



Dec 4, 2018

Las Vegas City Council  
Las Vegas City Hall  
495 S. Main Street  
Las Vegas, NV 89101

Dear Members of the Las Vegas City Council:

We write to acknowledge the work of the City Council in trying to regulate the short-term rental market in a unique and diverse community like Las Vegas. The 2016 law, although well-intentioned, encompassed numerous layers, fees, and onerous registration process, which unfortunately resulted in low compliance. We believe the current proposal will have the same ramifications. Bill 2018-58 limits short-term rentals (STRs) to Owner-Occupied only, will likely result in similar low compliance, and will require a significant increase in enforcement needs that cannot be supported by city funding. Our experience in working with other localities has been that onerous restrictions may drive underground normally law-abiding residents who host to make ends meet.

We ask that you **reject** this ordinance, and work with platforms and your constituents who share their homes, to craft a comprehensive ordinance that addresses concerns about neighborhood impacts while striking an appropriate balance in bolstering the City's reputation as one that welcomes technology. Many of the cities with which we have partnered around the world have been successful in creating enforceable regulations because they adhered to several best practices. Identifying the best regulations for the City will require detailed discussion, additional time, and shared collaboration. We appreciate the opportunity to comment and share some of the following recommendations:

- **Simplify the rules, license requirements, and registration process.** In our experience, a complicated registration system which requires hosts to obtain a variety of city permits such as conditional use, special exception or special use, leads to low compliance with licensing requirements and undermines the public's confidence that short-term rentals are being properly regulated. In order to maximize the number of hosts who comply with the license registration, the City should consider creating a licensing system which allows all hosts to submit an application online and creates a straightforward registration process with clear requirements of application and approval.
- **Create a tiered system that includes reasonable limits.** A tiered system that allows for all residents - including those who rent their whole home or second home - to obtain permits with fair and reasonable limits, has been successful in many cities. We recommend the City consider allowing primary residence hosts to do so "by right" with a small fee, and creating a similar process for hosts who share non-owner occupied whole home rentals. This whole-home rental registration process should not be costly for the City to administer, but should include a higher fee with appropriate density limits based on areas of concern. This will allow Las Vegas to welcome visitors in a sustainable way while still balancing the needs of neighborhoods.
- **Involve stakeholders in creating a compromise ordinance with reasonable requirements.** As Airbnb grows, we recognize the opportunity and responsibility to work with local governments to craft progressive and fair rules for home sharing. We've worked with many jurisdictions around



the world to develop unique, fair and enforceable rules that not only protect neighborhood character and quality, but also allow residents to continue sharing their homes to earn important supplemental income, while providing an opportunity for guests to continue visiting this great city for big events - further contributing to the City's local economy. Airbnb would like to work with the City to reach this compromise.

Working in partnership with platforms is key to successful implementation of short-term rental regulations. In addition to the suggested changes we've proposed, there are a variety of tools Airbnb can provide to help bolster these changes and help the City with host compliance, including:

- **Host Notification and Education:** We can help ensure our host community is aware of the ordinance changes and steps they need to take to comply with the law. This includes email notification when the law is enacted to reinforce registration requirements. In addition to notifying our host community, we can activate our Las Vegas Host Community to provide registration workshops for new and current hosts, and create a dedicated responsible hosting FAQ page outlining the specifics of the ordinance in partnership with the City staff. This will help ensure hosts are in the know with changes and requirements.
- **Customer Service Support & Neighborhood Tool:** Airbnb's review system discourages against unruly guests, and our [Neighbors Tool](#) provides anyone with the ability to submit a complaint or contact our customer service staff if nuisance issues arise. Airbnb is happy to engage in discussion on how shared information and a reporting system can support the City's efforts with bad actors.
- **Administrative Information Support:** Airbnb will continue to respond to the subpoena and warrant requests submitted through the administrative process from the City Enforcement Department so the City can enforce its ordinance. This includes the provision of a direct email alias that allows for a shorter processing time. Airbnb will also work to provide Las Vegas with quarterly reports about the scope and size of our community, including the report provided, so the City Council and Business License department can better understand what is being regulated.

Short-term rentals have become an economic lifeline for seniors, young professionals and military families, and have been found to be an important part of contributing to local economies. Hundreds of local families depend on Airbnb to pay their bills, and the vast majority of our hosts are sharing the homes in which they live to make ends meet. We have observed in other cities that bans and partial restrictions result in exacerbated problems, and simply do not work. However, limits and strong enforcement, coupled with a robust partnership with platforms, do work. Please **reject** this version of Bill 2018-58, and instead allow the opportunity for open dialogue with stakeholders so we can begin to correct past challenges and determine the new solutions. By partnering, we are confident we can identify the right solutions together.

