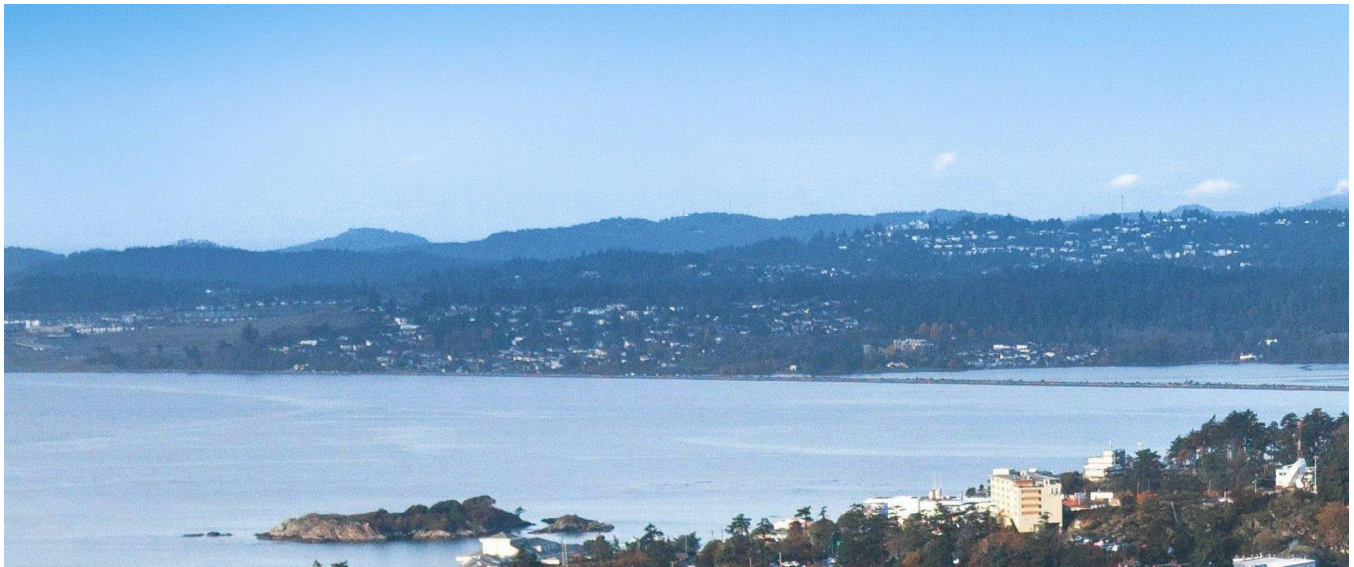


SHORT-TERM RENTAL REGULATORY OUTLINE

TOWNSHIP OF ESQUIMALT

JUNE 2026



PREPARED FOR
The Township of Esquimalt
June 2026

PREPARED BY
Eric Swanson, Principal
Third Space Planning

Short-Term Rental Regulatory Outline

TOWNSHIP OF ESQUIMALT · JUNE 2026

On March 16, 2026, Esquimalt Council received *Short-Term Rental Policy Analysis*, a report prepared by Third Space Planning. The report analyzed regulatory options for short-term rentals (STRs) in the Township of Esquimalt and provided a framework for considering the associated policy trade-offs.

The report was structured to support a two-phase decision-making process: first, Council's selection of the Township's basic regulatory approach; and second, a series of detailed decisions required to fully establish the regulatory framework.

Basic Approach

At its March 16, 2026 meeting, Council passed the following motion to establish the Township's basic regulatory approach:

“That Council authorize that short-term rentals be permitted only within the operator's principal dwelling unit; renting a room while present, or the whole home while away; with no secondary or garden suites included; and limited to a maximum of 180 nights per year.”

Detailed Decisions

The *Short-Term Rental Policy Analysis* report included a section (pp. 37-45) outlining a series of detailed decisions required to fully establish Esquimalt's short-term rental regulatory framework, following Council's selection of a basic approach.

That report should be treated as supplemental background to the present report, which:

- Identifies a number of *additional* detailed decisions;
- Provides a recommendation for each decision;
- Includes additional discussion for those recommendations anticipated to require more explanation.

