per year a room can be rented	Limit the total number of STRs a person or company can own/manage	Limit the total number of STR dwellings, rooms, or guests	Require a License or Registration	Impose Tax or Levy	Restrict the Use through Zoning	Require principal occupant to live in the unit	Require principal occupant to live on the property	Other Info
Annapolis, Maryland		1 STR per person.		Yes. Inspection required. Issued on annual basis.	County taxes applies	STR may not create a use that is prohibited in the zoning district in which the dwelling is located	No.	No.	Requires the STR licensee either to live in the City of Annapolis or to have a property manager based in the City of Annapolis to oversee the property should any issues arise.
Louisville		Limits the density of STRs by imposing a 600 ft distance requirement. No STR can be within 600 ft of another STR.		Yes. \$100 fee renewed annually.	Local transient occupancy tax applies.		Does not distinguish between primary and secondary.	No.	Grandfathered all existing STRs before setting distance requirement.
San Antonio			In Residential Areas, STR limited to no more than one-eighth (12.5 per cent) of the total number of single-family, duplex, triplex, or quadraplex units on the block face.	Yes. \$100 permit fee valid for 3 years	Owner or Operator must remit all applicable state, county, and City Hotel Occupancy Taxes.	No. Permitted in all zones.	No.	No.	