



AGENDA OF THE EQUAL RIGHTS COMMISSION

MONDAY, OCTOBER 27, 2025, 5:30 PM
City Hall, Room 604 - The Harry Maier Room.
Virtual attendance is also available via Zoom.
AMENDED

A. Zoom Meeting Information.

I. Join Zoom Meeting Online:

<https://us06web.zoom.us/j/87139363656?pwd=MHRlUjVyb3dmd2x6eHhsN0x3Ry9yZz09>

Or call in by phone: +1 312 626 6799

Meeting ID: 871 3936 3656

Passcode: 182212

If you wish to speak at this public meeting or leave a comment, please fill out the online [Comment Form](#) prior to the meeting. More detailed [Zoom Instructions](#) can be found online.

B. Roll Call.

- I. Members: Tara Yang, Michael Vinson, Marcus Grignon, Jon Shelton, Stephanie Guzman, Joey Prestley, Natalie Hoffman

C. Approval of the Agenda.

- I. Approval of the agenda for the Monday, October 27, 2025, meeting of the Equal Rights Commission.

D. Approval of Minutes.

- I. Approval of the minutes from the Thursday, September 11, 2025, meeting.

E. Regular Business.

- I. For consideration, with possible action, on recommending changes to the Council regarding the Short Term Rental Ordinance [44-1580\(j\)](#).

F. Informational.

- I. Next Meeting: Thursday, November 13, 2025

G. Adjournment.

- I. Adjournment of the Monday, October 27, 2025, meeting of the Equal Rights Commission.

- 1) THIS MEETING IS RECORDED: THE VIDEO OF THIS MEETING AND MINUTES ARE AVAILABLE ONLINE AT www.greenbaywi.gov
- 2) ACCESSIBILITY: Any person wishing to attend who requires special accommodation because of a disability, should contact the City Safety Manager at 920-448-3125 at least 48 hours before the scheduled meeting time so that arrangements can be made.
- 3) QUORUM: Please take notice that a majority or quorum of the Common Council will attend this Equal Right Commission meeting and will constitute a meeting of the Common Council for purposes of discussion and information gathering relative to this agenda.
- 4) REPRESENTATION: The party requesting the communication, or their representative, should be present at this meeting.



Report to the
Equal Rights Commission
of the City of Green Bay

MEETING DATE

October 27, 2025

PREPARED BY

AGENDA ITEM # D.I

Approval of the minutes from the Thursday, September 11, 2025, meeting.

BACKGROUND

RECOMMENDATION

FISCAL IMPACT

ATTACHMENTS

- I. ERC_Minutes_9-11-25



MINUTES OF EQUAL RIGHTS COMMISSION

THURSDAY, SEPTEMBER 11, 2025, 5:30 PM

City Hall, Room 604 - The Harry Maier Room.

Virtual attendance is also available via Zoom.

A. ZOOM MEETING INFORMATION.

- I. Join Zoom Meeting Online:

<https://us06web.zoom.us/j/87139363656?pwd=MHRlUUVyb3dmd2x6eHhsN0x3Ry9yZz09>

Or call in by phone: +1 312 626 6799

Meeting ID: 871 3936 3656

Passcode: 182212

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B. ROLL CALL.

- I. Members: Chair Tara Yang, Michael Vinson, Marcus Grignon, Jon Shelton, Vice Chair Stephanie Guzman, Alder Joey Prestley, Natalie Hoffman

Present: Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffiman, Workplace Culture Specialist, Andrea Fox, and others.

Excused: Michael Vinson, Marcus Grignon, Jon Shelton

C. APPROVAL OF THE AGENDA.

- I. Approval of the agenda for the Thursday, September 11, 2025, meeting of the Equal Rights Commission.

Moved by Board Member Natalie Hoffman, seconded by Alder Joey Prestley to approve.
Motion Passed.
Yes - Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffiman, No-None, Abstain-None.

D. APPROVAL OF MINUTES.

1. Approval of the minutes from the June 5, 2025, meeting.

Moved by Alder Joey Prestley, seconded by Board Member Natalie Hoffman, to approve.
Motion Passed.
Yes—Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffiman, No-None, Abstain-None.

E. REGULAR BUSINESS.

1. For consideration with possible action on the creation of a mediation process for written complaints alleging a discriminatory practice or violation of the Chapter 12 - Civil Rights Ordinance.

Moved by Stephanie Guzman, seconded by Board Member Natalie Hoffman, to refer to staff, Assistant City Attorney, Logan Wood.
Motion Passed.
Yes-Tara Yang, Stephanie Guzman, Alder Joey Prestley, Natalie Hoffiman, No-None, Abstain-None.

2. For consideration with possible action on adding a protected class under the Chapter 12 - Civil Rights ordinance.

Moved by Alder Joey Prestley, seconded by Board Member Natalie Hoffman, to hold until the next Equal Rights Commission Meeting on October 9th, 2025.
Motion Passed.
Yes—Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffiman, No-None, Abstain-None.

3. For consideration with possible action on holding an annual consultation with Human Resources regarding Civil Rights training for employees.

Moved by Board Member Natalie Hoffman, seconded by Ald. Joey Prestley to refer to staff, Human Resources Director Brian Rollefson.
Motion Passed.
Yes—Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffman, No-None, Abstain-None.

F. INFORMATIONAL.

1. Next Meeting: October 9, 2025.

2. Chair update.

G. ADJOURNMENT.

1. Adjournment of the Thursday, September 11, 2025, meeting of the Equal Rights Commission.

Moved by Board Member Natalie Hoffman, seconded by Alder Joey Prestley, to adjourn.
Motion Passed.

Yes—Tara Yang, Stephanie Guzman, Joey Prestley, Natalie Hoffiman, No-None, Abstain-None.



Report to the
Equal Rights Commission
of the City of Green Bay

MEETING DATE

October 27, 2025

PREPARED BY

Alder Joey Prestley

AGENDA ITEM # E.1

For consideration, with possible action, on recommending changes to the Council regarding the Short Term Rental Ordinance [44-1580\(j\)](#).

BACKGROUND

Short-term rentals (STRs) in Green Bay have grown in number from roughly 120 in 2022 to over 430 today, after peaking at 500+ during the NFL Draft. Over the past year, the ERC heard testimony from individuals, neighborhood associations, and STR owners for a variety of perspectives on the issue. We consulted with staff to develop an advisory report suggesting regulations for short-term rentals.

RECOMMENDATION

The ERC recommends the following changes to the Common Council:

1. Adopt explicit nuisance-mitigation standards in [44-1580\(j\)](#). These can include explicit quiet hours, occupancy limits, parking requirements, and expectations for local contact.
2. Create a clear "three-strikes" enforcement policy with three documented violations within 12 months triggering permit revocation or non-renewal.
3. Increase fees from \$500 initial/\$250 renewal to \$1000 initial/\$500 renewal.
4. Impose a 180 consecutive-day cap on STR use.
5. Impose a 7-day minimum stay with an owner-occupied exemption.
6. Streamline and modernize compliance.

FISCAL IMPACT

If an increased renewal fee were adopted, renewal revenue for all 430 current STRs would rise by \$107,500.

