

Short-Term Rental Materials

April 10, 2020 | Cover Sheet

Behind this cover sheet are a series of documents in this order.

Fact Sheet – 4/10/20

Draft Short-term Rental Code – 4/10/20

- Draft Code
- Attachment: Map Combination: Overlay Options Leavenworth Lake Wenatchee Area

Supplemental Public Comments – 4/1 to 4/3/20

Summary Options and BOCC Direction – 3/31/20

Situation Assessment – 3/30/20

Chelan County Short-Term Rentals 2020 Fact Sheet

April 10, 2020

What is a short-term rental?

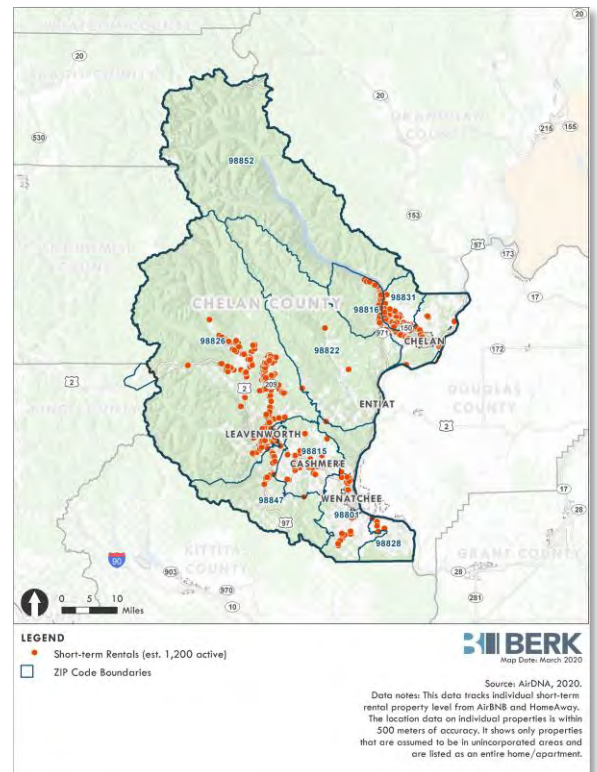
A short-term rental refers to a residential dwelling rented out on a nightly basis for less than 30 days to individual guests. It could be a whole home or just part of it.

Where are short-term rentals in unincorporated Chelan County?

Short-Term Rentals are found across the county, but particularly in the Leavenworth-Peshastin area, Lake Wenatchee, Manson and Chelan.

How fast have short-term rentals grown in the County?

The number of short-term rentals has increased rapidly in the last six years especially in Leavenworth and Manson areas.



Unincorporated Chelan County Listings December 2014-19: AirBnB & Home Away Monthly Data

| Zip Code | Zip Code Place | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 |
|--------------------|----------------|-----------|------------|------------|------------|--------------|--------------|
| 98815 | Cashmere | | 4 | 11 | 25 | 30 | 35 |
| 98816 | Chelan | 1 | 3 | 14 | 64 | 60 | 75 |
| 98822 | Entiat | | 3 | 4 | 4 | 2 | 2 |
| 98826 | Leavenworth | 59 | 110 | 205 | 611 | 816 | 868 |
| 98828 | Malaga | 1 | 2 | 2 | 4 | 4 | 4 |
| 98831 | Manson* | 6 | 9 | 56 | 212 | 215 | 229 |
| 98847 | Peshastin | 4 | 8 | 16 | 41 | 47 | 56 |
| 98801 | Wenatchee | 5 | 6 | 14 | 25 | 32 | 39 |
| Grand Total | | 76 | 145 | 322 | 986 | 1,206 | 1,308 |

Note: *Includes about 83 units in 2019 on tribal land.

Source: AirDNA, BERK 2020

What is the goal of short-term rental regulations?

The goal is to allow for property owner income while protecting the character of residential communities across the county.

What happened to the draft proposals in 2019?

In 2019 Chelan County considered draft regulations. The Planning Commission and Board of County Commissioners heard comments and felt proposals didn't meet the County's and community's needs, and denied the 2019 draft. The Board of County Commissioners desire to look at new code options in 2020. See below for an update on 2020 draft regulations and how you can participate.

What is covered in the draft regulations in 2020?

In 2020, an initial draft set of regulations includes the following features.

| # | Topic | Approach in Draft Code on Short-Term Rentals |
|---|---|--|
| 1 | Establish protections for the supply and affordability of housing | Allow a small increase annually in short-term rentals, e.g. 1% countywide. In areas with a high concentration, maintain existing short-term rentals but restrict new ones. |
| 2 | Preserve neighborhood quality | Address nighttime and daytime occupancy, managing parking, restricting trespass, ensuring solid waste management, etc. |
| 3 | Create protections for the wellbeing of guests | Provide for property management plan, health and safety, inspections by fire and health officials at start, self-certification at annual renewal, and insurance. |
| 4 | Establish oversight and complaint procedures for the wellbeing of neighbors | Provide process for code compliance integrated with County code and state laws. |
| 5 | Preserve public tax revenues and level the playing field | Require short-term rentals owners/operators to comply with local and state tax requirements. |
| 6 | Regular permitting & record keeping | Provide process for initial permit and annual renewal. |
| 7 | Establish clear definitions | Consider state definitions and adapt for local needs. |

How can you provide input on Chelan County's draft regulations in 2020?

Chelan County is interested in your views on draft short-term rental regulations. In 2020, the County anticipates a review and comment process following the steps below. Check out the County's webpage for meeting information and background documents: <https://www.co.chelan.wa.us/community-development>



For questions about the process and next steps, please contact:

Kirsten Larsen, AICP, Planning Manager Community Development Department

316 Washington Street, Suite 301, Wenatchee, WA 98807

(509) 667-6225 | Kirsten.Larsen@co.chelan.wa.us

Sign up for newsletter updates here: <https://www.co.chelan.wa.us/community-development/forms/join-newsletter>

Chelan County

Draft Short-term Rental Code

DRAFT April 10, 2020

Discussion notes are identified in italicized blue text. Code proposals are in standard text format for all new sections; or, in some cases track changes to amended sections are shown in ~~strikeout~~ or underline. Additional review is pending with the Prosecuting Attorney's office and other adjustments may be proposed.

Use Allowance Amendments

CHAPTER 11.04 DISTRICT USE CHART

Discussion: Targeted edits are proposed to add short-term rentals to the use table for rural and resource areas. Short-term rentals would be allowed in all rural designations that allow residential or commercial uses including zones where the purpose is recreational residences. The number would be limited by the 1% cap and short-term rental overlays to control density (see new subsection 11.88.280), and thus the zone allowances are more permissive due to other means of limiting such uses.

11.04.020 District Use Chart

The use chart located on the following pages is made a part of this section. The following acronyms apply to the following use chart. If a cell in the table is blank, the use listed in the left hand column is a prohibited use in the zone that is the heading for that cell.

- P — Permitted use
- P(1) — Permitted use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards
- P(2) — Permitted use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards, except for on parcels that are twelve thousand square feet or smaller, the use/structure must be located on a lot with an existing single-family residence
- A — Accessory use
- A(1) — Accessory use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards
- CUP — Conditional use permit

District Use Chart

| USE/ACTIVITY | RR20 | RR10 | RR5 | RR2.5 | RW | RRR | RV | RC | RI | RP | AC | FC | MC |
|---------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----|----|------------|------------|------------|
| <u>Short-Term Rentals</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(2)</u> | | | <u>CUP</u> | <u>CUP</u> | <u>CUP</u> |

CHAPTER 11.22 PESHAstin URBAN GROWTH AREA

Discussion: This set of amendments treats short-term rentals similar in the Peshastin and Manson UGAs. The cap of 1% and limits on the location and share of short-term rentals in UGAs is found in the new subsection 11.88.280.

11.22.030 Permitted, Accessory and Conditional Uses

(1) A district use chart is established and contained herein as a tool for the purpose of determining the specific uses allowed in each use district. No use shall be allowed in a use district that is not listed in the use chart as either permitted, accessory or conditional use, unless the administrator determines, by a written administrative interpretation that may be appealed to the hearing examiner, that an unlisted use is similar to one that is already enumerated in the use chart and may therefore be allowed, subject to the requirements associated with that use and all other applicable provisions.

(2) The following acronyms apply to the following use chart:

Uses:

PRM = Permitted use

ACC = Accessory use

CUP = Conditional use

Where a cell is empty, the use is prohibited in that zone. All of these assume compliance with any and all development standards.

