



To: Members of the City Planning Commission of the City of New Orleans

From: Mavis Early & Stephen Perry on behalf of The Greater New Orleans Hotel & Lodging Association & the New Orleans Convention & Visitors Bureau

Date: June 6, 2016

Re: Position of the Greater New Orleans Hotel & Lodging Association (GNOHLA) and the New Orleans Convention & Visitors Bureau (NOCVB) regarding City Planning Commission recommended short-term rental (STR) licenses set forth in the recommendation dated January 19, 2016.

Honorable Commissioners,

On September 25, 2015, the Greater New Orleans Hotel & Lodging Association (GNOHLA) and the New Orleans Convention & Visitors Bureau submitted to you a letter providing our opinions about short-term rental proposed regulations and testified at meetings of the City Planning Commission (CPC), City Council Committee meetings, Council meetings and other public meetings. This letter was made part of the official record of public comment the Commission’s study records on this subject. We refer you to that letter, which is attached for your reference.

Below we have set forth our position on short-term rentals addressing proposals that were part of the study findings issued by the CPC in a brief format.

Position:

1. We **support** allowing short-term rentals for doubles occupied by owners with a homestead exemption, *but not in the French Quarter or Garden District. With limitations.*
2. Subsequent to the creation of an effective regulatory framework with a proven enforcement mechanism, we would **support** the legalization of “Temporary Short-Term Rentals,” *except in the French Quarter, Garden District, and Lower Garden District.* The Temporary STR, by its nature, will be more difficult for the City to permit and enforce because of the fluid nature of this type of rental. Temporary STR’s should be limited to no more than 4 times per year and no more than one week per rental totaling no more than 30 calendar days.

3. We **support** the City's existing prohibition on short-term rentals in the French Quarter and Garden District and urge short-term rentals in those areas remain prohibited.
4. We **oppose** any effort to allow whole house and condo units to serve as short-term rentals unless occupied by an owner with a homestead exemption.
5. We **oppose** the concept of homes in residential districts being used for the primary purpose of short-term rentals. We urge you to maintain your position to **not allow** the proposed Principal Residential/Type P STR License.
6. We **oppose** short-term rentals in commercial districts *with short-term rental rules and regulations that are different from hotel rules and regulations.*

Reasoning:

- **Safety of Guests –**
 - If the City regulates short-term rentals, it has an obligation to put in place safety standards that protect our visitors.
 - All STR's should comply with appropriate building, fire and safety codes with type of building and use considered.
- **Level Playing Field/Fair Competition –**
 - Commercial landlords using Airbnb and similar are running lucrative, commercial hotels; as such, they must be regulated the same as hotels.
 - Not to do so is unfair competition.
- **Loss of jobs –**
 - The hotel and lodging industry provides a huge and growing volume and variety of jobs and career opportunities.
 - Short-term rentals do not.
- **Zoning –**
 - Rational zoning laws are what make cities livable and viable.
 - After ten years of working on a master plan for the City and amending the zoning code to comply with it, why would our city leaders want to deem the master plan and zoning code meaningless and irrelevant?
- **Neighborhoods –**
 - Insufficient regulation of short-term rentals and non-compliance with rational zoning laws will destroy:
 - the quality of life of its residents, and
 - the authenticity and uniqueness of New Orleans neighborhoods, which will ultimately reduce tourism and all of its benefits to the City.

- **Affordable Housing –**
 - The proliferation and exponential growth of short-term rentals in residential areas are eliminating affordable places for our residents to live and impacting their ability to find housing close to their workplaces.

- **Enforcement –**
 - Government regulates and easily collects taxes from hotels because it requires data reported that promotes enforcement.
 - Unless online short-term rental companies like Airbnb are required to share ownership and location of short-term rental data with the City, there is no meaningful enforcement possible. Airbnb has been unwilling to provide to other cities this type of data necessary for enforcement.

- **Value to the state and city –**
 - There will be more economic growth, tax revenues for the state and city, and jobs created from continued robust hotel operation and development than from short-term rentals.

Thank you for your service and commitment to our unique City. Let us keep it that way.