ATTACHMENTS

- I. ERC Advisory Report on Short Term Rental Regulation in Green Bay



GREEN BAY EQUAL RIGHTS COMMISSION

Advisory Report on
Short-Term Rental
Regulation in Green Bay

EQUAL RIGHTS COMMISSION

The following members are appointed by Mayor Eric Genrich and confirmed by the Common Council:

Chair Tara Yang

Vice Chair Stephanie Guzman

Jon Shelton

Michael Vinson

Marcus Grignon

Natalie Hoffman

Aldersperson Joey Prestley

More information about the Equal Rights Commission can be found online at the City of Green Bay website: <https://greenbaywi.gov/1234/Equal-Rights-Commission>

Advisory Report on Short-Term Rental Regulation in Green Bay

Introduction and Executive Summary

The Green Bay Equal Rights Commission (ERC) submits this advisory report to the Common Council with recommendations for improving the regulation of short-term rentals (STRs) in our community. In the past few years, Green Bay has experienced a sharp increase in STR properties, growing from roughly 120 in 2022 to over 500 during the NFL Draft cycle and back to around 430 to date.¹ Alongside the economic opportunities STRs provide to property owners and visitors, this rapid growth comes with concerns about neighborhood impacts as well as housing availability and equity. Residents in some areas have reported rising nuisances and a loss of community character. For example, in the East Shore Drive Neighborhood, an estimated 5-10% of homes are now STRs, prompting fears of neighborhood degradation.² At the same time, responsible STR owners emphasize their positive contributions, like maintaining properties, paying taxes, and providing lodging for tourists. Owners seek fair, predictable rules that do not punish good actors for the problems caused by negligent property owners.

2020's Equal Rights Ordinance tasks the Equal Rights Commission with recommending to the Common Council suggestions to promote equal rights in the City of Green Bay:

The Commission shall meet not less than four (4) times annually for monitoring the employment, contracting, and program activities of the City, and prepare and provide timely reports to the mayor and council on efforts to promote equal rights, equal opportunities, positive community relations, and to eliminate discrimination and inequities in City government and the City.³

The Commission has carefully considered the STR conversation through an equity lens. We have regarded diverse perspectives, as well as the City's housing equity goals, and researched regulatory approaches in other Wisconsin communities. This report summarizes the relevant legislation and local context and offers a series of recommendations to balance the interests at stake.

¹ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024). A presentation by Mike Boutott (City STR Compliance Inspector), noted approximately 410 registered STRs in 2024 (up from ~120 in 2022). See also City of Green Bay Community & Economic Development Department, "*Short-Term Rental Permits – As of 3/18/2025*," internal report listing 485 active permits; updated numbers for September 2025 provided by city staff.

² City of Green Bay Community & Economic Development Department, "*Short Term Rental Permits – As of 3/18/2025*." Recent records indicate at least 11 STRs in the East Shore Drive Neighborhood, about seven percent of the roughly 150 homes that comprise that neighborhood.

³ Green Bay, Wis., Ordinance No. 25-20 (October 20, 2020), creating Green Bay Municipal Code Chapter 50 (Equal Rights).

In brief, the ERC recommends that Green Bay strengthen its STR ordinance to better mitigate nuisances, ensure STRs are operating as accountable businesses, and protect housing opportunities for residents, while also streamlining compliance and supporting hosts.

Recommendations include:

- a. Enforcing nuisance controls (e.g. parking, noise, occupancy limits) with a clear three-strikes enforcement policy for repeat violators.
- b. Treating STR operations more like other lodging businesses through appropriate permit fees, a robust licensing system, and enforcement of local contact requirements.
- c. Providing user-friendly compliance tools, such as an online registration portal and dedicated staff support, to assist responsible owners.
- d. Considering measures such as an annual cap on rental days to prevent full-time tourist rentals from removing too much housing stock from the long-term market.

Our recommendations come from current Wisconsin law, local data, public testimony, input from STR owners, and case studies of effective policies in other municipalities.

Background: Wisconsin Law and Green Bay’s Current STR Policy

Regulation of short-term rentals in Wisconsin is shaped by Wis. Stat. § 66.1014, which limits the extent of local control.⁴ A “short-term rental” is defined as a residential dwelling that is offered for rent for a fee and for fewer than 30 consecutive days. Under Wisconsin law, municipalities cannot prohibit STRs outright. However, the statute grants cities certain regulatory powers:

Permit Requirement: Cities may require that STR operators obtain a local license or permits. Green Bay has exercised this option; its ordinance mandates that any dwelling rented for fewer than 28 days consecutively must secure a short-term rental permit from the city in addition to the state-required tourist rooming house license and county health inspection.⁵

Minimum Rental Duration: A city may prohibit rentals of fewer than 7 consecutive days. Rentals of 7 to 29 days cannot be banned altogether by municipalities.⁶

Annual Cap on Rental Days: Municipalities may limit the total number of days per year that a dwelling can be rented short-term, if the limit is no lower than 180 days. This effectively allows a 180-day annual cap on STR use of a property, a tool some communities use to prevent year-round transient rentals.⁷

⁴ Wis. Stat. § 66.1014(2)

⁵ Green Bay Municipal Code § 44-1580(j)

⁶ Wis. Stat. § 66.1014(2)

⁷ Wis. Stat. § 66.1014(2)

Other Regulations: The law permits regulations not inconsistent with 66.1014.⁸ This has been interpreted to allow various health, safety, and nuisance-related rules (inspection requirements, parking and occupancy rules, etc.) as long as they don't amount to a *de facto* prohibition.

Notably, Wisconsin law does not allow cities to limit the number of short-term rental licenses issued or to bar STRs in certain areas through zoning⁹. In fact, §66.1014 was enacted to preempt such local bans; it deliberately omitted STRs from zoning authority and withheld two local powers: the power to outright ban STRs and the power to restrict rental duration beyond the 7-day minimum/180-day maximum provisions.¹⁰ All other aspects (licensing, inspections, nuisance regulations) remain under local control.

Green Bay's current ordinance (Green Bay Municipal Code §44-1580(j)) was adopted to apply some regulations to STRs while adhering to state restrictions and allowances.¹¹ Short-term rentals are legal in every zoning district in Green Bay, including Residential Districts, provided the owner obtains a City STR Permit and complies with city requirements. Key features of our existing program include:

Permit and Inspection: Hosts must secure a City STR Permit, valid July 1 – June 30 annually.¹² They must also pass an annual Brown County health inspection, which enforces state lodging safety standards.¹³ A state tourist rooming house license is also required via the Brown County health department.¹⁴

No Minimum Stay Requirement: Green Bay does not currently mandate a minimum rental period in its ordinance.¹⁵

Local Agent and Contact Info: Every STR must designate a local representative (someone available on short notice within 30 minutes' distance) to address issues. Owners must post a City-issued placard visible from the street as proof of permit and as a point of contact for neighbors. No other on-site advertising is allowed.¹⁶

⁸ Wis. Stat. § 66.1014(2)

⁹ Wisconsin Statutes § 66.1014(2)

¹⁰ Remzy D. Bitar, "Short-Term Rentals," *The Municipality* (League of Wisconsin Municipalities), April 2020, 22–23, <https://www.lwm-info.org/DocumentCenter/View/3990/Licensing-and-Regulations-403-Short-Term-Rentals> (accessed August 13, 2025)

¹¹ City of Green Bay, General Ordinance No. 12-23 (Dec. 5, 2023), codified at Green Bay Municipal Code § 44-1580(j)

¹² City of Green Bay, "Short Term Rentals," GreenBayWI.gov, accessed September 17, 2025,

<https://www.greenbaywi.gov/1486/Short-Term-Rentals>

¹³ City of Green Bay, "Short Term Rentals"

¹⁴ Brown County Health & Human Services Department, Public Health Division, Brown County Public Health Lodging Guidance (Green Bay, WI: Brown County HHS, n.d.), PDF, accessed September 17, 2025, <https://www.browncountywi.gov/i/f/files/HHS-Public-Health/Brown%20Co%20Public%20Health%20Lodging%20Guidance.pdf>

¹⁵ City of Green Bay, General Ordinance No. 12-23

¹⁶ City of Green Bay, General Ordinance No. 12-23

Safety and Zoning Provisions: STR use is confined to habitable areas; for example, basements may not be used as sleeping quarters unless proper egress windows are present. Outdoor temporary lodging units, such as tents or RVs, on the property are prohibited.¹⁷