Districts:

R-1 = Low Density Residential

R-2 = Medium Density Residential

R-3 = High Density Residential

C-D = Downtown Commercial

C-H = Highway Commercial

I = Industrial

I-C = Campus Industrial

P-U = Public Use

| Land Uses | R-1 | R-2 | R-3 | C-D | C-H | I | I-C | P-U |
|---------------------------|------------|------------|------------|------------|------------|---|-----|-----|
| RESIDENTIAL USES | | | | | | | | |
| <u>Short-Term Rentals</u> | <u>PRM</u> | <u>PRM</u> | <u>PRM</u> | <u>ACC</u> | <u>ACC</u> | | | |

¹ In existing single-family residences only, as of July 1, 2008.

² Indoor facility only.

CHAPTER 11.23 MANSON URBAN GROWTH AREA

Discussion: This set of amendments treats short-term rentals similar in the Peshastin and Manson UGAs. The cap of 1% and limits on the location and share of short-term rentals in UGAs is found in the new subsection 11.88.280.

11.23.030 District use chart.

The use chart located on the following pages is made a part of this section. The following acronyms apply to the following use chart. If a cell in the table is blank, the use listed in the left hand column is a prohibited use in the zone that is the heading for that cell.

| | |
|-----|-------------------------|
| UR1 | Urban Residential-1 |
| UR2 | Urban Residential-2 |
| UR3 | Urban Residential-3 |
| CT | Tourist Commercial |
| CD | Downtown Commercial |
| MLI | Manson Light Industrial |
| UP | Urban Public |

P Permitted use—Subject to development standards in Chapter 11.88 and/or 11.93

A Accessory use—Subject to development standards in Chapter 11.88 and/or 11.93

CUP Conditional use permit—Subject to development standards in Chapter 11.93 and/or within this chapter

Table 9.1 – District Use Chart

| USE/ACTIVITY | UR1 | UR2 | UR3 | CT | CD | MLI | UP |
|--|----------------|----------------|----------------|----------------|----------------|-----|----|
| Vacation-Short-Term Rentals | P ¹ | P ¹ | P ¹ | A ¹ | A ¹ | | |

P¹ = Permitted with Standards

11.23.040 STANDARDS.

(3) ~~Vacation-Short-Term~~ Rentals. ~~See 11.88.280 Short-Term Rentals. Vacation rentals, any unit being rented for less than thirty consecutive days, shall be permitted as identified in Section 11.23.030, District use chart. All vacation rentals shall receive an annual permit from January 1st to December 31st, under Title 14 limited administrative review, documenting conformance and agreement to conform to the following provisions:~~

~~(A) Vacation rentals shall maintain the character of the surrounding neighborhood by:~~

~~(i) Providing year-around solid waste receptacles and pickup service. Trash cans, on the right-of-way, should be removed within twenty-four hours of pickup; and~~

~~(ii) Provide at least one off-street parking space, outside of the required setbacks for each two rented bedrooms. Where off-street parking requirements cannot be met the number of rented bedrooms shall be limited; and~~

~~(iii) Noise emanating from any use shall be in conformance with Chapter 7.35; and~~

~~(iv) Occupancy. The maximum number of occupants permitted to stay overnight shall be two people for each bedroom plus two additional persons, excluding children under the age of six, and~~

~~(v) Placing, adjacent to the front door (outside), a legible sign clearly visible to the general public listing the maximum number of occupants permitted to stay overnight, the maximum number of vehicles allowed to be parked on site, and the name and contact information of the local contact person.~~

~~(B) Vacation rentals shall provide a local contact person (within a forty-mile radius) twenty-four hours a day seven days a week. Contact information shall be provided to the adjacent properties, the Manson community council, District 5 fire chief, and the Chelan County sheriff.~~

~~(C) Enforcement. Any violation of the provisions of this chapter is punishable pursuant to Title 16. Enforcement actions may be brought against the owner of the vacation rental home for the conduct constituting the violation.~~

Short-Term Rental Standards

Section 11.88.280 is all new.

CHAPTER 11.88 SUPPLEMENTARY PROVISIONS AND ACCESSORY USES

11.88.280 Short-Term Rental Regulations

(1) PURPOSE

Based on language in Dan Beardslee's proposal.

- (A) The purpose of this section is to establish regulations for the operation of short-term rentals as defined in Chelan County Code (CCC) 14.98.1692, within the unincorporated portions of Chelan County. This chapter also establishes a short-term rental land use permit.
- (B) The provisions of this chapter are necessary to promote the public health and safety by protecting year-round residents' enjoyment of their homes and neighborhoods by minimizing the impact of short-term rentals on adjacent residences.

(2) NUMBER AND LOCATION

The 1% cap and associated zone allowances are similar to options described in the Chelan County Short-Term Rental Situation Assessment & Options, March 30, 2020. There is a simpler permit allowance in the use tables because their number and density are limited in (A) and (C) below.

- (A) Number. The annual number of new short-term rental land use permits issued must be capped to one percent (1%) of the total number of permitted short-term rentals in the county as determined through land use permit procedures in subsection (4) below.

The County has applied city zones in UGAs. If there is no reference to allowable uses in city-assigned UGAs there could be confusion since these city zones do not appear within the County Code. The County would allow short-term rentals if the cities allow them in the subject city zones in the UGA, but the permitting procedures would be those the County adopts. To avoid future nonconformities since cities have different review procedures and operational rules, it may be

appropriate to allow existing legal short-term rentals in the UGAs and avoid adding new ones until such time as they annex or until the County adopts city review procedures where feasible (note: the County does not appear to have the same business license regulatory allowances as cities though land use authority is similar).

(B) Zones Allowed. Short-term rentals must be permitted, accessory permitted, conditionally permitted, or prohibited pursuant to:

- (i) Section 11.04.020 applicable to all Rural and Resource Designations, except as limited in Subsection (2)(C) Leavenworth–Lake Wenatchee Overlay, and in Subsection (2)(D) Density Limits.
- (ii) Section 11.22.030 applicable to the Peshastin Urban Growth Area, except as limited in Subsection (2)(D) Density Limits.
- (iii) Section 11.23.030 applicable to the Manson Urban Growth Area, except as limited in Subsection (2)(D) Density Limits.
- (iv) In city-assigned Urban Growth Areas, pursuant to a city’s land use regulations, development standards, and land use designations, where the County has adopted such pursuant to the County-City Memorandum of Understanding filed with the Chelan County Auditor July 8, 1997; provided that, the County’s review procedures in this subsection 11.88.280 must control.

Discussion: Census Tract 9602 is similar in size and boundary as the corresponding zip code. Data about housing and population is produced by federal agencies by census tract as well as by the State Office of Financial Management (OFM). The State OFM also produces data by zip code though federal census data would not be available. Tracking permit applications by zip code could make it simpler to enforce the locational allowances. Another option would be to use finer-grained HUC-12 boundaries, used in watershed planning; however, it would be more difficult to track population and housing information by them. It would allow a more targeted planning boundary to be created. We recommend the Zip Code boundary for the greatest ease of code and permit implementation while still having state population and housing information tracked. Different mapping options are attached.

(C) Leavenworth–Lake Wenatchee Overlay Established. An overlay district within which density limits are applied is hereby established as co-terminus with **[Zip Code 98826]** encompassing Leavenworth–Lake Wenatchee.

Density limits are meant to reduce the share of short-term rentals over time in impacted locations to address community compatibility and housing affordability. In city-assigned UGAs density limits are meant to minimize nonconformities with city regulations particularly where there are city licensing requirements. Recognizing there are likely to be reductions in short-term rentals over time if the percentage share is reduced to a level that appears to have less impact on housing supply the County could begin allowing them again; for example, after three years when the County has determined the 1% cap annually and licensed existing and new ones it may have data supporting the timing of re-opening these areas. The percent share of short-term rentals is “blank” for this draft pending discussion. A rate of 5% percent has been suggested by public comments to date. Data tracked in the situation assessment show the most affected Zip Codes with over 5% to over 10%. A study of Oregon jurisdictions¹ found that where short-term rental growth and household formation is increasing at a faster rate than total housing unit growth there can be a constraint on housing affordability; the rate of short-term rental growth has been occurring faster than new home construction in

¹ See copy of study hosted by the City of Olympia’s website: <https://engage.olympiawa.gov/4076/documents/5992>.

the Leavenworth Zip Code within unincorporated areas. The Zip Codes with greater than 10% share of short-term rentals compared to total dwellings within unincorporated areas include Leavenworth (12.3%) and Manson (11.2%). Peshastin Zip Code is at 5.5%. Chelan is 1.8% and others are less than 1%.

(D) Density Limits.

