1. HC Agenda - 12.14.2016

   Documents:

   HC AGENDA - 12.14.2016.PDF

2. HC Minutes - 12.01.2016

   Documents:

   HC MINUTES 12.01.2016.PDF

3. HC 2016 Annual Report

   Documents:

   HC 2016 ANNUAL REPORT - 12.14.2016.PDF

4. Short Term Rental Memo - 12.14.2016

   Documents:

   SHORT TERM RENTAL MEMO 12.14.2016.PDF

HOUSING COMMITTEE

DATE: **Wednesday, December 14, 2016**
TIME: **6:30 p.m. – 8:30 p.m.**
LOCATION: **City Hall, City Council Chambers**

A G E N D A

1. Review and accept Minutes of previous meeting held on December 1, 2016

2. Review 2016 Housing Committee Annual Report – See enclosed memorandum by Tyler Norod, Housing Planner

3. Discussion of Short Term Rentals and potential policy framework by Housing Committee Members – See enclosed memorandum by Tyler Norod, Housing Planner.

4. Housing Committee member discussion and next steps

Councilor Jill Duson, Chair

Next Meeting Date: TBD

Housing Committee

Minutes of December 1, 2016 Meeting

A meeting of the Portland City Council's Housing Committee (HC) was held on Thursday, December 1, 2016 at 7:00 P.M. in the City Council Chamber in Portland's City Hall. Councilors present at the meeting included Councilor Committee Chair Jill Duson, Vice Chair Councilor David Brenerman, and members, Councilor Belinda Ray, Councilor Spencer Thibodeau, and Councilor Nick Mavodones. Also present was Councilor-Elect Pious Ali. City staff present included City Manager Jon Jennings, Director of Planning & Urban Development, Jeff Levine; Division Director Mary Davis; and Housing Planner, Tyler Norod.

Item 1: Review and accept Minutes of previous meeting held on October 26, 2016.

Councilor Ray motioned and Councilor Thibodeau seconded to accept the minutes from the October 26th Housing Committee meeting. Minutes were unanimously approved 5-0.

Item 4: Committee Discussion of Short Term Rentals and potential policy framework

The item began with Tyler Norod providing a brief overview of the issue and refers to the staff memo which outlines the proposal. Mr. Norod notes that staff took into consideration public comments heard during previous meetings. Points out that staff recommendation includes a 300 unit cap on the number of STR units. Mentions that several city departments participated in these draft regulations. Mr. Norod reviews big bullet points. City Manager, Jon Jennings providing a brief overview of the issue and clarifying revisions made to the proposed STR regulatory framework. He indicates that the proposal is presented by staff as guidance for the committee.

Councilor Duson asks the committee if they have additional ideas that should be introduced at this time. Committee decides to start by discussing Attachment A to identify consensus or alternatives. Councilor Duson indicates that the committee will not take action today.

Councilor Thibodeau has a few concerns with #1. Definition of STR. He believes that STRs should be defined as units renting for 6 days or less instead of 30 days. This would help clarify rental types on the islands as they typically rent for a week or more at a time instead of exempt outright. Mr. Norod indicates staff intent regarding the 30 day term. Councilor Thibodeau is concerned about more traditional short term rentals (business rentals, etc which pre-date Air BnB).

Councilor Ray – definition of STR, thinks 30 days or less is a STR. Thinks the discussion of the cap may help to address this issue. She is reluctant to exempt islands and would like to regulate everything the same way but as district councilor for islands, will advocate for saving discussion on islands for another time.

Councilor Brenerman asks if any community that regulates STR that has a definition of fewer than 30 days. Tyler indicates he is not aware of that; seasonal vacation areas may require a minimum of "for at least 7 days". Councilor Brenerman thinks he would like to stick with the 30 days and deal with the islands separately.

Councilor Duson asks for discussion on Attachment A, #2.

Councilor Brenerman wonders if this is where the committee should talk about different fee structures; the more units you use as STRs the higher your fee. Proposes $35 for your own unit in a building and $250 for next unit and $500 for one after that, then up significantly after that ($1,000 if X or more, ….)

Councilor Duson has concerns. She thinks that there are two elements to consider. The revenue from fees to capitalizing the Housing Trust Fund and staff costs, as well as the impact on neighborhoods The fee structure without a cap would essentially say that if I have enough money I can buy myself out of neighborhood impact.