Accountability for Violations: The ordinance holds both owners and renters jointly responsible for complying with all city laws. Violations such as noise, disorderly conduct, failure to post the permit placard, etc. can result in fines and even revocation or non-renewal of the STR permit. In practice, the City’s Development Department (which administers STR permits) and the dedicated STR Compliance Inspector, Mike Boutott, enforce these rules. For example, if an owner fails to display the required permit placard, staff will issue a notice and re-inspect. Continued non-compliance leads to a reinspection fee and could jeopardize the permit. Similarly, failure to obtain a permit at all can result in citations. The City uses software and neighbor reports to identify unlicensed STRs and sends violation notices in an escalating process.¹⁸

Permit Fees: To operate an STR in Green Bay, owners currently face combined fees of about \$1,000 in the first year (a \$500 city permit fee plus a \$492 county health license fee).¹⁹ Annual renewals total \$600 (\$250 City renewal + \$350 County).²⁰ These fees have not risen since their implementation in 2022. According to staff, other Wisconsin municipalities charge anywhere from as low as \$250 to as high as \$1,000 for similar permits, so Green Bay’s fee levels are in the mid-range of the spectrum.²¹ City legal staff say that state law does not specify caps on permit fees, but they must be reasonable and not so excessive as to constitute a *de facto* prohibition.²²

Two major state-law limitations constrain any additional regulatory steps the City might contemplate:

1. The City cannot cap the number of STRs citywide, nor restrict STRs to certain zones or distances. Saturation limits or spacing requirements (e.g. “no more than X STRs per block” or “not in low-density residential areas”) are off the table under current Wisconsin law.²³ As confirmed by the City Attorney’s Office, Green Bay has “no control” to limit how many properties can be licensed; those kinds of restrictions are preempted by the state.²⁴

¹⁷ City of Green Bay, General Ordinance No. 12-23

¹⁸ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

¹⁹ City of Green Bay, “Short Term Rentals,” “USER FEES.”

²⁰ City of Green Bay, “Short Term Rentals,” “USER FEES.”

²¹ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

²² Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

²³ Wisconsin Statutes § 66.1014(2)

²⁴ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

2. The City cannot mandate anything that effectively bans STRs. Any local regulations must be crafted to mitigate problems without outright preventing STR operation. For example, while we can impose a minimum stay up to 7 nights, we could not choose a 30-night minimum; that would equate to banning true short-term rentals. Similarly, while we can enforce strict safety, parking, and nuisance standards, we must be prepared to show these are reasonable efforts to protect public welfare. The 2019 *Good Neighbors Alliance v. Town of Holland* lawsuit illustrates this balance. A group of STR owners challenged the Town’s ordinance as overreaching, but the court upheld local provisions that were grounded in legitimate health/safety concerns and did “follow §66.1014”.²⁵ Green Bay should likewise ensure any new rules are consistent with the letter and intent of state law.

Green Bay’s current STR framework establishes the basic permitting and safety requirements allowed by state law, but it does not yet employ some of the stricter regulatory options, like rental duration minimums or annual day caps, that the statute permits. As the next sections detail, the rapid growth and clustering of STRs in certain areas have revealed gaps in our approach, particularly around nuisance impacts and housing equity, that stronger local regulations could address.

Community Concerns and Neighborhood Impacts

Residents have voiced numerous concerns about the impact of short-term rentals on Green Bay’s neighborhoods. While many STRs operate quietly, and not every neighborhood experiences problems, there have been enough complaints to warrant reassessing our STR policy. These include:

Noise and Late-Night Disturbances: Neighbors frequently cite noise as a top issue; transient visitors on vacation or in town for a Packer game may not observe the quiet hours that residents expect. Party houses or large gatherings at STRs can lead to loud music, yelling, or other disturbances, especially on weekends. In Green Bay, police data reportedly show relatively few STR-related calls so far, indicating most hosts and guests are respectful, but even a handful of high-profile nuisance properties can undermine neighborhood peace.²⁶ This erodes quality of life and can create hostility between neighbors and STR operators. Green Bay does require that owners and renters obey all ordinances, meaning guests can be cited for noise, vandalism, disorderly conduct, etc., but typically the burden falls on neighbors to call police or the city to report issues. This can strain neighbor relations and, if not addressed, the tension can grow into broad neighborhood opposition to all STRs.

²⁵ Remzy D. Bitar, “Short-Term Rentals,” The Municipality (League of Wisconsin Municipalities), April 2020, 22–23, PDF, accessed September 17, 2025, <https://www.lwm-info.org/DocumentCenter/View/3990/Licensing-and-Regulations-403-Short-Term-Rentals>

²⁶ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

Parking Congestion and Traffic: STRs that host large groups can overwhelm street parking and driveways in residential areas. According to residents neighboring STR properties, it's not uncommon for 4–5 vehicles to accompany a rental party, especially near Lambeau Field on game weekends. Green Bay ordinance already prohibits renting out additional RVs or campers on site, and our general parking rules forbid blocking sidewalks or hydrants, but enforcement can be tricky unless a neighbor calls to report a violation. In some neighborhoods, residents have observed an uptick in curbside parking competition and traffic from STR visitors who may not be used to local parking norms like Green Bay's overnight parking rules.²⁷ Ensuring STRs provide adequate off-street parking for their guests is a common-sense requirement to alleviate this issue; for instance, the Town of Holland requires at least one off-street space for every four guests an STR can accommodate.²⁸ Input from Green Bay neighborhood associations suggests parking is a manageable issue if proactively addressed through owner education and clear rules.

Loss of Neighborhood Cohesion: Beyond specific nuisances, there is a more intangible but widespread concern about neighborhoods with heavy STR concentrations losing their sense of community. Residents on a block with multiple STR properties might no longer know their neighbors or feel invested in each other's well-being. Longtime neighbors who moved out were replaced not by new resident families but by a rotating cast of tourists. This is a particularly acute concern in areas like the Stadium Neighborhood. While STR owners often do maintain their properties nicely, the absence of an on-site owner or long-term tenant can mean less oversight of day-to-day issues like landscaping, snow shoveling, or garbage removal that come with owner-occupancy. Over time, a cluster of short-term rentals could diminish the neighborly interactions that make a residential community healthy.