(i) The number of short-term rentals established in (2)(A) may locate in the zones where permitted or accessory permitted in (2)(B), except that existing legal short-term rentals as of the effective date of this code (XXX, 2020) are permitted and no new short-term rentals are permitted in the following locations:

- (a) Leavenworth–Lake Wenatchee Overlay and all associated base zones therein
- (b) Residential zones in the Peshastin Urban Growth Area
- (c) Residential zones in the Manson Urban Growth Area
- (d) Residential zones in the UGAs assigned to the cities of Chelan, Entiat, Leavenworth, or Wenatchee

(ii) After three years from the effective date of this code (XXX, 2020), new short-term rentals may be established in the locations cited in subsection (2)(D)(i) if the percentage of short-term rentals as a share of total dwelling units is less than X percent (X%) and the applications meet all requirements of this section 11.88.280 as determined by the Director.² Total dwelling units must be determined based on the latest annual count of total housing units by the State of Washington Office of Financial Management. Short-term rental percentages must be determined at the time the number of allowed short-term rentals is determined per subsections (2)(A) and (3) of this section.

(3) SHORT-TERM RENTAL STANDARDS

(A) Primary or Accessory Residence. Short-term rentals must be operated out of an owner's primary residence or a legally established accessory dwelling unit. In no case, shall an owner or operator make available a recreational vehicle, tent, or other temporary or mobile unit for short-term rental.

(B) Occupancy.

(i) Overnight Occupancy. The owner or operator must limit overnight occupancy to no more than two guests per bedroom, not to exceed a total of 10 guests. A guest is a person over six years of age. Occupancy limits must comply with the International Residential Code. Advertisement of bedrooms is proof of the number of bedrooms.

(ii) Daytime Occupancy. At no time shall the total number of persons at a short-term rental exceed 10 persons, including children.³

² Per 14.98.580 Director. "Director" means the director of the Chelan County department of community development or designee. This term is synonymous with administrator.

³ Discussions with staff have indicated 10 has been considered recently, the same as the overnight occupancy. Other examples: [Ventura County, CA](#) allows a total of the maximum overnight occupancy plus 6 additional persons; twice the night-time limit. [Forsyth County, GA](#), allows 4 plus total overnight guests excluding children.

(C) Parking. At least one additional off-street parking space must be provided for the short-term rental in addition to the parking required for the dwelling per CCC 11.90, Off-Street Parking and Loading. The number of vehicles allowed at the short-term rental must be limited to the number of bedrooms plus one; this requirement must be included in the Property Management Plan per Section (2)(K).

(D) Garbage. Trash and recycling containers must be provided. Trash and recycling must be in proper containers on collection day. Receptacles must be set out on the right-of-way and removed within twenty-four hours of pickup. Trash must be managed in compliance with CCC Chapter 4.04 Garbage. This requirement must be included in the Property Management Plan per Section (3)(K) and good neighbor guidelines per subsection (3)(M).

(E) Noise. Short-term rentals must be operated in compliance with Chapter 7.35 Noise Control. This requirement must be included in the Property Management Plan per Section (3)(K).

(F) Trespass. Owners or operators must provide rules in rental contracts restricting occupants from trespassing on neighboring private property and identify proper routes to public places such as easements to shorelines. Such trespass rules must be included in the property management plan in (3)(K) and good neighbor guidelines per subsection (3)(M).

(G) Signs. All owners or operators must display the address of the residence so that it is clearly visible from the street or access road. The rental must have a sign or other identifier on outside as short-term rental. The sign must be made of natural materials not exceeding two square feet in area and if illuminated, must be indirectly illuminated.

(H) Consumer Safety. All Consumer Safety requirements of RCW 64.37.030 must be met by the owner or operator. Violations are subject to Title 16. Requirements must be included in the property management plan in (3)(K).

(I) Fire Safety and Outdoor Burning. Each owner or operator must include a fire protection plan in their property management plan in subsection (3)(K) to alert renters to respect firewise efforts on a property, or to comply with travel or activity restrictions of CCC Chapter 7.52, Fire Hazard Areas. This includes, but is not limited to, restricting use of outdoor fire places or grills and to properly secure and restrict portable barbeques.

(J) Qualified Person.

(i) The owner or operator must provide the name, telephone number, address, and email of a qualified person (which can be a person or company) who can be contacted concerning use of the property and/or complaints and can respond to the property within 30 minutes to complaints related to the short-term rental consistent with the requirements of this section. The owner or operator must provide a valid telephone number where qualified person can be reached 24 hours per day, every day.

(ii) The owner or operator must post a sign of similar materials and dimension as subsection (3)(G) with the contact information of the qualified person. If the permanent contact information changes during the permit period, the new information must be changed on the sign. Renewal applications must provide evidence of the sign. The Director may allow annual mailings to neighboring properties and an interior posted notice for tenants in lieu of an exterior sign where a property's size and visibility make an exterior sign ineffective. The purpose of this sign is so that adjacent property owners and residents

can contact a qualified person to report and request resolution of problems associated with the operation of the short-term rental.

(K) Property Management Plan. Vacation rentals must maintain an up-to-date property management plan on file with the Chelan County Community Development Department and property owners within 300 feet of the building within which the short-term rental is located. The property management plan must include the following:

- (i) Provide a map clearly depicting the property boundaries of the short-term rental, and the escape route in case of an emergency. The map must indicate if there is an easement that provides access to the shoreline; if so, the boundaries of the easement must be clearly defined. If there is no access, this must be indicated together with a warning not to trespass;
- (ii) Provide the unified business identifier number, and the names and addresses of the property owner;
- (iii) Designate a qualified person and provide contact information consistent with (3)(j) ; and
- (iv) Provide information required for Consumer Safety per (3)(H) and RCW 64.37.030 and fire protection plan per (3)(I).

(L) Annual Permit Number. The owner or operator must include the Chelan County land use permit number for the short-term rental in all advertisements (AirBnB, VRBO, Craigslist, poster, etc.) and marketing materials such as brochures and websites.

(M) Good Neighbor Guidelines. Owners and operators must acknowledge receipt and review of a copy of the good neighbor guidelines. Owners and operators must provide evidence that the good neighbor guidelines have been effectively relayed to short-term rental tenants, by incorporating it into the property management plan, and rental contract, posting it online, providing it in a conspicuous place in the dwelling unit, or a similar method.⁴

(N) Liability Insurance. A short-term rental owner or operator must maintain primary liability insurance consistent with RCW 64.37.050.

(O) Taxes. The owner or operator must be in compliance with CCC Chapter 6.30 Lodging Tax, and other local sales taxes and state hotel/motel and sales taxes in accordance with the Department of Revenue.

(4) LAND USE PERMITS

Per the draft code, the County would require annual renewal of existing units in one period (e.g. September-October). The Community Development Department would have about 90 calendar days [~60 workdays] to permit the compliant applications (November-January). The Director would report on the new baseline short-term rentals, to establish the maximum number of new short-term rentals by February 1 of the following year. New short-term rentals could apply within a subsequent two month window (e.g. February-March).

⁴ See Bend, Oregon example: See example on page 21 of City of Chelan Ordinance:

<https://cityofchelan.us/pdffdocs/2019/12/Ord2019-1570-Short-Term-Rental-Regulations-with-Exhibits.pdf>. Similar to example on page 21 of City of Chelan Ordinance: <https://cityofchelan.us/pdffdocs/2019/12/Ord2019-1570-Short-Term-Rental-Regulations-with-Exhibits.pdf>.

If the county finds that the fire and health district do not have sufficient resources to provide inspections within the first permit window, the County could provisionally approve initial short-term rental applications without inspection provided the inspections occur prior to the first renewal and provided there are signed-self-certification forms. This was allowed by the City of Chelan in its short-term rental code. Alternatively a different first-year window could be provided.

(A) Land Use Permit Required. No short-term rental owner or operator may advertise, offer, operate, rent, or otherwise make available or allow any other person to make available for occupancy or use a short-term rental without a valid short-term rental land use permit issued by the Director.

(B) Annual Renewal. Annual renewal of the short-term rental land use permit is required.

(C) Permit Applications. Short-term Rental owners must apply for a land use permit to establish compliance with this code.

(D) Application Acceptance.

(i) From September 1 to October 31 each year, existing short-term rental owners must submit a Short-Term Rental Land Use Application. By February 1 of each following year the Director must report the baseline number of authorized existing short-term rentals and identify the number of new short-term rentals allowed pursuant to subsection (2)(A). From February 15 to April 15, the Director must accept new applications for short-term rentals. New short-term rental applications will be accepted on a first-come, first-served basis up to the cap allowed by subsection (2)(A). If found to meet approval criteria in subsection (4)(J), the Director must approve the Short-Term Rental Land Use Permit, which remains valid until such time as an annual renewal is required.

(ii) Within the first year of adoption of this code (effective date XXX, 2020), the Director may provisionally approve initial short-term rental land use permits subject to the owner completing a self-certification form provided that inspections in subsection (4)(H) are accomplished prior to the first renewal thereafter.

Term and applicant information is based on language in Dan Beardslee proposal. Nonuse is based on City of Chelan regulations.