Councilor Mavodones thoughts are more in line with Councilor Brenerman but maybe not necessarily be in line with the fees he mentioned and is open to different ideas on what the fees should be.

Councilor Ray believes STRs are having impact on the long term housing market and can grow into a larger problem because it can be more financially attractive to property owners than long term tenants. Councilor Ray asks if larger fees apply to owner occupied, non-owner occupied or both.

Councilor Brenerman suggests an owner's unit should be minimal, like $35, then next unit higher, like $250, etc.

Councilor Thibodeau suggests $35 owner occupied 1st unit, $500 for 2nd unit, $1,000 for 3rd unit, $1,500 for 4th unit, and higher still until 6 or more units. He is not in favor of any caps at this time but would consider potential limits per building but this may be problematic amongst those sharing the space (mix of short term and long term tenants).

Councilor Duson thinks a four unit non-owner occupied short term rental has major impact on a neighborhood. Councilor Ray shares that concern. Would like to keep a low barrier to participation especially for smaller property owners, people doing it for a little additional income; not completely in favor of tiered fees.

Councilor Ray proposes owner occupied definitions to include active, licensed business in the building. Also want to change limits for owner occupied buildings from her previous suggested policy framework.

Councilor Thibodeau and Councilor Brenerman could be open to capping number of units per building. A tiered fee structure would replace percentage of allowable units in the current proposal.

Councilor Ray is concerned about many units in a neighborhood not occupied by long term tenants changes the fabric of a neighborhood. She is concerned that a tiered fee structure does not make it prohibitive for someone purchasing 2-4 unit building for STR purposes and changing fabric of the neighborhood. When a landlord lives in the building, the building tends to be managed better. Councilor Ray also believes that the housing stock will be affected in the future and is concerned about not regulating now and be faced with a tougher situation later.

Councilor Duson believes we should be regulating larger buildings or more business type uses.

Councilor Ray would like to see a chart of fees (tiered fee structure with no cap) and low barrier.

Councilor Duson will ask that next housing committee invite current committee to next meeting to close out the discussion on this issue. Committee will "deputize" Ray and Thibodeau to work with Tyler to come up with presentation of two options or one proposal if they can agree on a compromise.

Councilor Brenerman asks how the City will determine primary residence. Tyler refers to affidavits employed by other communities for similar uses and recommends having applicants provide documents to provide evidence of primary residency such as homestead exemptions, voter registrations, etc.

Councilor Ray asks if declaring more than one primary residence would result in fine. Tyler says yes. She aslo asks whether or not tenants would be allowed to create an STR. Tyler explains that for liability and enforcement reasons, the property owner would be required to register any STR but could have an agent manage the STR (the tenant for example).

Councilor Brenerman would prefer tiered fees as opposed to limits per building.

Councilor Thibodeau asks if the Committee would be open to limits on buildings of 10 or more units.

Councilor Mavodones would be open to discussing; but would prefer tiered fees as opposed limits on number of units.

Councilor Duson would be comfortable with higher percentage of units in larger buildings or stepped up tiered fee structure.

Councilor Duson moves on to item 4 in Attachment A and asks for the Committee's thoughts.

Councilor Mavodones prefers no cap.

Councilor Brenerman prefers no cap.

Councilor Ray open to a cap but would want it to be revisited after one year (it would expire and then have to be re-visited in order to be re-instituted). Wants entire policy to be revisited in a year.

Councilor Duson is in favor of cap but would like cap to be higher and would like to have a review period re-evaluate annually.

Councilor Thibodeau not in favor of a cap at this time.

Councilor Duson notes that the Committee appears to be OK with item 5. Councilor Mavodones and Councilor Thibodeau are luke warm with this item.

Councilor Duson also suggests that the Committee appears to be comfortable with item 6.

Councilor Thibodeau thinks that could be stricter.

Councilor Mavodones would like some type of public explanation (website perhaps) of what to do if you have a property in your neighborhood that is a problem. Registrants would get the information at time of registration.

Under Item 7 regarding the islands, Councilor Mavodones thinks we may want to separate this issue from larger discussion, however safety items and registration are important.

Councilor Brenerman agrees.

Councilor Duson would like to put island residents on notice that Council will be establishing short term rental registration process in a set time period that would allow for public meetings. She does not want to exempt islands necessarily but wants a low-bar to do these activities.

Councilor Mavodones notes that many of the property owners might not live in Portland so public notice would be important.

Councilor Ray ok with having this as a separate discussion.

Councilor Thibodeau would like it to be part of this larger discussion.