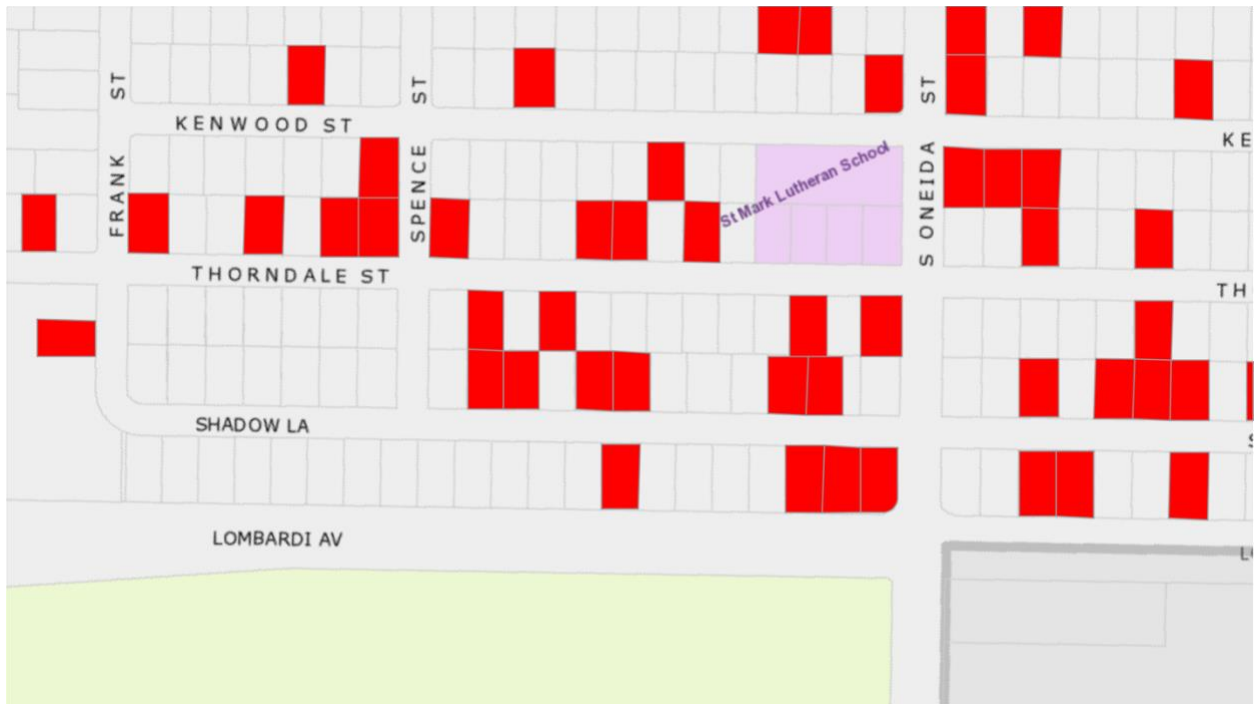
Safety and Security Concerns: Some residents worry about strangers coming and going frequently next door out of uncertainty; they don't recognize who is in the neighborhood and may feel less secure as a result. It's worth noting that properly managed STRs conduct guest screenings and inform neighbors of a local contact to call for problems, which can mitigate this concern. But where communication is lacking, neighbors might feel on edge. The ERC heard from residents who simply miss the stability of knowing the family in the house next door.

²⁷ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

²⁸ Town of Holland, Wisconsin, Code § 280-7(A)(2) ("Standards for short-term rentals"), Short-Term Rentals, eCode360, accessed September 17, 2025, <https://ecode360.com/36360965>



1. A map of Lakeside Place with documented STRs shown in red



2. A neighborhood in the Stadium District with documented STRs shown in red

It is important to underscore that not all STRs generate complaints; many operate with no issues, and some neighbors have reported positive experiences. We also note that the City's STR Compliance Inspector has been actively educating hosts and neighbors: Mr. Boutott regularly attends neighborhood association meetings and provides his contact info to residents, encouraging a collaborative approach to proactively address problems. This outreach is valuable, and the Commission believes more can be done to formalize and enforce good neighbor practices by STR owners.

The community concerns detailed here illustrate why refining STR regulations has become necessary. Unbridled growth in STRs, without adequate safeguards, can degrade the quality of life in residential areas and spark backlash. By strengthening our rules around nuisances and ensuring swift enforcement, Green Bay can protect neighborhoods while still allowing responsible short-term rentals to operate. The next sections consider the perspective of those STR operators and the broader housing equity implications, which must also inform a balanced policy response.

Perspectives and Needs of Short-Term Rental Owners

In crafting STR regulations, it is critical to consider the standpoint of property owners who operate short-term rentals, as their buy-in and compliance will determine the success of any policy. The ERC heard from several STR owners and hosts to better understand their experiences and concerns. A few key themes emerged:

Many STR Owners Are Local Residents with Small-Scale Operations: While roughly a fifth of registered STRs are owned by out-of-state investors, many of Green Bay's STRs are owned by local individuals or families. For example, one couple told the Commission that they purchased a single home near Lambeau Field as a short-term rental, fulfilling a "dream" to own property by the stadium. Since that couple lives in De Pere as their primary address, they use their Green Bay property as an STR mainly on game weekends.²⁹ Such owners typically have strong incentives to be good neighbors: they want to preserve the property's value and reputation. These hosts voiced worry that overly harsh regulations could drive them out of STR hosting, even though they follow all the rules. It was noted that the majority of permitted STR owners in Green Bay have only one property. 87% of owners have only a single STR registered with the city. 20% of STRs are owner-occupied.³⁰ In effect, most owners are local small-business owners or homeowners trying to earn supplemental income.

Emphasis on Fairness and Targeted Enforcement: Responsible STR hosts welcome reasonable regulations and may benefit from the City cracking down on irresponsible operators.

²⁹ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

³⁰ City of Green Bay Community & Economic Development Department, "Short Term Rental Permits – As of 3/18/2025."

In their view, the “bad apples” (unlicensed rentals, or those consistently causing nuisance) give all STRs a bad name. One owner explicitly urged the City to focus action on “people that are finding loopholes and abusing” the system, rather than penalizing those who comply and operate respectfully.³¹ This supports a regulatory approach that includes both strict enforcement against violators and outreach/education to help well-intentioned hosts stay in compliance.

Burden of Existing Requirements: Several hosts described the current permitting process and requirements in Green Bay. While generally manageable, there are pain points that could be improved. For instance, obtaining the initial health inspection and gathering all paperwork (insurance proof, etc.) can be complex for first-timers. The annual renewal cycle (by June 30) can sneak up on owners, especially if the City’s reminder communications are limited. Some owners felt the fee levels are high, though others acknowledged they are similar to other cities’ and simply a cost of doing business. There was interest in seeing more of the fee revenue reinvested into the STR program (through hiring additional staff or investing in better software) to help with compliance monitoring. This would make owners feel their fees directly support a level playing field. The presence of a dedicated STR inspector was seen as very positive; owners appreciate having a single knowledgeable point of contact at City Hall for their questions or issues.

Opposition to a 7-Day Minimum Stay Rule (with Caveats): One of the most discussed potential regulations is requiring a minimum rental length (such as Ashwaubenon’s 7-day minimum). Many Green Bay STR owners are concerned that a blanket 7-day minimum would severely hurt their ability to rent, especially for weekend tourism or Packer game trips which are typically 2–3 nights. They argue this could drive away visitors who only want a short stay and push them to hotels or to STRs in neighboring municipalities, like Allouez or Bellevue, without such rules. There was some openness to compromise solutions, such as exempting owner-occupied rentals or only applying a minimum stay during certain high-demand event periods. If Green Bay were to consider a 7-day minimum, owners urge that it be nuanced rather than one-size-fits-all, and only after weighing the economic impact. This report will later discuss how other locales like Ashwaubenon handled this issue. At minimum, STR owners want their input considered in such decisions.

Desire for Clarity and Communication: Another theme was the need for clear, readily available information on rules. Owners asked for better FAQs, checklists, or even training sessions from the City to ensure they understand their obligations (such as what the local contact agent must do, how to handle neighbor complaints, etc.). For example, some were initially unaware they needed a separate room-tax permit from the City’s Finance Department (to remit the 8% room tax), which led to inadvertent non-compliance.³² The City does have information on

³¹ Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

³² Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

its website and Mr. Boutott has been very responsive via email and phone, but newer hosts especially would benefit from a more streamlined onboarding process. STR owners generally indicated they want to follow the rules, so the simpler and clearer the City makes it, the higher compliance we can expect.

Responsible STR owners in Green Bay are not opponents of regulation. In fact, they share many of the same goals as their neighbors: safe, quiet neighborhoods and a fair marketplace. They ask that regulations be fair, consistent, and targeted at genuine problems. Heavy-handed measures that treat all STRs as a nuisance would, in their view, punish those who have been good actors and harm the local tourism economy. The challenge is to strike a balance where good operators face minimal burden beyond what's needed for health, safety, and community standards and bad operators face real consequences. The recommendations later in this report strive to achieve that balance, incorporating owner feedback such as better communication and support for compliance.