For brevity, alternative approaches are not provided for every detailed decision. Where Council wishes to explore alternatives on any specific topic or aspect of the regulations, these can be provided as needed.

SUMMARY RECOMMENDATIONS

The following table summarizes the recommended approach to specific aspects of Esquimalt’s short-term rental regulations, organized by bylaw or policy area. Each item is numbered to support cross-referencing with the Discussion section that follows.

Specific bylaw amendments, including precise definitions and regulatory language, will be drafted following confirmation or revision of the approaches outlined below.

Table 1 – Summary Recommendations

Item	Topic	Recommendation
ZONING BYLAW		
1.1	<p>Current “Bed and Breakfast” use</p> <p><i>Additional background and rationale is provided in the Discussion section.</i></p>	<p>Unify B&B and STR uses under a single term and set of regulations.</p> <ul style="list-style-type: none"> • Eliminate the existing B&B term and associated regulations and references across the Zoning, Parking, and Bylaw Notice Enforcement bylaws. • Allow the new STR use to include serving or providing up to one meal per day to overnight guests. • Amend or rezone the RS-4 and RS-4A zones to align with a standard single-family residential zone (with new STR permissions). This would provide the affected property owners with broader permissions than they have under the current zoning.
1.2	<p>Current “Tourist Accommodation” use</p> <p><i>Additional background and rationale is provided in the Discussion section.</i></p>	<p>Keep the “Tourist Accommodation” term to allow for amenity-rich, dedicated guest accommodation units in mixed-use developments.</p> <ul style="list-style-type: none"> • Amend the definition to distinguish clearly between “Tourist Accommodation,” meaning dedicated guest accommodation units, and “Short-Term Rental,” meaning STR use that is secondary or accessory to residential use of a dwelling unit. • While the provincial principal residence requirement remains in force, any “Tourist Accommodation” use that is not a standard hotel, motel, or similar form of accommodation will need to comply with this requirement or meet the provincial test for “Exempt Accommodation.” For example, it may need to be managed under a Strata Hotel or Fractional Ownership-type model.
1.3	<p>Defining “Short-Term Rentals”</p> <p><i>Additional background and rationale is provided in the Discussion section.</i></p>	<p>Define short-term rentals as temporary guest accommodation taking place in residential dwelling units, with stays of less than 90 consecutive days.</p> <ul style="list-style-type: none"> • This aligns with the provincial definition and therefore avoids a source of potential confusion; however, it leaves open a regulatory

Item	Topic	Recommendation
		grey area beyond 90 days (1.4).
1.4	Monitor “Medium-Term Rentals” <i>Additional background and rationale is provided in the Discussion section.</i>	Monitor the prevalence of 90+ day listings following the implementation of the regulations. <ul style="list-style-type: none"> • Under the recommended definition (see 1.3), the Township would generally treat rentals of 90 or more consecutive days on platforms such as Airbnb as “residential” use, even though that may not reflect the substance of the arrangement in all cases. For example, no residential tenancy agreement may be in place. • Available options for addressing this grey area would add complexity to the regulations. At this stage, ongoing monitoring is recommended before introducing any such complexity.
1.5	Defining “Principal Dwelling Unit”	Define a principal dwelling unit <i>broadly</i> as the usual dwelling unit where one makes their home, as indicated on government ID and tax filings. <ul style="list-style-type: none"> • The specific, enforceable supplement to this broad definition is the 180-night limit on whole-unit rentals (see 1.7). • Where more than one dwelling unit on a parcel is simultaneously used by a single family/household for residential purposes (e.g., a main floor and a legal secondary suite), only one of these dwelling units can be classified as the principal dwelling unit. • Guidance can be issued to help residents and staff interpret/identify separate dwelling units, in order to maintain the housing-protective intent of the regulations.
1.6	Cooking facilities	Formally define “Cooking Facilities” in the Zoning bylaw, and add a new definition of “Kitchenette” or “Limited Food Preparation Facility.” <ul style="list-style-type: none"> • This will help prevent the “quasi-kitchen” loophole that can otherwise undermine/frustrate principal dwelling-unit style short-term rental regulations. • These definitions can also be used to add clarity to the existing “Hotel”, “Motel”, and “Tourist Accommodation” uses.
1.7	Number of allowable nights per year	Limit whole-unit rentals to 180 nights per calendar year, with no limit on private-room rentals. <ul style="list-style-type: none"> • Based on staff’s interpretation of Council’s March 16, 2026 motion and related discussion, the 180-night limit would apply only to whole-unit rentals. Private-room rentals would not be subject to an annual night limit.