Regarding items 8 9, 10, 11, 12, 15, all Committee members appear to be in consensus that these be included in a final policy framework.

Regarding item 13, Councilor Duson would like to see an inspection prior to registration.

Councilor Mavodones thinks what is proposed is adequate.

The City Manager indicates there is some concern of work load of the Housing Safety Office.

Councilor Duson thinks that there should be a baseline of basic safety.

Councilor Brenerman asks if a unit has not been inspected by the City how would a host know that the unit is up to date on safety codes?

City Manager indicates that the City could include a checklist in the application packet that is distributed as part of registration.

Regarding item 14, Councilor Brenerman suggests that the City should be sensitive to giving notice of inspections to hosts.

Councilor Mavodones asks if a registration number is intended to be per host or per unit. Tyler says per unit and would need to think more about per bedroom. Councilor Ray confirms that registration numbers should be identified in both advertisements and physically in the unit.

Councilor Mavodones asks if people with complaints would be able to contact host or property owner.

The City Manager indicates the preference would be to have people to contact the police.

Councilor Brenerman would like to consider a limit on number of persons allowed in a rental.

Councilor Duson proposes Maine Human Rights Commission formula of square foot amount per person.

Councilor Ray would like item 16 to read two business days instead of 48 hours.

Councilor Mavodones thinks in cases where immediate contact is necessary, 48 hours seems appropriate. He would like hosts to provide an alternate contact in case they are not nearby so that city staff can reach out as soon as possible in case of problem or emergency. The Committee agreed to leave item 16 at 48 hours.

Item 3: Housing Committee member discussion and next steps

The next meeting will be on Wednesday, December 14 at 6:30 PM.

On a motion made and seconded the meeting was adjourned at 9:39 PM.

Respectfully,

Tyler Norod

Portland, Maine Yes. Life's good here.

Planning & Urban Development Department

TO: Councilor Duson, Chair
Members of the Housing Committee

FROM: Jeff Levine, Planning & Urban Development Director
Mary Davis, HCD Division Director
Tyler Norod, Housing Planner

DATED: December 1, 2016

RE: Committee Goals, Work Plan, and Accomplishments - 2016

I. HCDC Committee Goals

The City Council held a meeting on January 25, 2016 to develop key priorities and goals for the Council and its Committees. Listed below are the goals suggested by the Council for the Housing Committee over the next 1-5 years.

- Assess the housing problem; look regionally; develop agreement on specific market goals and which kinds of housing needs the most focus;
- Look at the current zoning regarding housing; do a complete review; do an expedited review of land use policies; look at zoning in our corridors;
- Plan for five new "Housing First" programs; and
- Identify City owned property in light of its housing potential.

II. Addressing Committee Goals

The Housing Committee led an inclusive and robust public process throughout 2016 to address housing issues in Portland. The Committee convened numerous meetings designed to solicit feedback from a variety of stakeholders and industry experts. These efforts led in part to a new Housing Insecurity Package passed by the Council and extensive background information that will set the table for future discussions in 2017. Outlined below is a brief overview of how the Committee addressed each of the goals highlighted by the City Council.

GOAL: Assess the housing problem

The Committee held a series of seventeen public meetings to hear from members of the public and real estate experts on issues impacting the local housing market. Attendees included a wide range of participants including local tenant advocacy groups, senior housing advocates, local landlords,

real estate attorneys, Portland Housing Authority, shelter staff, Maine State Housing Authority, local affordable housing developers, national housing experts, and neighborhood associations. The Committee convened a special regional housing forum inviting surrounding communities to discuss housing from each community's perspective and work towards identifying areas of overlapping interest. The Committee also held a special community forum at USM that was attended by more than 100 interested individuals. The special forum resulted in more than 135 policy ideas for the Committee to sift through, ultimately whittling the list down to approximately 17 ideas to examine in greater detail.

The Committee distributed the 17 policy ideas for analysis by themes, choosing to first examine housing insecurity issues. The Committee reviewed a variety of topics including rent control, minimum notifications for renewing leases and rent increases, tenant/landlord mediation programs, voucher discrimination, a Rental Housing Security Ordinance, the Leeway Program, and a Tenant Relocation Assistance program. After significant analysis and debate the Committee ultimately recommended a Housing Insecurity Package to the Council that included items to educate tenants on their rights, establish a Tenant/Landlord Commission, incorporation of Maine Human Rights Act prohibiting income discrimination, and an increase in minimum notification to 75 days for all rent increases. The package was ultimately adopted by the City Council on November 21, 2016.