STR Overconcentration and Equity in Housing

One of the Equal Rights Commission's primary concerns, and a driving reason for our involvement in this issue, is the impact of short-term rental proliferation on housing equity and availability in Green Bay. The Commission's 2023 housing report, "Life, Liberty, and the Pursuit of Happiness: Recommendations to Promote Equal Housing Opportunity in Green Bay," examined a local housing affordability crisis, especially for vulnerable groups.³³ While STRs were not the main focus of that report, the core finding was that Green Bay needs more accessible, affordable housing for residents, achieved through strategies like zoning reforms, encouraging new housing development, and preventing discrimination in the housing market. The rapid growth of STRs poses a potential challenge to these goals in several ways:

Conversion of Long-Term Rentals to STRs: When a property owner opts to rent their house to short-term visitors rather than to a long-term tenant, that unit is effectively removed from the local housing supply for residents. In tight housing markets like Green Bay's, this can exacerbate shortages and drive up rents. A 2020 Green Bay housing market study revealed the need for all sorts of housing, including single family homes and duplexes, which are often the units rented out as STRs.³⁴ For example, a landlord with a single-family home might find it more lucrative to rent it on Airbnb by the night than to lease it to a local family for a year. If many landlords make this choice, the available stock of long-term rental homes declines. We have already seen signs of this in Green Bay. Several investors and LLCs have bought homes specifically to use as STRs,

³³ Green Bay Equal Rights Commission, *Life, Liberty, and the Pursuit of Happiness: Recommendations to Promote Equal Housing Opportunity in Green Bay* (Green Bay, WI: City of Green Bay, 2023), accessed August 15, 2025, <https://www.greenbaywi.gov/DocumentCenter/View/9861/ERC-Housing-Report-PDF?bidId=>

³⁴ City of Green Bay, Community & Economic Development Department, *Green Bay Housing Market Study* (Green Bay, WI: City of Green Bay, 2020), PDF, accessed September 17, 2025, <https://www.greenbaywi.gov/DocumentCenter/View/6110/Green-Bay-Housing-Market-Study-2020?bidId=>

and about a third of registered STRs are owned by a corporation rather than an individual.³⁵ Each such conversion means one less home for a Green Bay resident. The Commission is concerned that, if left unchecked, this trend could undermine the City’s efforts to expand affordable rental options. Our housing report stressed that increasing affordable housing stock is essential; losing existing units to the STR market moves in the opposite direction.

Impact on Home Purchase Opportunities: Similarly, some STR operators are purchasing houses that would otherwise be starter homes for families or first-time buyers, creating unfair competition in the single-family housing market. National studies have found that in popular tourism cities, the growth of STRs has put upward pressure on housing prices.³⁶ Green Bay is not yet a Madison or a Milwaukee in terms of housing cost, but in desirable neighborhoods or those near attractions, an STR buyer can often outbid local families because they are evaluating the property’s income potential, not just its personal value as a home. In fact, 48 STR owners in Green Bay hold at least two properties and 12 hold three or more. The largest single owner holds 7 properties.³⁷ When a significant portion of buyers are investors rather than owner-occupants, the risk is that prices detach from what local working households can afford. This dynamic threatens to further stratify the housing market and limit homeownership opportunities, especially for moderate-income and first-time buyers, who are often the young, minority, or otherwise marginalized groups the ERC is focused on empowering.

Location-Specific Burdens on Vulnerable Communities: It’s worth noting that STR proliferation doesn’t impact all areas equally. In Green Bay, much of the STR concentration is near entertainment and vacation locales (like Stadium Neighborhood, Downtown Core, and Bay Waterfront districts). Some of these areas are higher-income by nature, but others include working-class neighborhoods. If those neighborhoods experience rising housing costs or disruptions, the burden falls on the residents who might have fewer resources to relocate. Additionally, if landlords in lower-cost neighborhoods switch to STRs, they might be removing some of the only affordable rentals available to low-income residents. In our housing equity hearings, we heard how immigrants and large families struggle to find good housing due to limited supply and other barriers. An uncontrolled STR boom could tighten that supply further. So, there is an equity dimension: ensuring that STRs do not concentrate in a way that disproportionately disadvantages certain communities, either demographically or geographically.

³⁵ City of Green Bay Community & Economic Development Department, “*Short Term Rental Permits – As of 3/18/2025.*”;

³⁶ Kyle Barron, Edward Kung, and Davide Proserpio, “The Effect of Home-Sharing on House Prices and Rents,” *Marketing Science* 40, no. 1 (2021): 23–47, <https://doi.org/10.1287/mksc.2020.1227>; Keren M. Horn and Mark Merante, “Is Home Sharing Driving Up Rents? Evidence from Airbnb in Boston,” *Journal of Housing Economics* 38 (2017): 14–24, <https://doi.org/10.1016/j.jhe.2017.08.002>

³⁷ City of Green Bay Community & Economic Development Department, “*Short Term Rental Permits – As of 3/18/2025.*”; see also, Green Bay Equal Rights Commission, Regular Meeting, December 12, 2024, transcript (Green Bay, WI, December 12, 2024).

The ERC's stance is not that STRs are the root of the housing crisis. However, we do believe over-concentration of STRs can aggravate housing inequities if not managed. Our 2023 report called on the City to pursue policies ensuring all residents have access to a home.³⁸ In our view, part of a comprehensive housing strategy is to make sure residential properties primarily serve residential needs. STRs should complement, not cannibalize, the housing market.

Green Bay has tools to balance these interests. For instance, imposing the allowed 180-day annual rental cap can discourage full-time conversion of housing to tourist use, possibly nudging some owners to keep properties in partial long-term use. A 180-day cap still permits significant STR activity (a property could be rented half the year), but ensures it cannot be a dedicated year-round mini-hotel. Likewise, a 7-day minimum, if carefully targeted, could make speculative STR purchases less attractive in certain cases. Even simply enforcing strict licensing and prohibiting unpermitted STRs protects housing, because it disincentivizes the casual, possibly speculative, operators who might otherwise flood the market.

In short, the Commission urges the Common Council and Mayor to view STR regulations through the lens of housing equity. The recommendations that follow will include specific measures that help safeguard Green Bay's housing supply for those who live and work here, while still allowing STRs to operate in a responsible, community-friendly manner. The goal is a sustainable coexistence: STRs can provide economic benefit and lodging options, but not at the expense of Green Bay residents' ability to find an affordable, quality place to live, which the ERC firmly believes is a fundamental right and key to equal opportunity.

The Go Big Green Bay Comprehensive Plan echoes this approach: it notes that while platforms like Airbnb and VRBO expand options for visitors and traveling remote workers, STRs can reduce the long-term rental supply, drive up prices, and displace residents, impacts that are especially visible during Packers season. The plan recognizes the limits imposed by Wisconsin's 2017 statewide "Right to Rent" law, and still sets out a balanced path forward: (1) work with state legislators to restore greater local authority to regulate STRs; (2) cap STR permits in residential neighborhoods to preserve long-term housing; (3) set an annual limit on rentable days to prevent de-facto year-round STR hotels; (4) modernize the GB Services portal and establish a clear enforcement process; (5) collaborate with STR platforms so only registered, compliant listings appear; and (6) coordinate with property owners around Lambeau Field and along Lombardi Avenue so redevelopment leverages game-day demand in mixed-use areas without eroding neighborhood housing.³⁹ The ERC supports this direction: targeted caps and night limits in residential districts, stronger registration and enforcement, and channeling most visitor-

³⁸ Green Bay Equal Rights Commission, *Life, Liberty, and the Pursuit of Happiness: Recommendations to Promote Equal Housing Opportunity in Green Bay*

³⁹ City of Green Bay, Go Big Green Bay 2050 Comprehensive Plan (Draft), project website, accessed September 10, 2025, <https://www.gobiggreenbay.com/>

oriented activity to appropriate mixed-use corridors will allow STRs to add value without undermining Green Bay’s housing stability.