Item	Topic	Recommendation
		<ul style="list-style-type: none"> This can be readily tracked and enforced using provincial data. The Township could consider using 180 <i>days</i> rather than 180 nights, to align with the Province’s 90-day definition of short-term rental. There is no significant practical difference between the two approaches.
1.8	Illegal suites	<p>Prohibit short-term rental use on any lot containing an illegal or unpermitted suite.</p> <ul style="list-style-type: none"> The site inspection required as part of initial business licensing would identify any such instances before a licence is issued.
1.9	Per-lot limits	<p>Limit short-term rental use to one dwelling unit per lot.</p> <ul style="list-style-type: none"> This would help prevent circumvention of the regulations through “principal residence stacking,” where multiple household members attempt to claim separate principal dwelling units on the same lot in order to multiply STR eligibility.
1.10	<p>Secondary suites and garden suites</p> <p><i>Additional background and rationale is provided in the Discussion section.</i></p>	<p>Prohibit short-term rentals in secondary suites and garden suites.</p> <ul style="list-style-type: none"> Consistent with Council’s March 16, 2026 motion, prohibit short-term rentals in secondary suite and garden suite (detached accessory dwelling unit) typologies. The initial business licence inspection would verify the nature of the associated dwelling unit or units.
1.11	Zones	<p>Add “short-term rental” as a permitted use in all zones where dwelling units are permitted.</p> <ul style="list-style-type: none"> The use itself would be restricted to principal dwelling units, as described above.
PARKING BYLAW		
2.1	<p>Parking requirements</p> <p><i>Additional background and rationale is provided in the Discussion section.</i></p>	<p>Require no additional parking beyond what is already required for residential use.</p> <ul style="list-style-type: none"> Parking requirements would remain as specified for residential uses in Table 1 of the Parking Bylaw. If experience shows that STR use is creating consistent and significant additional parking demand in specific areas, the issue could be reviewed and addressed at a later date.
BUSINESS LICENSE BYLAW		

Item	Topic	Recommendation
3.1	Pre-license inspection	<p>Require a pre-licence site inspection by building, fire, and planning and/or bylaw staff before any new STR business licence is issued.</p> <ul style="list-style-type: none"> • An inspection would be required for new STR business licence applications, and would be carried out consistent with normal procedures. • Further inspections, e.g. upon annual renewal or after receiving a complaint, would be at the discretion of staff and in accordance with normal procedures.
3.2	Proof of residency	<p>Require a declaration of residency and supporting documentation.</p> <ul style="list-style-type: none"> • At initial application and each annual renewal. • Use the same list of valid supporting documents set out in section 5.1 of the provincial <i>Short-Term Rental Accommodations Regulation</i>.
3.3	Number of business licenses per household	<p>Permit only one STR business licence per household.</p> <ul style="list-style-type: none"> • Include an applicant declaration confirming that no other member of the applicant’s household holds, or has applied for, an STR business licence. • This would help prevent circumvention of the regulations through multiple principal dwelling unit claims by members of the same household.
3.4	Designated responsible person	<p>Require a designated responsible person for each STR business licence.</p> <ul style="list-style-type: none"> • Require each licence holder to identify a designated responsible person who is available to respond to issues when the operator is unavailable or away. • Specify that the designated responsible person must be able to respond within a defined timeframe.
3.5	Guest safety attestation	<p>Require a guest safety checklist and attestation.</p> <ul style="list-style-type: none"> • Require licence holders to complete and sign a guest safety checklist identifying key fire and building safety measures, including a requirement to create and post a fire evacuation plan or diagram. • The attestation would be renewed at each annual licence renewal.