GOAL: Zoning

Throughout its extensive public process, the Housing Committee heard from a variety of stakeholders that were interested in the City focusing its efforts on encouraging additional housing production along its transportation corridors and neighborhood nodes, particularly off-peninsula. Both Committee members and staff were supportive of this feedback. However, due to competing timelines related to the pending completion of Portland's Comprehensive Plan (Comp Plan), the Committee did not have an opportunity to consider specific zoning revisions during this year's session. The Comp Plan is anticipated to be completed and adopted by the Council this winter. It will likely contain a number of guiding principles that will help steer growth in Portland over the next decade including how Portland's zoning code will evolve. It is likely that the Comp Plan will recommend similar zoning strategies to encourage growth along our transportation routes and in our neighborhood centers. This issue is sure to continue into the work plan for future Housing Committees.

GOAL: Housing First

The Housing First model is part of a national trend to confront homelessness. The model is based on the concept that homeless individuals or households first need housing as part of their stabilization process. The City Council has set a goal of five new Housing First developments. The City already has two completed Housing First projects in Logan Place and Florence House. A third, Bishop Street, has been approved.

The City released HOME Funds earlier this year in part targeting the creation of new affordable housing units, including Housing First units. Unfortunately, the City did not receive any responses to its RFP for Housing First projects. Although the Committee received well deserving and much needed projects in response to the RFP, the Committee noted that future Committee's may want to

examine additional ways to help encourage more Housing First developments.

GOAL: City Owned Land

In April, the City Council made reforms to its policy regarding tax acquired properties. The reforms helped clarify the disposition process and included new language requiring the net sale proceeds from any sale to go into the Housing Trust Fund. Now that the Council has further outlined the parameters for acquiring and selling City owned land future Committees will be in a better position to plan for how best to utilize that land, possibly for housing.

III. ***2016 Activities with Status***

Housing Insecurity Package

On September 28, 2016, the Housing Committee voted to recommend a package of five (5) housing insecurity policy items to the Council for their consideration. The City Council later adopted these items into a new ordinance on November 21, 2016. The package includes the following items:

1. Increase notification for residential rent increases from 45 days to 75 days for all tenants-at-will and prior to the end of an existing lease.
2. Landlords and tenants must sign a document to be drafted by the City explaining tenancy-at-will.
3. Creation of a leaflet outlining tenant/landlord rights and responsibilities that must be distributed to all tenants.
4. Establish a tenant/landlord commission comprised of seven (7) members and co-chaired by one landlord and one tenant representative.
5. Incorporation of Maine Human Rights Act prohibition against income discrimination into City ordinance.

Housing Reference Binder

At the request of the Housing Committee, City staff compiled a Housing Reference Binder as an indexed resource for Committee members and the general public to search for more information on the wide range of housing related policy tools, funding sources, and programs currently employed by the City. The final document consists of more than 540 pages of information and is available on the City's website for easy public access. The Binder is intended to be a living document, subject to occasional additions, deletions, and amendments. New programs, new reports, or major changes in policy should be reflected, and outdated information should be deleted, or at least noted as such, as appropriate. It is the hope that this document will bring clarity and tangibility to the work of the Housing and Community Development Division.

Housing Program Budget

The Housing Committee reviewed and approved the Housing Program Budget for HUD's annual HOME allocation for Portland and Cumberland County. The budget divided the funds into four categories including administration, housing rehabilitation, Tenant Based Rental Assistance (TBRA), and affordable housing development.

HOME Development Funds

At the Housing Committee meeting on February 24th, 2016 the Committee approved application criteria for staff to identify and recommend eligible development projects that were interested in applying for federal HOME Funding. The application went out to the public on May 2nd and closed on June 30th. Three proposals were received by the City with two projects ultimately being awarded funds by the Committee and subsequently the City Council. The Committee allocated $191,000 towards St. Dominic's Apartments to perform significant repairs to the existing historic building to preserve 12 decent and safe low income housing units. The project also included a 25% set aside for individuals or families residing in a Portland shelter. The second project to be awarded HOME Funding was Portland Housing Authority's 58 Boyd Street project. 58 Boyd Street will include 55 units of new mixed-income housing. The project will receive $64,000 in 2016 HOME Funds as part of a larger $135,000 allocation made the previous year for a total investment of $200,000.