(E) Term. A short-term rental land use permit must be issued for a period of one year, with its effective date running from the date the application is due as set forth in subsection (4)(D) above. and must be renewed annually by the owner or operator provided all applicable standards of this section are met.

(F) Forms and Procedures. Applications for short-term rental land use permits must be on forms provided by the County, demonstrating the application meets the standards required by this section. Permit review procedures must be consistent with Title 14.

(G) Nonuse. All short-term rentals must operate under a current short-term rental land use permit regardless of nonuse. If a property has not been rented in a twelve-month period, renewal of short-term rental land use permit must still be met to maintain the validity of the permit.

(H) Fire, safety, health and building compliance.

(i) Fire and Emergency Safety. Prior to approving the initial short-term rental permit, the applicable fire district or fire marshal must perform a life-safety inspection, except as provided under subsections (H)(iii) and (H)(iv).

(ii) Water and Wastewater. The Chelan-Douglas Health District must inspect the short-term rental to ensure that there is a verifiable legal source of water that meets applicable standards, and an approved on-site sewage disposal system, except as provided under subsections (H)(iii) and (H)(iv).

(iii) The Director may waive inspections under subsections (H)(i) and (H)(ii) associated with the initial short-term rental permit if the owner provides a notarized affidavit from the applicable fire district or fire marshal or Chelan-Douglas Health District that the short-term rental is in compliance with applicable requirements in subsections (H)(i) and (H)(ii).

(iv) The County building official must review each initial short-term rental application to ensure occupancy and other applicable building code requirements are met.

(v) After the unit is approved for rental, a completed self-certification checklist for health and safety is required to be submitted by the owner with each annual short-term land use permit renewal consistent with forms provided by the Director.

(vi) Owner Responsibility. It is the owner's responsibility to assure that the short-term rental is and remains in substantial compliance with all applicable codes regarding fire, building and safety, health and safety, and other relevant laws.

(I) Non-transferable. The short-term rental land use permit must be issued in the name of the owner and is not transferable. New owners must certify compliance with the conditions of permit approval within 90 days after the closing date of the sale of the property. Written certification must be submitted to the Community Development Department on forms specified by the Director. New owners must apply for a new permit by the annual deadline.

(J) Approval Criteria. To receive approval or renewal, an owner or operator must demonstrate to the satisfaction of the Director that all approval criteria listed below have been satisfied:

(i) The short-term rental is located in a base or overlay zone that allows its use pursuant to this section.

(ii) The short-term rental is consistent with density limitations of this section.

(iii) The short-term rental is consistent with short-term rental standards of this section.

(iv) The short-term rental is consistent with all applicable health and safety requirements of this section.

(v) The short-term rental is not the subject of outstanding code violations per Title 16.

(K) Appeals of the denial or conditions of short-term rental land use permits or annual renewals must be filed in compliance with Title 14 CCC.

(5) ENFORCEMENT

(A) Within Chelan County jurisdiction, a short-term rental must not operate without an approved and valid Short-Term Rental Permit. Evidence of operation includes advertising, online calendars showing availability, guest testimony, online reviews, rental agreements or receipts.

(B) Enforcement of this section will be in accordance with Title 16 CCC.

Definitions

14.98 DEFINITIONS

“Vacation Rental” is used in Manson UGA code and is defined as “any unit being rented for less than thirty consecutive days.” “Short-term rental” in RCW 64.37 excludes short-term rentals of less than three bedrooms or where the operator occupies the unit for at least six months. The City of Chelan definition is similar but more detailed than the Manson UGA definition, more inclusive than the state definition, and more similar to the discussion of the Board of County Commissioners and public to date. A blend of the Chelan and State definition is proposed.

Note: Consultants and County staff are reviewing definitions for other types of accommodations like bed and breakfasts, temporary dwellings, etc. to ensure ease of implementation and consistency with the Building Code.

14.98.1692 Short-Term Rental

“Short-Term Rental” means a dwelling unit, or portion thereof, that is offered or provided to a guest by a short-term rental owner or operator for a fee for fewer than thirty consecutive nights. They are commonly referred to as vacation rentals. They are a form of tourist or transient accommodations. Short-term rental units may be whole house rentals, apartments, condominiums, or individual rooms in homes. For the purpose of administration and enforcement of this title, the terms “overnight rental,” “nightly rental,” and “vacation rental” are interchangeable with short-term rentals. Subleasing or subletting of units for short-term rental is prohibited if the underlying zone prohibits such use.

The following definition is based on definitions in RCW 64.37, and in some cases the Chelan Municipal Code.

14.98.1693 Short-Term Rental Operator

“Short-term rental operator” means any person who receives payment for owning or operating a dwelling unit, or portion thereof, as a short-term rental unit, or their authorized agent including a property management company or other entity or person who has been designated by the owner, in writing, to act on their behalf.

The following definition is based on definitions in RCW 64.37.

14.98.1694 Short-Term Rental Owner

“Owner” means any person who, alone or with others, has title or interest in any building, property, dwelling unit, or portion thereof, with or without accompanying actual possession thereof, and including any person who as agent, executor, administrator, trustee, or guardian of an estate has charge, care, or control of any building, dwelling unit, or portion thereof. A person whose sole interest in any building, dwelling unit, or portion thereof is solely that of a lessee under a lease agreement is not considered an owner.

16.20. SHORT-TERM RENTAL ENFORCEMENT AND VIOLATIONS

Except for violations of RCW 64.37.030 Consumer Safety, which appears to have a specific process and fine to be issued by a county or city attorney, the code compliance process and civil penalties are consistent with Chelan County Code Title 16. It does not appear that RCW 64.37 limits a county’s authority to apply its own code compliance process when reviewing RCW 7.80.010 since it allows a county or city to hear and determine civil infractions

according to its own system established by ordinance. Per the discussion by the BOCC on March 31, 2020, on-site citations are allowed. Revocation is similar to the City of Chelan code, except it includes “three strikes” per the BOCC member code options dated January 27, 2020. Note this section is still pending review by the Prosecuting Attorney’s office.

16.20.010 Compliance

Short-term rental owner’s or operator’s must comply with short-term rental regulations in Titles 11 and 14 CCC. Violations and enforcement must be in accord with Title 16 CCC.

16.20.020 Enforcement Procedures, Notices, and Citations

- (1) Enforcement Procedures. Except as specified in this Chapter 16.20, all enforcement procedures of Title 16 apply to short-term rental owner’s or operator’s.
- (2) Notice of Violation for Consumer Safety by County Attorney. If an owner or operator is suspected of violating Consumer Safety requirements of RCW 64.37.030, the County Attorney must issue a warning letter to the owner or operator for the first violation. Other procedures or requirements with regard to the warning letter must be consistent with Title 16. For any repeated violations, the County will employ its standard code compliance process consistent with Title 16.
- (3) Citations must be issued consistent with Chapter 16.08, provided that citations may be issued on-site at the discretion of the code compliance officer if a violation of Short-Term regulations in Titles 11 and 14 CCC occurs. Alternatively, the citation may be accomplished in another manner consistent with Title 16.

16.20.030 Civil Penalties

- (1) Civil penalties must be consistent with Title 16 including Chapter 16.16. except as identified in (2) below.
- (2) The first violation of Consumer Safety requirements of RCW 64.37.030 is a class 2 civil infraction under chapter [7.80](#) RCW with a fine of one hundred twenty-five dollars (\$125). The fine for repeated violations must be consistent with CCC 16.16.010 Assessment Schedule.