Item	Topic	Recommendation
3.6	Strata, owner and landlord permissions	<p>Require written consent from the property owner, landlord, and/or strata corporation, as applicable.</p> <ul style="list-style-type: none"> • This would be submitted upon initial licensing and during every renewal.
3.7	Display of business license	<p>Require the prominent display of business license numbers in all advertisements and listings.</p> <ul style="list-style-type: none"> • This is also required by the Province.
3.8	Fees	<p>Charge a high initial license fee, with a lower annual renewal fee.</p> <ul style="list-style-type: none"> • Set the initial licence fee to recover the cost of application review, pre-licence inspections, administration, and initial compliance/enforcement activity. An initial fee in the range of \$1,000 to \$2,000 may be appropriate. • Set the annual renewal fee at a lower amount, with adjustments over time as the Township gains experience with the ongoing cost of administering and enforcing the program. • Existing licensed B&B operators could be charged the lower renewal fee when obtaining their first STR licence, in recognition of their existing B&B licence.

BYLAW NOTICE ENFORCEMENT BYLAW

4.1	Penalties	<p>Establish a dedicated STR contravention and penalty schedule.</p> <ul style="list-style-type: none"> • Include specific contraventions for each of the major requirements in the Zoning and Business License bylaws. • Set penalty amounts at the high end of the Township's current range, such as \$500 per infraction, per day, to support effective deterrence and help offset the cost of proactive enforcement. • Review penalty amounts over time and increase them if needed to support compliance and recover the cost of enforcement.
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INTERNAL POLICY AND PRACTICE

5.1	Enforcement posture	<p>Take and maintain a proactive approach to enforcement.</p> <ul style="list-style-type: none"> • Use proactive enforcement methods, rather than relying primarily on complaints, including ongoing scans of active listings, flagging and delisting non-compliant units through the provincial portal, and issuing local tickets for non-compliance. • Make a relatively significant enforcement investment at the outset to establish a high baseline level of compliance.
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Item	Topic	Recommendation
5.2	Enforcement guide	<p>Create an internal enforcement guide to support consistent interpretation and enforcement.</p> <ul style="list-style-type: none"> • The guide should address key interpretation issues, such as how to determine whether a space constitutes a separate dwelling unit and the presence or absence of “Cooking Facilities”.
5.3	Enforcement priorities	<p>Focus enforcement on unlicensed listings and priority bylaw contraventions.</p> <ul style="list-style-type: none"> • Prioritize the identification of active STR listings that do not display a valid local business licence number. The provincial portal/platform allows for rapid flagging and removal of these listings. • Maintain an internal list of priority bylaw contraventions, aligned with the core intent of the regulations. In most cases, the provincial portal/platform will allow for rapid flagging and removal, in addition to the issuance of municipal tickets. More complex cases can be forwarded to the provincial Compliance and Enforcement Unit for consideration.
5.4	Enforcement capacity	<p>Make STRs part of one staff person’s core focus.</p> <ul style="list-style-type: none"> • Ideally, this would involve approximately one FTE for the first six to twelve months following adoption, tapering to a part-time workload once a high baseline level of compliance has been achieved.
5.5	Guide to the regulations	<p>Create a public guide to the new STR regulations.</p> <ul style="list-style-type: none"> • Develop a short web-based and/or downloadable guide to support public understanding of the new STR regulations and related application requirements.

DISCUSSION

This section includes a discussion of selected recommendations from Table 1 that are anticipated to require more explanation, specifically:

- **1.1 – Current “Bed and Breakfast” Use**
- **1.2 – Current “Tourist Accommodation” Use**
- **1.3 and 1.4 – Defining Short-Term Rentals, and Monitoring Medium-Term Rentals**
- **1.10 – Secondary Suites and Garden Suites**
- **2.1 – Parking Requirements**

Detailed rationale can be provided for other recommendations as needed/upon request.

1.1 – Current “Bed and Breakfast” Use

RECOMMENDATION

Unify B&B and STR uses under a single term and set of regulations.

- Eliminate the existing B&B term and associated regulations and references across the Zoning, Parking, and Bylaw Notice Enforcement bylaws.
- Allow the new STR use to include serving or providing up to one meal per day to overnight guests.
- Amend or rezone the RS-4 and RS-4A zones to align with a standard single-family residential zone (with new STR permissions). This would provide the affected property owners with broader permissions than they have under the current zoning.