Case Studies: Lessons from Town of Holland and Ashwaubenon

Green Bay is not alone in grappling with STR regulation. Many Wisconsin municipalities have adopted ordinances in recent years to address the same state-law framework of §66.1014. The Commission examined two relevant case studies—the Town of Holland and the Village of Ashwaubenon—to inform our recommendations with local examples of what has worked.

Town of Holland (Sheboygan County)

This small town gained attention for its proactive and stringent STR ordinance, passed in 2018, which became the subject of the Good Neighbors Alliance lawsuit.⁴⁰ Key features of Holland’s approach include:

Annual Licensing with Strict Conditions: Holland requires a town-issued STR license for anyone renting more than 10 nights/year (a threshold similar to Green Bay’s). The license must be renewed annually, with board approval each year. The town can suspend or revoke a license after a hearing if an owner violates any ordinance requirements, has guests involved in illegal activity on the premises (2 or more occasions in 12 months), or owes any taxes/fees. This built-in enforcement mechanism ensures chronic violators can be removed from the STR market.

180-Day Cap and 7-Day Minimum: Holland’s initial ordinance limited the rental of any dwelling to no more than 180 days per year if the rental periods are between 7 and 29 days.⁴¹ This is the maximum restriction allowed by state law and prevents year-round short-term renting.

Local Agent and Guest Registry: Recognizing that many STR owners might live far away, Holland requires a local property manager/agent who resides or is based within 25 miles and is available 24/7 by phone.⁴² This contact’s name and phone must be on file, and the owner must update the town within 24 hours of any change. Additionally, every STR must maintain a register of all guests (names, addresses, dates, and payment amounts) for at least one year, available for town inspection.

Nuisance and Safety Provisions: Holland’s ordinance explicitly incorporates the town’s noise ordinance by referencing quiet hours between 10 PM and 7 AM and prohibits any outdoor event at an STR from lasting more than one day without special approval. Off-street parking

⁴⁰ Remzy D. Bitar, “Short-Term Rentals,” The Municipality (League of Wisconsin Municipalities), April 2020, 22–23, PDF, accessed September 17, 2025, <https://www.lwm-info.org/DocumentCenter/View/3990/Licensing-and-Regulations-403-Short-Term-Rentals>

⁴¹ Town of Holland (Sheboygan County, WI), *Ordinance No. 3-2018: Short-Term Rental Licensing Ordinance* (adopted March 12, 2018), accessed September 30, 2025, <https://www.townofhollandwi.gov/assets/files/2019/03/3-2018%20Short%20Term%20Rental%20posted.pdf>

⁴² Town of Holland (Sheboygan County, WI), *Ordinance No. 3-2018: Short-Term Rental Licensing Ordinance*

requirements were set (one space per every four occupants). STR owners must also provide a “Service Checklist” of emergency contacts to guests.⁴³

Penalties: Violations of the ordinance in Holland carry fines from \$50 up to \$500 per day per offense.⁴⁴

The Town of Holland faced legal challenges from a group of STR owners, the Good Neighbors Alliance, who argued that §66.1014 preempted some of these rules. Notably, they objected to requirements like the local manager residency and insurance mandates, claiming these put too great a burden on STR owners. In 2019, a circuit court upheld most of Holland’s ordinance, finding that the state law “preserved local power” through its carve-outs and that the town acted within its authority to protect public health, safety, and welfare.⁴⁵ The town did make a few concessions via amendments. For example, they removed an explicit minimum insurance coverage requirement and allowed STR owners to get a provisional license while waiting for their state license, to address practical concerns. Importantly, Holland removed its limitation on the number of annual rental days during the lawsuit. Even so, the core components of permitting, local oversight, and nuisance regulation remained and were validated.

Takeaways from Holland: The Holland case shows that if a locality doesn’t outright ban STRs, it can impose rigorous requirements to address community impacts. It also illustrates the importance of enforcement: Holland’s ordinance clearly spelled out that licenses can be revoked for non-compliance, setting a clear outcome for owners who do not follow the rules.

Village of Ashwaubenon

Our immediate neighbor to the west, the Village of Ashwaubenon, updated its short-term rental ordinance in May 2023 amid growing complaints and in anticipation of future demand during the 2025 NFL Draft in Green Bay.⁴⁶

Ashwaubenon’s new ordinance made headlines for establishing a minimum stay requirement: all non-owner-occupied STRs in one- and two-family dwellings must be rented for at least 6 nights and 7 days per stay.⁴⁷ In other words, it effectively banned weekend-only rentals for those properties. Owner-occupied STR units were exempted from this minimum, under the rationale that an on-site owner mitigates issues and should have more flexibility. To avoid penalizing

⁴³ Town of Holland (Sheboygan County, WI), *Ordinance No. 3-2018: Short-Term Rental Licensing Ordinance*

⁴⁴ Town of Holland (Sheboygan County, WI), *Ordinance No. 3-2018: Short-Term Rental Licensing Ordinance*

⁴⁵ Remzy D. Bitar, “Short-Term Rentals”

⁴⁶ Ben Krumholz, “Short-term rentals in Ashwaubenon get new restrictions after residents’ complaints,” FOX 11 News (WLUK), May 23, 2023 (updated May 24, 2023), accessed August 12, 2025, <https://fox11online.com/news/local/ashwaubenon-lambeau-field-green-bay-packers-airbnb-restrictions-ordinance-neighborhoods-northeast-wisconsin-rental-permit-nuisance>

⁴⁷ Samantha Cavalli, “Ashwaubenon Village Board Approves Short-Term Rental Ordinance Requiring a 6-Night Minimum Stay,” WBAY, May 23, 2023, <https://www.wbay.com/2023/05/24/ashwaubenon-village-board-approves-new-short-term-rental-ordinance-requiring-6-night-minimum-stay/>

existing hosts abruptly, Ashwaubenon grandfathered current license holders through June 30, 2024 before the rule fully applied.

Ashwaubenon also imposed a 180-day annual cap on rental days (the Village board explicitly included “180 consecutive days” and then clarified it as 180 total days by striking the word “consecutive” in their meeting). New STR licensees as of mid-2023 are bound by this 180-day limit.

The impetus for Ashwaubenon’s stricter rule was the stream of complaints from residents about noise, parties, and a sense that residential areas were turning into motel strips solely for Packer weekends.⁴⁸ Village officials noted that prior to the change, they had no minimum stay and no cap, and some houses were rented to different groups every few days, which the neighborhood found disruptive. By requiring a 7-day minimum, they aimed to discourage people from renting a house just to host a big one-night party. It forces a different business model, catering to families or groups who want a longer vacation. The inclusion of the owner-occupied exemption was an important compromise, reflecting that when the homeowner is present, the dynamic is more like a traditional bed-and-breakfast and problems are rarer.

Ashwaubenon officials openly acknowledged the trade-off: this rule would likely reduce the number of STR bookings, and even the number of STR properties in the long run, but they felt it was necessary to avoid losing “the fabric of [our] community.”⁴⁹ They faced pushback from some STR owners and notably from the Wisconsin Realtors Association, which threatened legal action, arguing the 7-day minimum might violate state law or property rights. The Realtors Association has at times challenged local STR rules they see as too restrictive, but no suit moved forward after an initial complaint letter in 2024.⁵⁰

Takeaways from Ashwaubenon: This case study shows a local government using the full extent of state-allowed STR restrictions to curb what it perceived as excessive STR activity. The 7-day minimum is the strictest tool available, and Ashwaubenon’s implementation provides a model of how to do it in a tailored way. The 180-day cap and continued permit enforcement complement the minimum stay rule to ensure STR houses are more occasional rentals than constant ones.