Thank you for your time, consideration and leadership.

All the best,

Laura Spanjian  
Policy Director  
Airbnb





# Overview of the Airbnb Community in Las Vegas Administrative Boundaries

Jan 1 - March 31 2018



## Airbnb in Las Vegas

Airbnb hosts in Las Vegas share unique experiences with travelers from around the world while also making additional income to help make ends meet. This report shows Airbnb's impact on hosts and the city's business community for the Jan 1, 2018 to March 31, 2018. It combines Airbnb data for listings specifically in Las Vegas administrative boundaries. Airbnb helps visitors explore the paths less traveled, while providing hosts with additional income to make ends meet.

**1375**

Active hosts in area

**17,685**

Total bookings

**3.11 days**

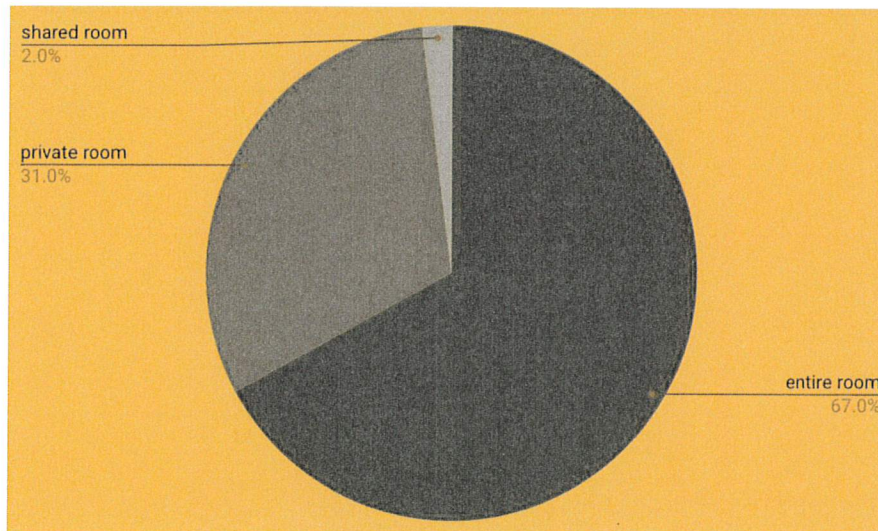
Typical length of stay for  
typical listing - past 12 months

**\$31.48 million**

Total Host Earnings for past  
12 months

**2,723**

Active Listings





## All Definitions

---

**Annual Earnings (Typical Host):** Median value of total income earned by host during the one-year study period. Annual earnings are presented for typical hosts.

**Average Length of Stay:** The average length of stay per guest, rather than per trip.

**Host:** Airbnb community members who rent space on Airbnb.

**Listing (Active):** A property listed on Airbnb. Listings may include entire homes or apartments, private rooms or shared spaces. Active Listings are all listings that appear on the website during a search. Active listings do not necessarily have availability on a particular date or at all.

**Listing Types:** Airbnb classifies listings as three different types: Entire Home / Apartment listings, Private Room Listings, and Shared Room Listings: **Entire Home / Apartment Listing** - A listing where the guest can rent the entire home from the host. The host is not present in the home during the guest's stay. **Private Room Listing** - A listing where the guest can rent a private bedroom within a home. The host may be present in other parts of the home during the guest's stay, and the guest may share common spaces like the kitchen, living room, and/or a bathroom with the host. **Shared Room Listing** - A listing where the guest can rent a communal space, such as a shared bedroom or a living room sofa bed, within a home. The host may be present in the home during the guest's stay, and the guest may share common spaces like the kitchen and/or a bathroom with the host.

**Nights Hosted (By Listing):** Total number of nights a given listing is rented through Airbnb in the study period. Only listings that were active as of the start of the study period, and had at least one booking during the study period are included, in order to present the most representative annual values for Airbnb hosting activity.

**Nights Hosted (Typical Host):** Median value of total nights hosted per host during the one-year study period. Nights Hosted are presented for typical hosts.

**Typical Host:** The median host for all hosts who had at least one active listing as of the start of the study period and at least one booking during the study period. Typical host definitions are used to calculate Annual Earnings and Nights Hosted. Presenting the median value for all hosts who were active as of the start of the study period provides the most representative values for the Airbnb host community.