CONSIDERATIONS

- B&B use is currently limited to two custom zones, covering six parcels, with only two licensed operators.¹
- B&B use grants no additional permissions beyond the contemplated STR use, except that it explicitly permits serving or providing up to one meal per day to overnight guests.
- Apart from the one-meal-per-day permission, B&B use is considerably more restrictive than the contemplated STR use. Existing B&B regulations include building, lot, and parcel restrictions, as well as limits of three bedrooms, six guests, and stays not exceeding two weeks.
- As a result, following implementation of the contemplated STR regulations, there would be little reason to seek a B&B licence rather than an STR licence, unless the one-meal-per-day permission was important to the business or there were meaningful differences in administrative requirements or licence fees.
- With this in mind, it is not clear what purpose the zoning restrictions in the RS-4 and RS-4A zones would continue to serve, particularly in relation to regulating the one-meal-per-day permission, which would be the only remaining distinct permission provided by B&B use.
- Because the serving or providing of one meal per day to overnight guests has not been identified as a priority issue for Council, the recommended approach seeks to simplify the consolidated Zoning Bylaw by extending this explicit permission to all STR operators. This

¹By virtue of the fact that the B&B zones do not allow secondary suites, and because B&Bs must be operated out of “Single Family Dwelling” “Permanent Residences”, B&Bs are effectively restricted to principal dwelling units while the operator is normally present/residing. I.e., B&B use is not a work-around to the contemplated 180-night limit on whole-unit rentals.

explicit permission is also helpful because it provides clearer access to the relevant exemption for STR operators under the provincial *Food Premises Regulation*. If Council does view this as a priority area for local regulation, the recommended approach could be adjusted accordingly, including by maintaining a distinct B&B use in some form.

- This recommendation would require additional amendments to Esquimalt’s bylaws. However, any impact on the timing of the new STR regulations could be avoided by phasing the amendments: first, amendments to permit the new STR use; and second, subsequent housekeeping amendments to remove or update references to B&Bs.

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> • Cleaner, more straightforward bylaw – Eliminating the B&B use and associated regulations would reduce potential confusion between B&B and STR use and create a simpler consolidated bylaw. • Expanded permissions for licensed operators – The two existing licensed B&B operators would receive expanded permissions under the new STR framework, including removal of the current two-week limit on guest stays. 	<ul style="list-style-type: none"> • More amendments required – The B&B term and associated regulations would need to be removed, primarily from the Zoning Bylaw. The RS-4 and RS-4A zones would require significant amendments or rezoning to a standard residential zone. • Potential competition with food service establishments – Allowing all STR operators to serve or provide up to one meal per day may reduce guest demand for local cafés and restaurants. However, it is unclear how many STR operators would provide a meal, or how significant the impact would be.

1.2 – Current “Tourist Accommodation” Use

RECOMMENDATION

Keep the “Tourist Accommodation” term to allow for amenity-rich, dedicated guest accommodation units in mixed-use developments.

- Amend the definition to distinguish clearly between “Tourist Accommodation,” meaning dedicated guest accommodation units, and “Short-Term Rental,” meaning STR use that is secondary or accessory to residential use of a dwelling unit.
- While the provincial principal residence requirement remains in force, any “Tourist Accommodation” use that is not a standard hotel, motel, or similar form of accommodation will need to meet the provincial test for “Exempt Accommodation.” For example, it may need to be managed under a Strata Hotel or Fractional Ownership-type model.