Summary: Wisconsin communities have raised the bar on STR regulation within the confines of state law. The Town of Holland case illustrates that strict licensing and operational rules can survive legal challenges if grounded in safety and welfare concerns. The Ashwaubenon example shows how the use of maximum restrictions can directly address neighborhood concerns.

⁴⁸ Ben Krumholz, “Short-Term Rentals in Ashwaubenon Get New Restrictions After Residents’ Complaints,”

⁴⁹ Mary Kardoskee, interview by Frederica Freyberg, “Village Pres. Mary Kardoskee on Short-Term Rental Regulation,” *Here and Now* (PBS Wisconsin), June 28, 2024, video, 6:29, transcript, accessed September 30, 2025, <https://www.pbs.org/video/village-pres-mary-kardoskee-on-short-term-rental-regulation-oywzvkl/>

⁵⁰ Jeff Bollier, “Ashwaubenon Rejects Realtors Group Demand to Change Airbnb Rules,” *Green Bay Press-Gazette*, March 5, 2024, <https://www.greenbaypressgazette.com/story/money/2024/03/05/ashwaubenon-rejects-realtors-group-demand-to-change-airbnb-rules/72750443007/>

Recommendations

Based on our analysis of state law, local conditions, community complaints, owner input, equity considerations, and external examples, the Equal Rights Commission makes the following recommendations to the Common Council for improving short-term rental regulation in Green Bay. Our aim is to promote a fair, safe, and neighborly STR market that aligns with the City's housing and community goals.

1. Strengthen Nuisance Mitigation and Neighborhood Protections

Adopt clear, enforceable standards to prevent and address common STR nuisances (noise, trash, parking, etc.), and ensure STR owners are accountable for their guests' behavior. While Green Bay's current STR ordinance references general compliance with city laws, more specific references and proactive measures are warranted:

Quiet Hours & Noise Limits: Incorporate an explicit "quiet hours" provision for STRs (e.g., no outdoor noise audible at property lines after 10:00 PM) in the STR permit conditions. Green Bay should make it clear that excessive noise from an STR will result in a citation and/or count as a strike against the permit (see enforcement below). Require that owners include the City's noise rules in their rental agreements and in any house rules provided to guests. Guests should be informed before check-in that Green Bay enforces quiet hours.

Occupancy Limits: Consider setting a reasonable maximum occupancy for STRs based on the dwelling size (for example, no more than 2 adults per bedroom, or a flat cap like 12 persons for any STR). Overcrowded STR parties can be a source of noise and safety issues. A clear occupancy limit, tied to the permit, gives an enforceable standard.

Parking Requirements: Amend the ordinance to require STR owners to provide sufficient off-street parking for their guests or otherwise limit on-street parking. For example, require a demonstrated parking plan as part of the permit application: one off-street space for every 4 adults accommodated could be a guideline. If a property cannot meet the parking requirement (like an STR in a dense area with no driveway), the owner must explicitly inform guests of where they can and cannot park and perhaps limit the number of vehicles. This should also be communicated to neighbors and enforced via either parking enforcement or permit strikes if violated. Proactively, the City could produce a "Good Neighbor Parking Guide" for STRs, reminding guests not to block alleys, driveways, sidewalks, or to park on lawns--all existing rules that just need reinforcing.

Cleanliness: Hosts should also be required to keep the exterior of the property in neat condition (mow grass, shovel snow) just as any homeowner must; chronic complaints about property maintenance could trigger non-renewal of the STR permit, ensuring STRs do not become visibly neglected.

Neighbor Notification: Implement a system to improve communication between STR operators and neighbors. We recommend that upon receiving an STR permit, the owner (or City) notify the immediate neighbors with contact information for the local responsible party. This way, if an issue arises (noise, etc.), neighbors have the option to call the STR owner/agent directly to resolve it quickly, rather than always involving police or waiting for the City. In addition, the City can publicly list Short Term Rentals on its Open Data dashboard, increasing transparency about which properties are functioning as STRs. Finally, the City should add, advertise, and educate neighbors about a Short-Term Rental Complaint section to the City’s Request for Service website. That way, complaints can be logged to a specific address and followed up on by staff.

Taken together, these nuisance mitigation steps will help maintain the residential character and livability of neighborhoods even with STRs present. They also set clear expectations for guest conduct, which responsible hosts will enforce via rental contracts. The City could create a concise “Code of Conduct” for STR guests and require owners to post it in the home. By anticipating problems and responding decisively when they occur, Green Bay can show that we value both our residents’ peace and the success of responsible STRs. While these nuisance rules exist in city code, explicitly referencing them in the STR ordinance helps set clear guidelines to avoid permit revocation.

2. Establish a Three-Strikes Enforcement Policy for STR Permits

Implement a clear enforcement protocol whereby repeated violations by an STR owner or their guests will result in permit suspension or revocation.

We recommend a “three strikes and you’re out” policy:

Define what constitutes a “strike.” For example, a strike could be any citation or verified violation of either the STR ordinance or other city laws at the property. This could include police-documented nuisance violations, failure of the owner or local agent to respond to a complaint call, operating without required licensure, or other significant breaches like overcrowding beyond occupancy limit or not having the permit placard displayed after a warning has been issued. Minor infractions could be given warnings, but significant ones should count as strikes.

- If an STR property accrues three strikes within a 12-month period, the City should initiate proceedings to revoke or nonrenew the STR permit.
- Revocation should bar the owner from obtaining a new STR permit for a set period for that property, and possibly citywide, to prevent simply transferring it to a spouse’s name or another workaround. This creates a strong incentive to improve behavior after two strikes, or to exit the STR business if unable to operate responsibly.

Green Bay’s current ordinance already allows revocation or non-renewal for violations, but the criteria and process are not explicitly laid out. Formalizing the three-strike policy in the

ordinance or as an adopted policy will provide transparency and consistency. It is important that each strike is well-documented via police report or inspection report to withstand any legal challenge by the owner.

Enhanced local agent requirement: Part of enforcement should involve the local contact's performance. We recommend that if a neighbor or police attempts to reach the listed local agent about a serious issue and the agent is unresponsive, that itself should count as a violation by the owner. The owner designated that agent and is responsible for their availability. The ordinance can require that the local representative respond in-person or at least by phone within ½ hour of being contacted about an urgent issue. If they fail to do so, the City can issue a citation or strike. This ensures the system has teeth; it's not enough to simply name a local individual as the contact if that person never picks up the phone. Tying this to the strike system means owners will choose reliable contacts and impress upon them the importance of responsiveness.

By enforcing progressively (first incident: fine or warning; second: larger fine, notice of permit jeopardy; third: revocation) the City demonstrates fairness for STR owners but also resolve to protect the community from chronic offenders.

3. Treat STRs as Businesses: Adjust Permit Fees and Enforcement Resources

Elevate short-term rentals to a true business through appropriate fees and robust enforcement, aligning their regulatory treatment with other lodging businesses. If someone is operating an STR, especially as an investment property, they are effectively running a small lodging business. The City should regulate and charge accordingly, which will both fund program needs and discourage frivolous or marginal operators.

Key actions under this recommendation:

Increase the City's STR Permit Fee to be more in line with the upper end of Wisconsin municipalities and reflective of the administrative burden. Currently \$500 initial/\$250 renewal, the fee could be raised, for example, to \$1000 initial and \$500 annual renewal. However, we recognize fees should not be set so high as to be exclusionary or viewed as a ban. Any increase should be justified by increased services like funding an additional inspector or contracting a monitoring service. We recommend the Council direct staff to conduct a fee study comparing STR fees in peer cities and evaluating the full cost of our STR program. The Commission does not prescribe an exact number but suggests exploring an upward adjustment with revenues dedicated to STR enforcement and affordable housing initiatives if possible.