Short Term Rentals (Airbnb)

The Housing Committee initiated a review of the Short Term Rental (Airbnb) market and discussed a potential regulatory framework for recommendation to the Council. This is an extremely complex issue that many municipalities around the nation are struggling to regulate effectively. As of December 1, 2016, the Committee had held three meetings and facilitated a robust dialogue as it attempted to formulate the best path forward. At this time, the Committee has not determined its final recommendation but appears to be close to identifying parameters that could outline a policy for Council consideration.

Additional Items

Staff also provided the Committee with informational briefings on several important housing issues, such as:

- Reviews of recent land use amendments targeting additional housing development;
- Regulations and impediments to Tiny Houses in Portland;
- Examined a potential pilot program for encouraging the development of more housing;
- An overview of shelter zoning issues;
- An overview of corridor zoning; and
- An overview of the Oxford Street Shelter services.

IV. Future Work

The Committee made great strides this year to frame the most important issues while taking steps to help achieve the Councils goals as part of its five year plan for the Housing Committee. Significant public input was gathered from a variety of stakeholders and in a variety of forums in an effort to promote an inclusive and comprehensive process. That said there is still more work to be done. Listed below are a few items for the next Housing Committee to consider as part of their work plan for 2017.

- Corridor/Neighborhood Node Zoning;
- Shelter Zoning;
- Housing Update on Recent Revisions to the R-6 Zone;
- Housing First Incentives;
- Capitalizing Housing Trust Fund.;
- Accessory Dwelling Unit (ADU) Analysis; and
- Clarifications to Existing Ordinances.

Portland, Maine | Yes. Life's good here.

Planning & Urban Development Department

TO: Councilor Duson, Chair
Members of the Housing Committee

FROM: Jeff Levine, Planning & Urban Development Director
Mary Davis, HCD Division Director
Tyler Norod, Housing Planner

DATED: December 14, 2016

RE: Short Term Rental (Airbnb) Regulation Framework

The Housing Committee last met to discuss potential short term rental (STR) regulations on December 1, 2016. At that meeting Committee members provided feedback on draft regulatory framework and requested at the following meeting to have a memo outlining the two policy frameworks suggested by Councilor Ray and Councilor Thibodeau. Since that time, staff has worked with other departments including the City Manager's office, Permitting & Inspections, the Housing Safety Office, the Police Department, and Corporation Counsel to incorporate feedback from Committee members into a regulatory framework for review.

Areas of Agreement

At the previous Housing Committee meeting, Committee members expressed agreement on a number of regulatory themes governing STRs. Areas of agreement are outlined in Attachment A of this memo.

Items for Further Discussion

Despite general consensus on a large portion of the regulatory framework relating to registration, enforcement, and safety, the Committee needs more time to consider what policy measures may be appropriate for balancing the STR market with the long term housing market in Portland. To this end, Councilor Ray and Councilor Thibodeau proposed two differing strategies for regulating STR market forces. It is anticipated that the Committee will discuss these proposals with an eye towards making final recommendations to the City Council. Listed below are charts outlining the two strategies:

Councilor Thibodeau's Proposal

Councilor Thibodeau provided two scenarios that would require hosts to register their units annually with the City at escalating costs for each additional unit. For example, a host with three units listing would be required to register annually with the City's Housing Safety Office for a total of $1,535. In this example the same registration fee would be due whether or not all the STR units registered were in the same building or spread out across multiple buildings.

Both scenarios outlined below are based on a similar premise of using registration costs to limit the unmitigated proliferation of STRs within the local housing market. Because STR units profitability

are based on a number of variables including location, condition, size, price per night, debt, occupancy rates it is difficult to provide accurate analysis at this time as to whether or not this strategy will realize its intended effect on the market. As discussed at previous meetings, whatever policy direction is taken the City may want to consider reexamining this issue again in the future to better understand the STR market.

If Councilor Thibodeau's proposal is supported, the City would need to add language to the regulations requiring that non-individual property owners, such as LLC's, provide the names of individuals with a financial stake in the LLC so that a proper record could be kept to accurately assess registration fees per host. The Committee should also clarify whether or not the initial $35 registration fee for a first STR unit is for primary residences or open to all STR hosts including non-owner occupied units.