CONSIDERATIONS

- The “Tourist Accommodation” term is currently applied on a spot-zoning basis, including in Zones CD-84 and CD-102, to permit mixed-use developments and operations involving both residential and commercial accommodation.
- The specific mix of residential and tourist accommodation uses is customized by zone. For example, in CD-102, just under half of the units may be used for dedicated tourist accommodation, while the remaining units must be used as long-term residences.
- A core feature of the “Tourist Accommodation” use is that it allows amenity-rich units, including units with full kitchens, to be used as dedicated non-residential tourist accommodation.
- By contrast, under the current Zoning Bylaw, “Hotel” units are not permitted to include kitchens or private cooking facilities.
- Similarly, neither the contemplated STR use nor the existing Bed and Breakfast use permits dedicated non-residential whole dwelling units with kitchens or cooking facilities to be rented as guest accommodation.
- The existing “Tourist Accommodation” definition allows amenity-rich, kitchen-containing units to be used for dedicated commercial tourist accommodation by allowing “Dwelling Units” to be used as “Tourist Accommodation.” However, this creates a degree of incoherence in the Zoning Bylaw, because “Dwelling Units” are defined as residences. In other words, a unit cannot simultaneously function as both a residence and a dedicated commercial accommodation unit.

- Including “Dwelling Units” in the “Tourist Accommodation” use also creates some overlap with the current “Bed and Breakfast” use.
- The recommended approach would address this incoherence by amending the existing “Tourist Accommodation” definition to refer to a new term, such as “Tourist Accommodation Unit.” This new term could be defined to explicitly permit full kitchens, as well as multiple rooms and/or sanitary facilities within each unit.
- The major caveat is that, so long as the provincial principal residence requirement remains in force in Esquimalt, any guest accommodation locally permitted under the “Tourist Accommodation” use must either:
 - » Comply with the provincial principal residence requirement (e.g., be another unit on the same lot as the host’s principal residence); or
 - » Be exempt from the provincial principal residence requirement because it is: (a) a traditional-format hotel/motel; or (b) meets the test for an “Exempt Accommodation Provider” (for example, a Strata Hotel or Fractional Ownership property).²

ADVANTAGES

- **Reduces confusion** – Clarifying the “Tourist Accommodation” definition would eliminate a potential source of confusion in the current Zoning Bylaw and better distinguish dedicated tourist accommodation from STR use.

DISADVANTAGES

- **More amendments required** – This approach would require additional bylaw amendments and may extend the implementation timeline.

²Please [click here](#) for provincial policy guidance on the Fractional Ownership exemption; please [click here](#) for guidance on the Strata Hotel exemption.

1.3 and 1.4 – Defining Short-Term Rentals, and Monitoring Medium-Term Rentals

RECOMMENDATIONS

Define short-term rentals as temporary guest accommodation taking place in residential dwelling units, with stays of less than 90 consecutive days.

- This aligns with the provincial definition and therefore avoids a source of potential confusion; however, it leaves open a regulatory grey area beyond 90 days (see below).

Monitor the prevalence of 90+ day listings following the implementation of the regulations.

- Under the recommended definition (see 1.3), the Township would generally treat rentals of 90 or more consecutive days on platforms such as Airbnb as “residential” use, even though that may not reflect the substance of the arrangement in all cases. For example, no residential tenancy agreement may be in place.
- Available options for addressing this grey area would add complexity to the regulations. At this stage, ongoing monitoring is recommended before introducing any such complexity.

CONSIDERATIONS

- Please refer to pp. 38–39 and Table 8 of the *Short-Term Rental Policy Analysis* report, which outline three options for defining short-term rentals, along with their respective advantages and disadvantages. These options include a 90-day definition, a 30-day definition, and a duration-neutral definition.
- The 30-day definition is not recommended due to the disadvantages identified in the aforementioned Table 8.
- The duration-neutral definition is more directly anchored in the key land use question: is the unit being used as someone’s residence, or is it being commercially supplied as guest accommodation? From a land use perspective, the primary issue is not the number of nights, but whether potential housing stock is being diverted into transient accommodation use.
- However, defining short-term rentals differently from the Province – e.g. by taking a duration-neutral approach – would add a meaningful degree of friction to the Township’s regulatory and enforcement framework. The Township may wish to avoid this friction during the initial modernization of its regulations. For this reason, a 90-day definition of short-term rental is recommended.

- Under a 90-day definition, the Township would generally treat rentals of 90 or more consecutive days as residential use for the purpose of granting land use permission, even though that may not reflect the substance of the arrangement in all cases. For example, no residential tenancy agreement may be in place.
- If ongoing monitoring reveals a significant number of these units being listed, and/or if Council wishes to address this grey area, two major options are worth future consideration:
 - » Transitioning to a duration-neutral definition of short-term rentals (and perhaps a different land use term to reflect this); or
 - » Creating a separate “medium-term rental” category, such as 90 to 180 days, to bring a greater share of non-residential guest accommodation uses under regulation and into licensing.