Annual Reporting Requirement: Treat STR permits like a business license that requires an annual report or renewal application detailing any changes. Green Bay already has annual renewal, but we could add that owners must report if they've had any evictions, safety incidents, changes in ownership or management, etc. This keeps information up to date and reinforces that this is an actively managed privilege, not a one-time license. The Town of Holland required

owners to re-submit updated info each year and voided the license upon change of ownership; Green Bay should do the same.

If implemented, we believe these steps will professionalize the STR sector under City oversight. Legitimate STR owners should have no objection to fair fees and regulations that mirror what any small B&B or motel faces. STRs historically flew under the radar of such requirements; we can now catch them up to appropriate standards.

By increasing fees and putting that revenue back into enforcement and community protection, Green Bay can ensure the STR program is self-sustaining and effective.

4. Impose an Annual Cap on Rental Days to Prevent Full-Time STRs

Limit the number of days per year a property can be rented on a short-term basis to 180 days) as allowed by state law, in order to preserve residential use and encourage a mix of rental activity. This recommendation directly addresses the housing availability and over-commercialization concern.

We propose the Council amend the ordinance to include: “No dwelling unit may be rented as a short-term rental for more than 180 consecutive days in a calendar year.” This aligns with the floor set by Wis. Stat. §66.1014(2)(d). Some points to consider in implementing this:

- The City could require STR owners to maintain an online booking calendar or log that can be provided on request to verify compliance.
- STR owners would be able to choose when their permit is issued when they would like to start their 180 days.

The Commission believes this measure will help prevent the worst-case scenario of homes becoming like hotels with permanent turnover. It’s a moderate approach used in several jurisdictions to balance interests. Importantly, it also signals to the community that these houses are still homes first, rentals second. At least half the year they cannot be filled with new guests every night.

We acknowledge that enforcing this may require trust and occasional verification. But since several Wisconsin municipalities have included the 180-day rule, we can look to their enforcement for guidance. The mere presence of the rule may dissuade someone from purchasing a property solely for STR income, knowing they can only monetize half the year unless they get a long-term tenant for the rest.

5. Consider a Minimum Stay Requirement With Exceptions

Evaluate the implementation of a minimum consecutive-night stay for STR bookings, with possible exceptions.

Options for Green Bay:

- A 6-day, 7-night minimum (the maximum allowed) mirroring Ashwaubenon’s approach. This regulation would effectively eliminate weekend-only rentals.

Owner-Occupied Exemption: If a minimum stay is imposed, we strongly recommend copying Ashwaubenon’s exemption for owner-occupied STRs. There is little rationale to ask someone who is renting out a room in their home, or their primary residence while on vacation, to find week-long renters only. The problems we’re targeting typically arise when the owner is absent. So, an owner-present scenario should be exempt or at least given a far shorter minimum.

A minimum stay requirement is a powerful tool to reduce the rapid turnover and anonymizing effect of STRs. It is not a panacea, but it’s an option Green Bay should weigh, learning from Ashwaubenon’s early experience.

6. Improve the STR Registration Process with a User-Friendly Online System

Make it easier for owners to comply with the rules by streamlining the permit application and renewal process, ideally through an online portal. A simpler process will increase compliance rates and data accuracy, and reduce staff workload in the long run.

Currently, applying for an STR permit in Green Bay requires filling out forms (either PDF or in person), providing documentation, and making payment via check or in person. Some aspects, like obtaining the health license, involve separate steps with the county. That process can be burdensome, especially for new hosts. We recommend:

Adopting an Online Permit Portal: The City should deploy an online platform where STR owners can create an account, input all required information, upload documents, and pay fees electronically. This portal can integrate with our databases so that renewals are as easy as logging in, updating any changed info, and submitting payment. Ideally, it should also interface with Brown County’s health department or at least guide the applicant through that step. We have an example to follow: Sheboygan County’s Short-Term Rental Application Portal, which towns like Holland use.⁵¹ That system (provided by Host Compliance/Granicus) allows online filing of STR license applications and tracks things like insurance certificates and state seller’s permits. The City of Sheboygan itself also uses Host Compliance for permitting and room-tax reporting. Green Bay could contract a similar service or build one in-house. Given our number of STRs is growing, a dedicated portal may be worth its cost in increased efficiency.

One-Stop Shop Information: On the City website, consolidate all information related to STR regulations, permits, room tax, contacts, etc., in one easy location. The current page is a good start, but could be expanded. The Village of Lake Delton, for example, provides a step-by-step

⁵¹ Town of Holland, *Short-Term Rental Application Portal Guide*, February 27, 2020, accessed July 12, 2025, https://townofholland.com/wp-content/uploads/2020/05/20200227_STR_ApplciationPortalGuide.pdf.

checklist for applicants.⁵² Additionally, once an online system is in place, consider making certain data public. For instance, a list or map of licensed STR addresses so neighbors can verify if a house is licensed and the designated local contact phone number. Transparency can help community acceptance and compliance.

Automatic Notifications: Use the permitting system to send automated reminders to STR owners about key obligations, renewal reminders, reminders to schedule annual health inspections, etc. Also possibly push out seasonal reminders (e.g., at the start of summer, a reminder about noise and parking rules to all owners, suggesting they communicate with their upcoming guests). These small communications can improve adherence to rules.

Integration with Enforcement: The system should log complaints and violations so that when staff review a renewal, they can see the history. If an STR had issues, perhaps flag it for closer review before renewing. Conversely, a spotless record could mean a quick online auto-renewal with minimal staff intervention.

By lowering the barrier to comply, we remove excuses for those who currently operate under the radar claiming the process is too difficult. It also demonstrates that the City is not trying to trap or trick STR hosts; we genuinely want them registered and following the rules, and we'll make it as convenient as possible to do so.

Conclusion

The Green Bay Equal Rights Commission appreciates the opportunity to advise the Common Council on this important issue at the intersection of tourism, housing, and equal rights. Short-term rentals in Green Bay are a reality of the modern economy that bring benefits and challenges. Our goal, guided by the principles in our 2023 housing equity report, is to ensure that the rise of STRs does not compromise residents' quality of life or equal access to housing. We believe the set of recommendations in this report creates a path to that balance. They draw upon best practices from other municipalities and are tailored to Green Bay's legal and local context, respecting the rights of property owners under state law while asserting the City's authority to protect community welfare.

In summary, we recommend the Council enact a more robust STR ordinance and set of procedures that: require higher standards of conduct and enforce them through a three-strike rule and other penalties; treat STR operations as the regulated businesses they are, with appropriate fees and oversight; guard against the loss of residential housing to all-year tourist use, via an annual rental cap and minimum stay requirement; and support both neighbors and responsible hosts through better tools, information, and engagement. Collectively, these actions will help

⁵² Village of Lake Delton, "Tourist Rooming House," Village of Lake Delton (official site), accessed September 30, 2025, <https://www.lakedeltonwi.gov/203/Tourist-Rooming-House>

integrate short-term rentals more harmoniously into our neighborhoods, mitigating the negatives and preserving the positives.

It is the Commission's view that implementing these measures will result in safer, quieter, and more stable neighborhoods, without eliminating the economic opportunities STRs provide. More importantly, it will affirm the City's commitment to equitable housing opportunities, by preventing unchecked STR commercialization from eroding the long-term housing market. This aligns with the vision we set forth in "Life, Liberty, and the Pursuit of Happiness: Recommendations to Promote Equal Housing Opportunity in Green Bay," wherein every resident should have a fair chance at a decent home, a vision we can uphold by thoughtfully regulating alternative uses like short-term rentals.

The Commission urges the Common Council to refer some, or all recommendations outlined in this report to the appropriate City planning and legal staff to draft policy and/or ordinance amendments reflecting these points.