Scenario 1

1st Unit	$35
2nd Unit	$500
3rd Unit	$1,000
4th Unit	$1,500
5th Unit	$2,000
6th Unit and every unit thereafter	$3,000

Scenario 2

1st Unit	$35
2nd Unit	$500
3rd Unit	$1,000
4th Unit	$2,000
5th Unit	$4,000
6th Unit and every unit thereafter	$8,000

<u>Councilor Ray' Proposal</u>

Councilor Ray proposal would place limitations on the number of STRs that could exist in each building based on the building's size and owner occupancy. If passed, this policy framework would need to require hosts to provide certain documentation to prove a unit is their primary residence. Clarification would also be needed to establish annual registration fees.

Owner Occupied Buildings

Single Family Home (Owner Occupied: home is owner's primary dwelling)	• May offer rooms in home or—when owner is away—entire home as STR(s) provided the home is the owner's primary dwelling. • Acceptable proof of primary dwelling: owner registered to vote at that address; Owner's Driver's License shows address; signed affidavit to City stating home is primary dwelling; Homestead exemption in owner's name at that address; other proof deemed acceptable by staff.
Multi-Unit Building (Owner occupied: one unit in the building is owner's primary dwelling or is used by the owner for owner's active, licensed business)	• Units may be offered in a multi-unit, owner occupied building as follows: 2 unit building – 1 STR 3 unit building – 2 STR 4 unit building – 3 STR 5 unit building – 4 STR 6+ unit building – 5 STR • Owner may also offer rooms in primary unit or—when owner is away—entire primary unit as STR(s) • Acceptable proof of primary dwelling: owner registered to vote at that address; owner's Driver's License shows address; signed affidavit to City stating home is primary dwelling; Homestead exemption in owner's name at that address; proof of active, licensed business operated by owner in one unit of address; other proof deemed acceptable by staff.

Non-Owner Occupied Buildings

Single Family Home (not Owner Occupied)	• Entire home may not be used for STR (defined as rental of less than 30 days) • No rooms may be used for STR unless established as a lodging house.
Multi-Unit Building (not Owner Occupied)	• Units may be offered in a multi-unit, non-owner occupied building as follows: 2-4 unit building – 1 STR 5-9 unit building – 2 STR 10+ unit building, up to 20% of total units rounded down and capped at a maximum of 5 units (examples below) 10 unit building – 2 STR 15 unit building – 3 STR 20 unit building – 4 STR 25+ unit building – 5 STR

Attachment A: Revised Draft STR Regulatory Framework

The majority of Housing Committee members expressed a general level of comfort with the following regulatory framework. Larger issues related to annual registration costs and potential limitations placed on the number of STRs allowed per building need to be discussed further.

1. A Short Term Rental (STR) is a dwelling unit or rooming unit for transient guests for less than 30 days;
2. Property owners and their agents (Hosts) may not operate an STR without annually registering with the Housing Safety Office each unit or rooming unit;
3. The City will reevaluate the STR policy annually to understand the STR market impact on Portland's housing stock;
4. Due to accountability and effective enforcement concerns only property owners will be able to register STRs;
5. Should a property violate the Disorderly House Ordinance the STR registration will be revoked and the property not reconsidered for to register again for a minimum of 12 months;
6. STR regulations would not apply to the Islands but all rentals on the islands should still continue to register with the City's Housing Safety Office;
    a. The City may choose to look at the issue of island STRs at a separate time in the future;
7. For clarity, STR regulations will not supersede condominium bylaws and each condominium association may enforce its own STR restrictions as the association deems appropriate;
8. STR will be addressed similar to all other applicable building and land use violations as described under Section 6.1 of the City Code and the Disorderly House Ordinance;
9. All registration fees and penalties shall be contributed towards administrative costs, with a set percentage going into the Housing Trust Fund;
10. Property management firms found operating STR's without proper registration may be fined. These fines may be in addition to fines levied against the property owner;
11. Where applicable, hosts must sign an affidavit that the registered unit is their primary residence and provide copies of documents approved by the City demonstrating compliance with this residency requirement, including government ID's, Homestead Exemption, voter registration, and any other documents deemed appropriate by City staff;
12. Hosts must sign an affidavit drafted by the City that the STR unit is up to date on all safety codes including but not limited to having working smoke/CO detectors, proper egress, etc;

13. As a condition of registration, STR's must allow on-site inspections, as well as upon request present their registration information, rental history and upcoming reservations;

14. A registration identification number will be given to each host per listing;

15. Failure of hosts or their representatives to adequately respond to inquiries by the City within a 48 hour period shall be considered a violation of these regulations and be subject to penalties under Section 6.1.