16.20.030 Revocation

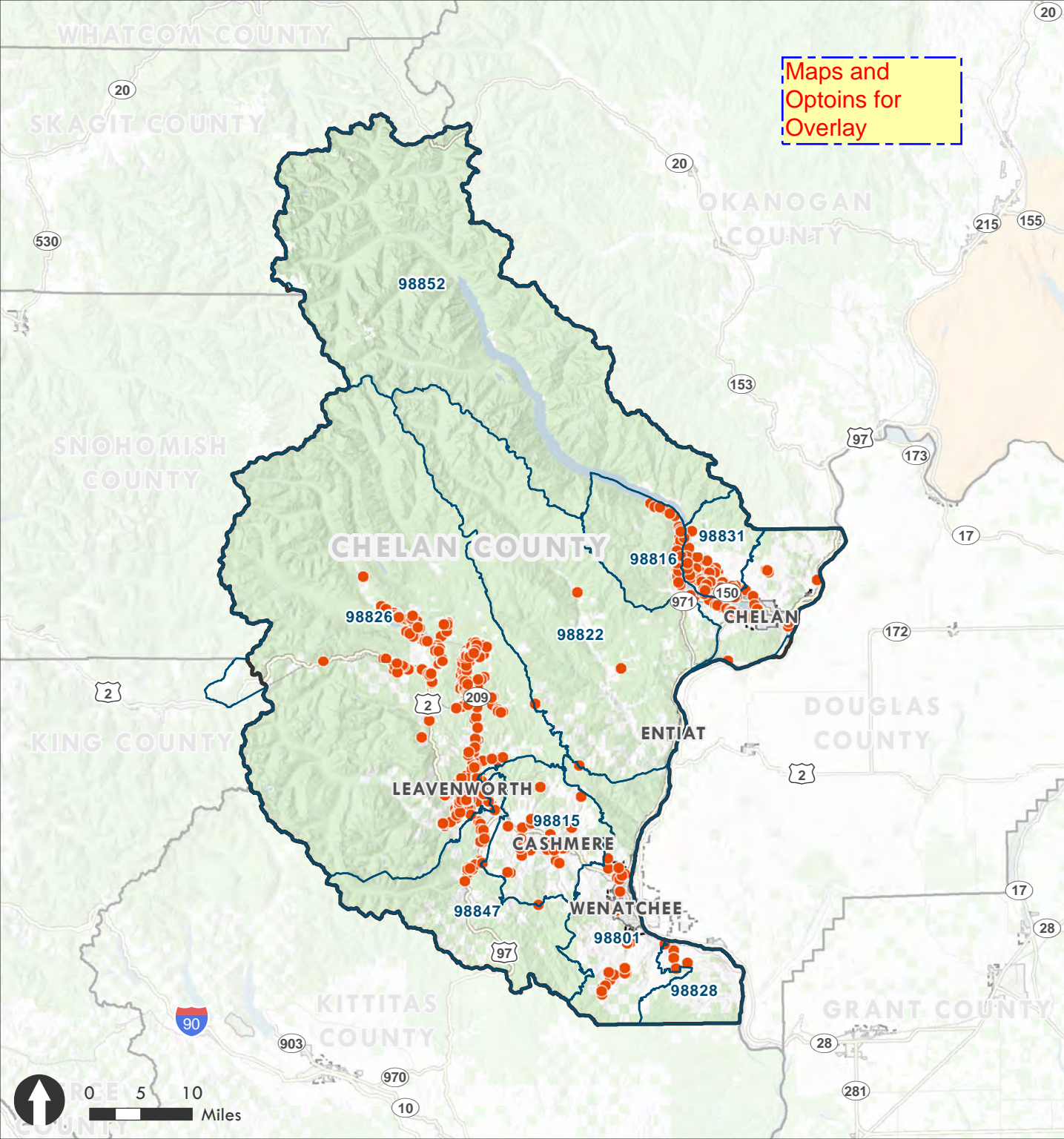
- (1) Repeated failure of the owner or operator to timely and reasonably respond to a complaint(s) relayed by code compliance officers are grounds for civil fines, revocation, or other penalties consistent with Title 16.
- (2) The following conditions may result in revocation of land use permits granted under short-term rental regulations in Titles 11 and 14 CCC:
 - (A) Failure to renew a short-term rental land use permit pursuant to CCC 11.88.280 short-term rental regulations and Title 14 is grounds for immediate revocation of the permit.
 - (B) Failure to meet the criteria of CCC 11.88.280 Short-Term Rental Regulations is grounds for immediate revocation of the short-term rental land use permit.
 - (C) The discovery of material misstatements or providing of false information in the short-term rental land use permit application or renewal process is grounds for immediate revocation of the permit.

(D) Such other violations of Titles 11, 14, and 16 of sufficient severity in the reasonable judgment of the Administrator,⁵ so as to provide reasonable grounds for immediate revocation of the land use permit.

(E) If three similar offenses occur at any time during a twelve-month period, the penalty shall be revocation in addition to any required civil penalties under 16.20.030.

Draft

⁵ In Title 16, reference is made to “Administrator” whereas in Title 11 reference is made to “Director”. Both have a similar meaning in Title 14 definitions.



LEGEND

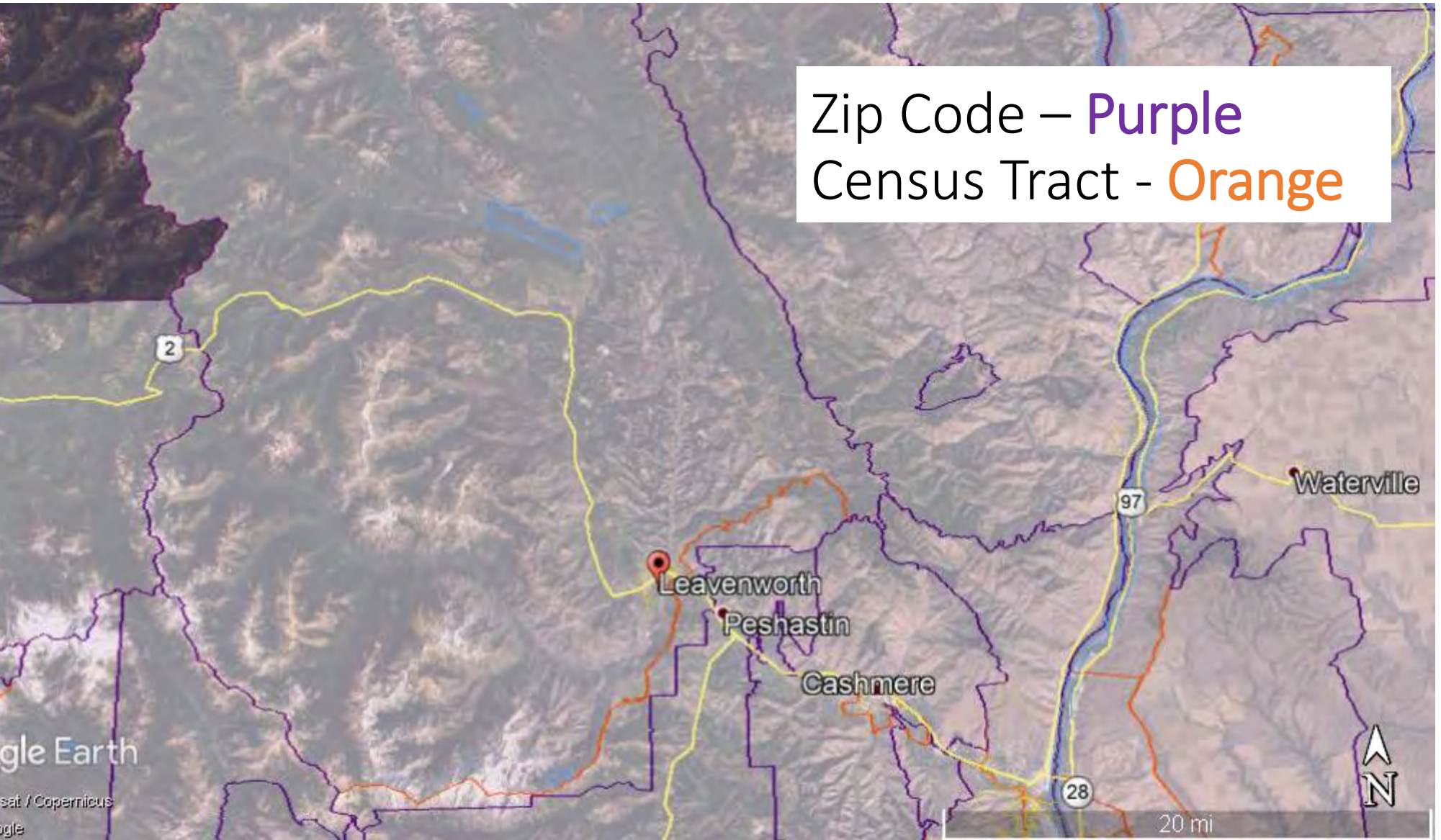
- Short-term Rentals (est. 1,200 active)
- ZIP Code Boundaries