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> • Simplifies joint enforcement and data sharing with the province – Aligning with the provincial definition would simplify joint enforcement, data sharing, and use of provincial compliance tools. • Clearer for operators – Using the same threshold locally and provincially would be easier for operators to understand than having distinct local and provincial definitions. 	<ul style="list-style-type: none"> • Leaves a regulatory grey area – Rentals of more than 90 consecutive days that do not meet the provincial test for residential tenancy would fall outside the local STR framework, even where they may function more like guest accommodation than long-term housing.

1.10 – Secondary Suites and Garden Suites

RECOMMENDATION

Prohibit short-term rentals in secondary suites and garden suites.

- Consistent with Council’s March 16, 2026 motion, prohibit short-term rentals in secondary suite and garden suite (detached accessory dwelling unit) typologies.
- The initial business licence inspection would verify the nature of the associated dwelling unit or units.

CONSIDERATIONS

- Council’s March 16, 2026 motion includes direction to exclude secondary suites and garden suites from short-term rental permissions.
- This direction is interpreted as applying to secondary suite and garden suite *typologies*. Under this interpretation, even if one of these units were claimed as the operator’s principal dwelling unit, it could not be used as an STR.
- An alternative approach would be to permit STR use in secondary suites or garden suites where the unit is the operator’s principal dwelling unit. The advantages and disadvantages of that approach would generally be the inverse of those listed below.

ADVANTAGES

- **Simpler interpretation and enforcement** – This approach would partially close off the “musical chairs” strategy of regulatory avoidance, where an operator claims to live in a secondary or garden suite to obtain STR permission, while actually living in the main dwelling unit on the lot.
- **More straightforward protection of secondary suites and garden suites as long-term residences** – These units are often relatively affordable and, in some cases, offer more amenities than comparable primary-rental-market units.

DISADVANTAGES

- **Limits opportunities for renters in secondary suites and garden suites** – Long-term renters living in secondary suites or garden suites would be prohibited from using STRs to earn supplemental income, even with landlord permission and even where no long-term housing would be lost.
- **Limits opportunities for some owner-occupiers** – Owners who verifiably live in a secondary suite or garden suite on their own lot would also be prohibited from using that unit for STR income, even where no long-term housing would be lost.

2.1 – Parking Requirements

RECOMMENDATION

Require no additional parking beyond what is already required for residential use.

- Parking requirements would remain as specified for residential uses in Table 1 of the Parking Bylaw.
- If experience shows that STR use is creating consistent and significant additional parking demand in specific areas, the issue could be reviewed and addressed at a later date.

CONSIDERATIONS

- Please refer to pp. 42–43 and Table 9 of the *Short-Term Rental Policy Analysis* report, which describe four options for STR parking requirements.
- The above recommendation is made primarily because it is not clear that accessory STR use will consistently generate greater parking demand than an average resident household, and because off-street parking availability is closely tied to building typology and location.
- Requiring dedicated off-street parking beyond what is already required for residential use would function as an indirect prohibition on STRs in some housing forms, including multi-family condos and apartments, townhouses, duplexes, and other small-scale multi-unit housing. This would be particularly true where no off-street parking space is associated with the dwelling unit, or where the operator’s vehicle occupies the associated space during guest stays.
- If experience shows that STR use is creating consistent and significant additional parking demand in specific areas, the issue could be reviewed and addressed at a later date.

ADVANTAGES

- **Avoids indirect prohibitions** – This approach avoids creating indirect prohibitions where none were intended and where STR parking demand is not expected to meaningfully or consistently exceed residential parking demand.
- **Simple and consistent** – This approach avoids complex custom parking requirements based on housing typology, zone, or host circumstances, which would

DISADVANTAGES

- **May affect parking supply** – This approach may increase perceived or actual pressure on parking supply, particularly in areas where parking is already limited.

ADVANTAGES

DISADVANTAGES

be difficult to explain, administer, and enforce.