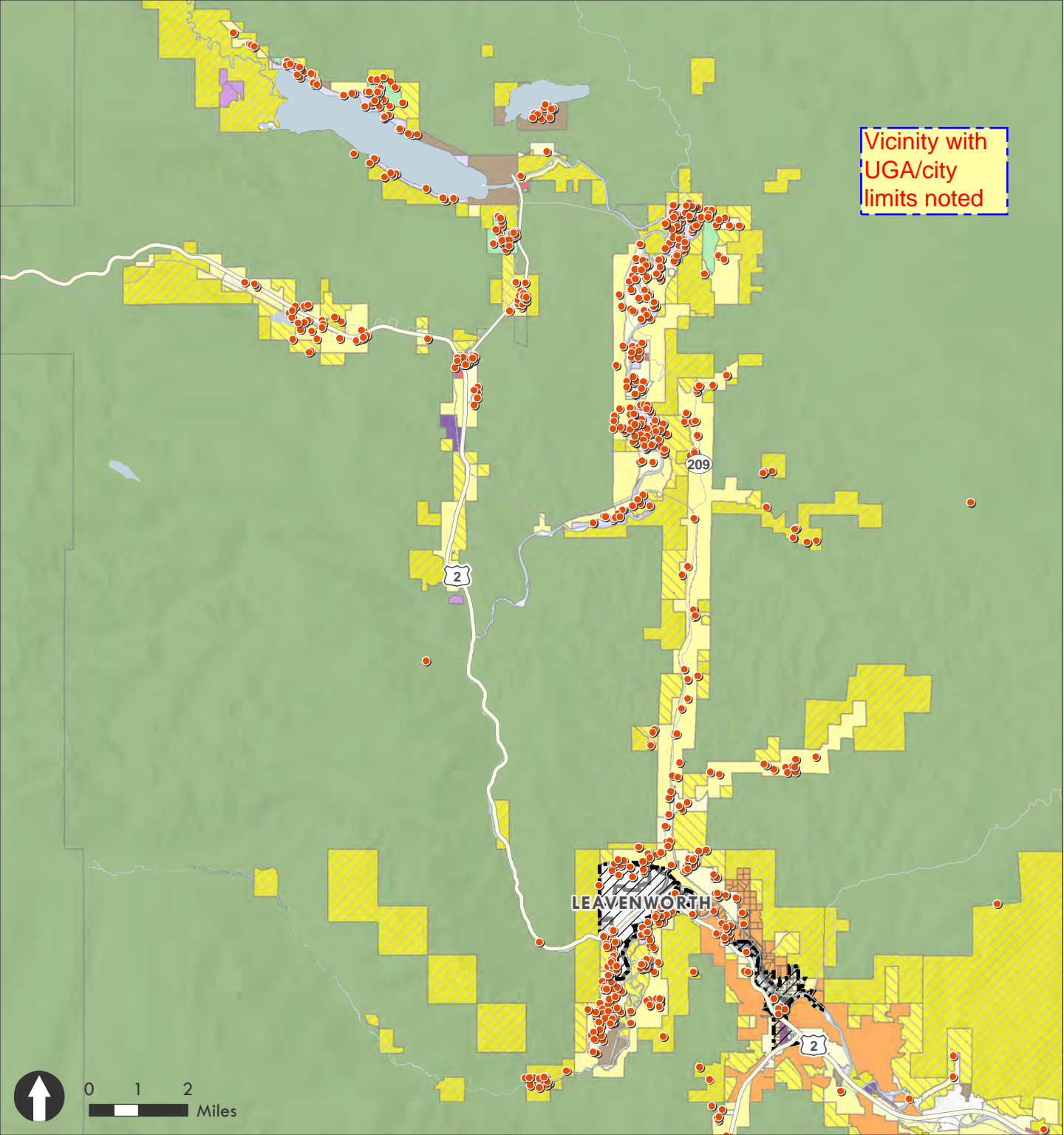


Source: AirDNA, 2020.

Data notes: This data tracks individual short-term rental property level from AirBNB and HomeAway. The location data on individual properties is within 500 meters of accuracy. It shows only properties that are assumed to be in unincorporated areas and are listed as an entire home/apartment.

Zip Code – Purple
Census Tract - Orange





Vicinity with
UGA/city
limits noted

LEGEND

Urban Growth Areas
Short-term Rental

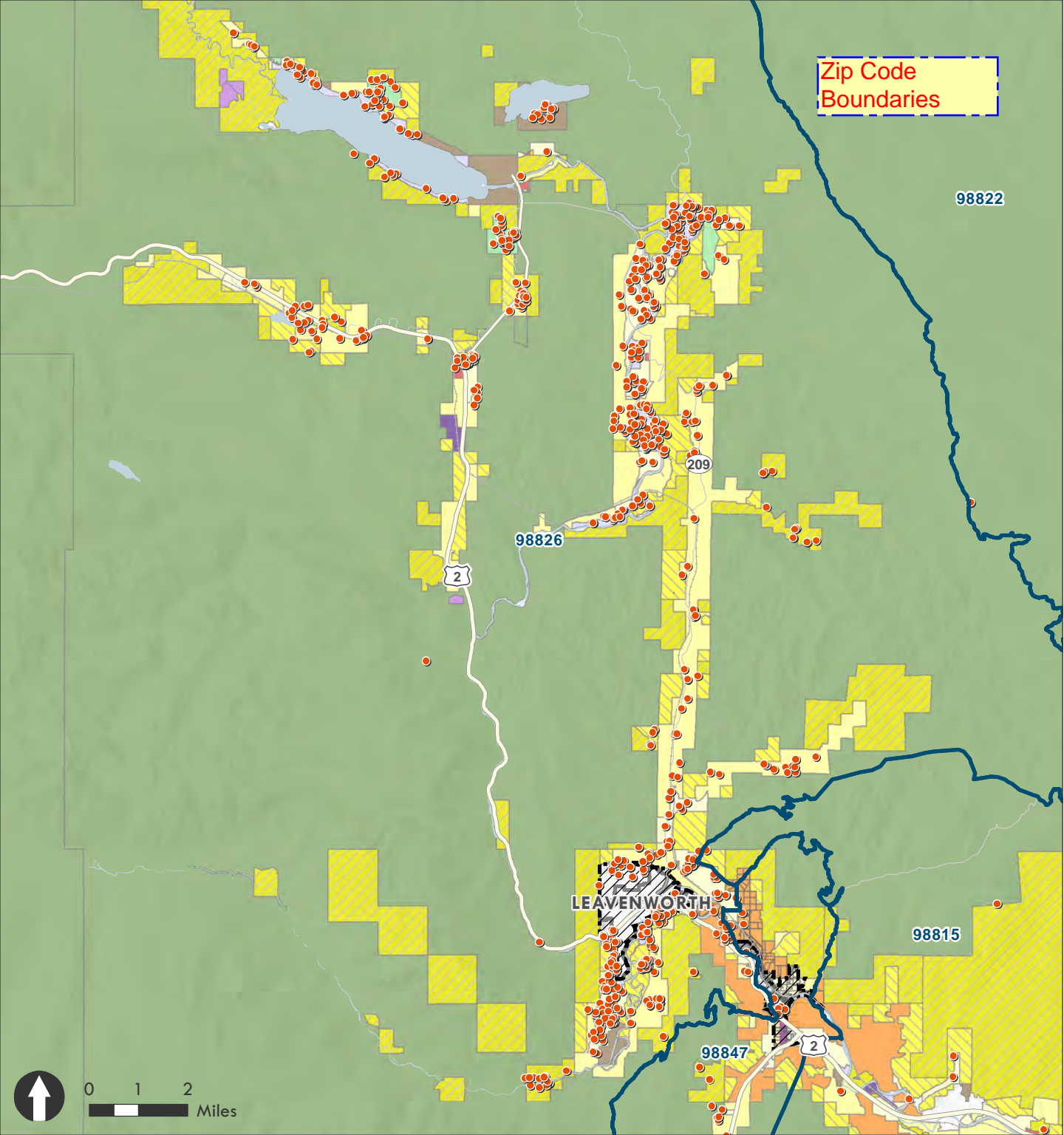
Chelan County Zoning

AC - Commercial Agricultural Lands
FC - Commercial Forest Lands
MC - Commercial Minerals Lands
RC - Rural Commercial
RI - Rural Industrial
RP - Rural Public
RR2.5 - Rural Residential/Resource 2.5
RR5 - Rural Residential/Resource 5

RR10 - Rural Residential/Resource 10
RR20 - Rural Residential/Resource 20
RRR - Rural Recreational/Residential
RV - Rural Village
RW - Rural Waterfront
WAPATO - Tribal Lands - not zoned
CD - Downtown Commercial
CH - Highway Commercial
CT - Tourist Commercial
I - Industrial
IC - Campus Industrial
MLI - Manson Light Industrial
PU - Public
R1 - Low Density Residential
R2 - Med Density Residential
R3 - High Density Residential
UP - Urban Public
UR1 - Urban Residential 1
UR2 - Urban Residential 2
UR3 - Urban Residential 3

BERK
Map Date: April 2020

Source: AirDNA, 2020.
Data notes: This data tracks individual short-term rental property level from AirBNB and HomeAway. The location data on individual properties is within 500 meters of accuracy. It shows only properties that are assumed to be in unincorporated areas and are listed as an entire home/apartment.



Zip Code
Boundaries

98822

98826

98815

98847

LEAVENWORTH

LEGEND

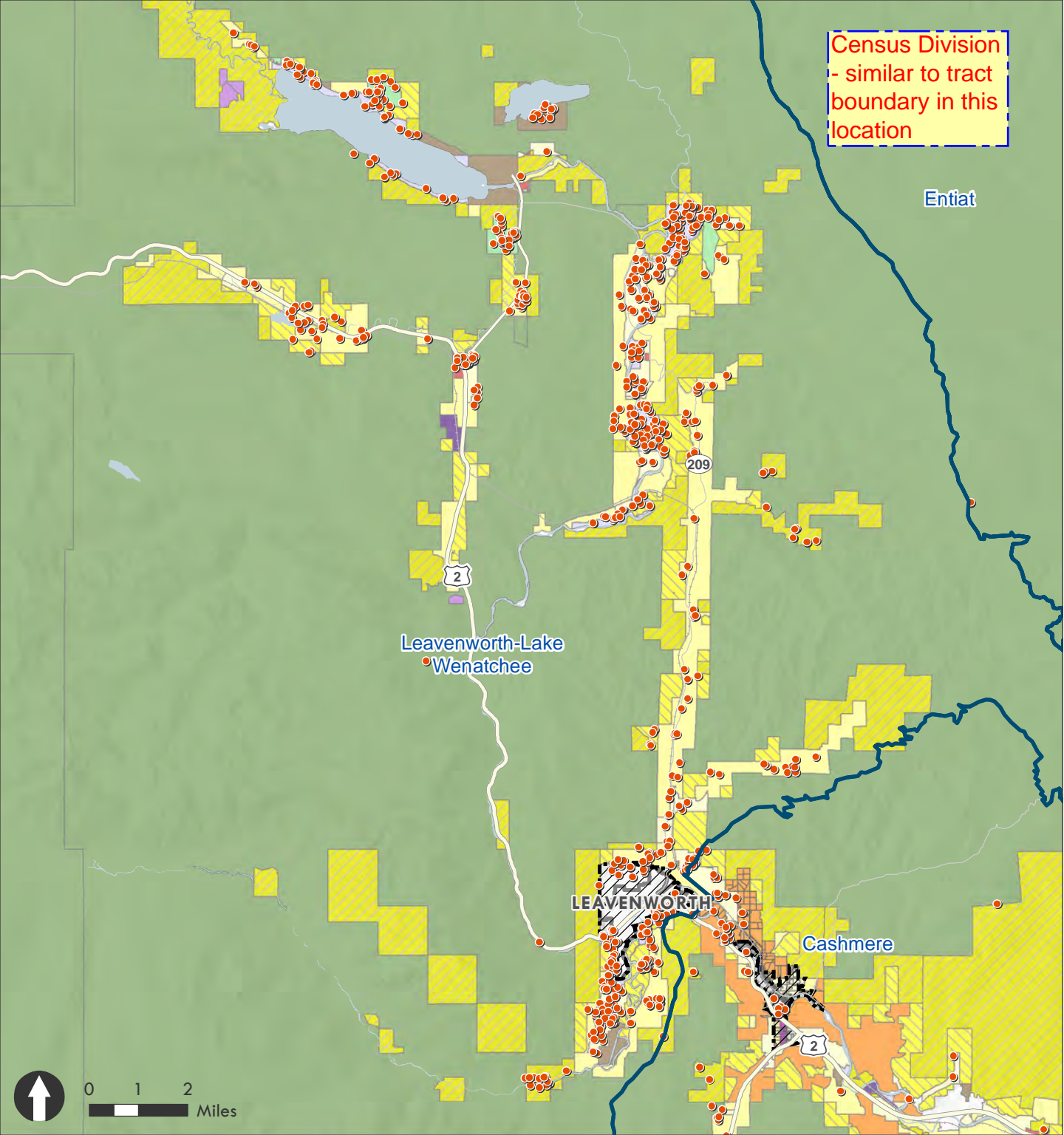
- Zip Code Boundaries
- Urban Growth Areas
- Short-term Rental

Chelan County Zoning

- | | | |
|--|--|---|
| AC - Commercial Agricultural Lands | RR5 - Rural Residential/Resource 5 | IC - Campus Industrial |
| FC - Commercial Forest Lands | RR10 - Rural Residential/Resource 10 | MLI - Manson Light Industrial |
| MC - Commercial Minerals Lands | RR20 - Rural Residential/Resource 20 | PU - Public |
| RC - Rural Commercial | RRR - Rural Recreational/Residential | R1 - Low Density Residential |
| RI - Rural Industrial | RV - Rural Village | R2 - Med Density Residential |
| RP - Rural Public | RW - Rural Waterfront | R3 - High Density Residential |
| RR2.5 - Rural Residential/Resource 2.5 | WAPATO - Tribal Lands - not zoned | UP - Urban Public |
| | CD - Downtown Commercial | UR1 - Urban Residential 1 |
| | CH - Highway Commercial | UR2 - Urban Residential 2 |
| | CT - Tourist Commercial | UR3 - Urban Residential 3 |
| | I - Industrial | |

BERK
Map Date: April 2020

Source: AirDNA, 2020.
Data notes: This data tracks individual short-term rental property level from AirBNB and HomeAway. The location data on individual properties is within 500 meters of accuracy. It shows only properties that are assumed to be in unincorporated areas and are listed as an entire home/apartment.



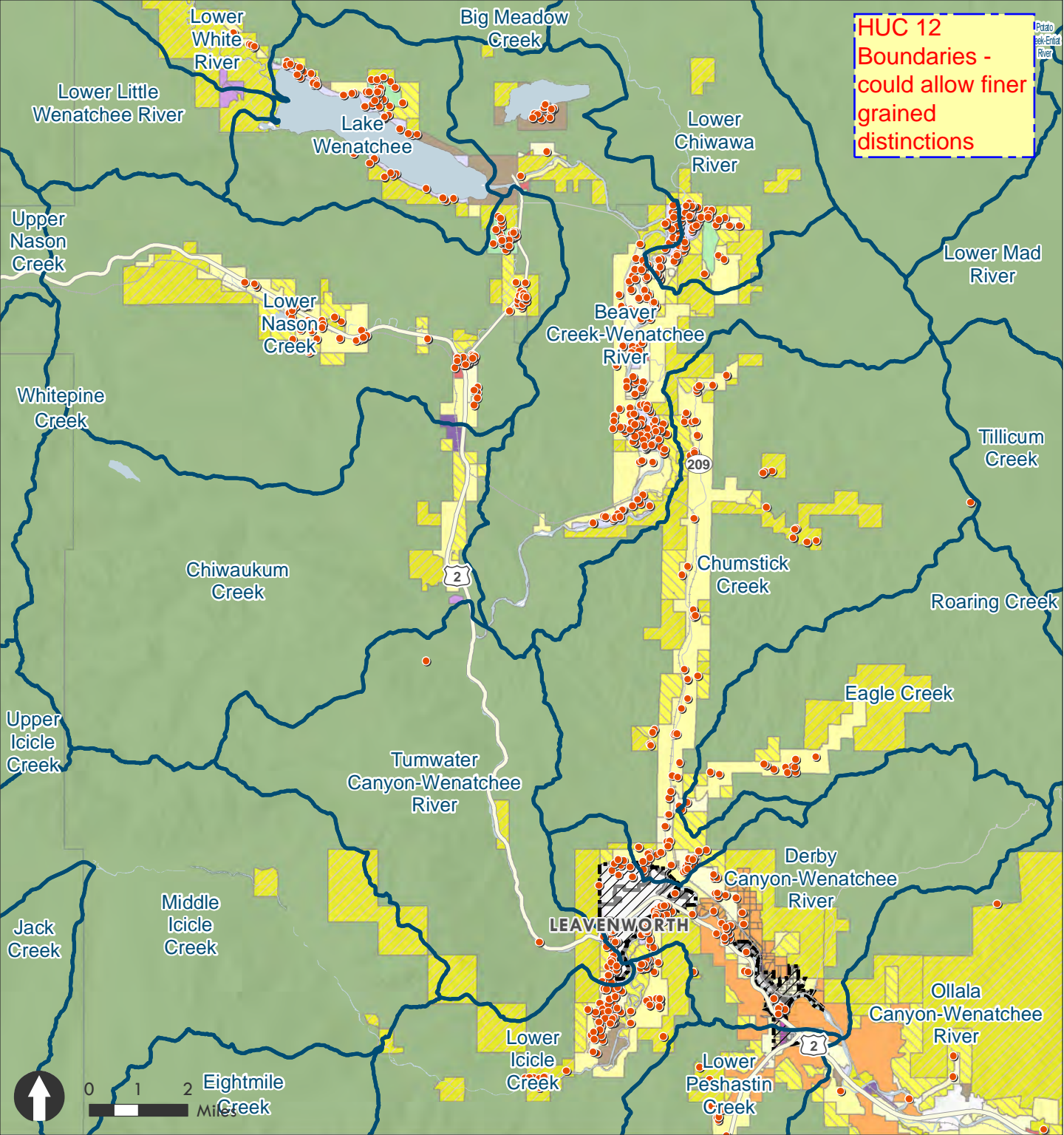
LEGEND

- | | | |
|--|--------------------------------------|-------------------------------|
| Census County Division | RR5 - Rural Residential/Resource 5 | IC - Campus Industrial |
| Urban Growth Areas | RR10 - Rural Residential/Resource 10 | MLI - Manson Light Industrial |
| Short-term Rental | RR20 - Rural Residential/Resource 20 | PU - Public |
| Chelan County Zoning | RRR - Rural Recreational/Residential | R1 - Low Density Residential |
| AC - Commercial Agricultural Lands | RV - Rural Village | R2 - Med Density Residential |
| FC - Commercial Forest Lands | RW - Rural Waterfront | R3 - High Density Residential |
| MC - Commercial Minerals Lands | WAPATO - Tribal Lands - not zoned | UP - Urban Public |
| RC - Rural Commercial | CD - Downtown Commercial | UR1 - Urban Residential 1 |
| RI - Rural Industrial | CH - Highway Commercial | UR2 - Urban Residential 2 |
| RP - Rural Public | CT - Tourist Commercial | UR3 - Urban Residential 3 |
| RR2.5 - Rural Residential/Resource 2.5 | I - Industrial | |



Source: AirDNA, 2020.

Data notes: This data tracks individual short-term rental property level from AirBNB and HomeAway. The location data on individual properties is within 500 meters of accuracy. It shows only properties that are assumed to be in unincorporated areas and are listed as an entire home/apartment.



LEGEND

- | | | |
|--|--------------------------------------|-------------------------------|
| Hydrologic Cataloging Unit | RR5 - Rural Residential/Resource 5 | IC - Campus Industrial |
| Urban Growth Areas | RR10 - Rural Residential/Resource 10 | MLI - Manson Light Industrial |
| Short-term Rental | RR20 - Rural Residential/Resource 20 | PU - Public |
| Chelan County Zoning | RV - Rural Village | R1 - Low Density Residential |
| AC - Commercial Agricultural Lands | RW - Rural Waterfront | R2 - Med Density Residential |
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From: Bob Bugert
Sent: Wednesday, April 1, 2020 9:12 AM
To: kirvil@comcast.net
Cc: Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>
Subject: RE: more information on density

Kirvil—

Thank you for providing these comments. We will add these as part of the record and in the Commission's deliberations on how to handle the density issue.
I appreciated your participation in yesterday's work session.

Bob Bugert
Chelan County Commissioner, District 2
Office: 509-667-6215
Mobile: 509-630-4480

From: kirvil@comcast.net <kirvil@comcast.net>
Sent: Tuesday, March 31, 2020 5:43 PM
To: Bob Bugert <Bob.Bugert@CO.CHELAN.WA.US>
Cc: Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>
Subject: more information on density

External Email Warning! This email originated from outside of Chelan County.

Hi Bob,

After this morning's call, I emailed Deanna Walter to see if she could give me the number of single family residences in the 98826 zip code. She responded quickly.
There are 4733 properties with single family residences in our 98826 zip code. According to the information we received this morning from Berk, there are 868 short term rentals in this zip code. Some of these may be on lots with a full time owner on site and it is the accessory dwelling unit that is rented. But, this data does give us a perspective on the density of STRs we are dealing with.

Assuming the BOCC decides to adopt a 5% density limit for the heavily impacted zip codes, we may need to look at the following three provisions: 1) an immediate moratorium on new STRs in the heavily impacted areas of the county, 2) a provision that does not allow STR permits to pass to new owners when the property is sold, and 3) a goal to get down to a limit that only 5% of the single family housing stock in a geographic unit can be allowed to have permits for short term rentals. When you get the number down to below 5%, then new permits could be issued up to this limit. (I am assuming you are going to allow all the existing STRs to get permits as long as they meet the standards in the new ordinance so it will take years to get down to the 5% cap on density.)

Kirvil

From: kirvil@comcast.net <kirvil@comcast.net>
Sent: Friday, April 3, 2020 10:29 AM
To: Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>
Subject: questions

External Email Warning! This email originated from outside of Chelan County.

Hi Kirsten,

I am part of the Leavenworth/Plain/Lake Wenatchee residents' group that is tracking and commenting on the development of the STR ordinance. Our group is expanding to include residents from Peshastin and Manson as we all seem to share similar views on the essential elements of the ordinance.

The Berk presentation on Tuesday was very helpful. Is it possible to get some more information from Lisa?

For example, our group believes that density of units must be managed. We think regulation by zip code makes sense but we are interested in whether Lisa think that is the best geographic unit. We also think there should be a 5% cap on the number of entire house rentals in relation to the total number of single family homes in the geographic unit. It is clear from the data in the Berk reports that the Leavenworth, Manson and maybe the Peshastin zip codes are over this benchmark already. How have other jurisdictions that have put caps on density managed to get down to the amount of STRs allowed when the current number is over the limit? It makes no sense to us to allow a 1% growth rate when we have too many to start with in certain parts of the county.

Finally, is April 10th the date that the draft ordinance will be released? Will you put it on your website immediately?

Thanks for your assistance.

Kirvil Skinnarland

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Subject: questions

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Kirvil Skinnarland

From: Stan Winters <winterss1@me.com>
Sent: Friday, April 3, 2020 2:24 PM
To: Lisa Grueter
Cc: Ortiz Tricia
Subject: Chelan CO Short Term Rental Issue Feedback
Attachments: Simulacrum.docx; Inside Airbnb_One scary article.docx; Web Stories about STRs.docx

Hi Lisa,

We (Peshastin Community Council) had a phone meeting with you a few weeks ago... thank you for spending that time with us.

If you are still accepting input I feel compelled to add my voice.

I am attaching a few documents here that I hope you will spend a few minutes with. As Chelan County had been moving toward resolution on issues around Short-Term-Rentals an observation is that there is urgency to get something completed. But I'm nervous that the decisions we seem to be heading for won't solve the issues that will be created. The reason I'm feeling this is because I don't hear about or sense a larger goal for our communities and for Chelan County. We can make regulations and pick around the edges of these issues, but if you read the attached papers you will see that you can not and will not win against the Short-Term-Rental, AirBnB industry. They will transform our communities into something we probably don't want. Here is a quote from one of the websites included:

* “Airbnb describes itself as a quaint little home-sharing service ... but the reality is that it has grown to be a corporate entity that makes millions of dollars from businesses taking advantage of loopholes and running de facto hotels,” she says. The attached documents, which are just excerpts from websites, show that regulation of Short-Term-Rentals is all but impossible, and any alleged advantages that they bring to a community are in fact either not actual advantages (like saying they bring in more tourists - they don't), or the costs they impose on a community exceed the benefits, which are usually accrued by an absentee owner.

1. Web Stories about STRs: This includes several stories; one that shows the effects of the Corona Virus on STRs. All of a sudden there is a glut of housing available in places that have been experiencing shortages; rising costs of housing where STRs are present; wealth and racial inequity in the STR business - higher wealth and white households take a disproportionate share of wealth from non-primary residences at the expense of low income and non-white residents; and the conclusion that AirBnB is clearly a business and should have to play by the same rules as other lodging providers.

2. Inside AirBnB_One Scary Story: Read this to see what Chelan County will be up against. There are many quotes that are worthy, but here is one that should scare us all:

Airbnb is engaged in “a city-by-city, block-by-block guerrilla war” against local governments. Our fate, if we allow STRs, is constant litigation by extremely well-funded organizations.

3. Simulacrum: I had to look this one up, so I'll define it here: an unsatisfactory imitation or substitute, "a bland simulacrum of American soul music". That's is what communities become when they are overrun by

Short Term Rentals. Chelan isn't Chelan anymore... it's pretend Chelan. Leavenworth (already a "fake" Bavarian town) becomes a fake of a fake. A key statement is: it is argued that STRs provides an economic equalizer, helping even hosts of few means to boost incomes and manage otherwise affordable housing costs. Yet a growing army of critics allege that, in dozens of cities around the world, the proxy hotel service more often does the opposite, hyper-accelerating affordable housing crises and gentrification patterns that force out residents. And in Toronto, the platform has eliminated some 6,500 homes from the cities badly pinched housing market.

The route we are trying to pursue in Peshastin is to classify whole house short term rentals in the same group as all other similar lodging. The wording will be something like this: "Hotels/Motels/Lodging Facilities": definition "Lodging Facility: A building, group of buildings or a portion of a building which is designed for or occupied as the temporary abiding place of individuals for less than thirty (30) consecutive days, including, but not limited to establishments held out to the public as auto courts, hostels, inns, motels, motor lodges, time share projects, tourist courts, guest inns, nightly rentals, vacation rentals, and other similar uses."

This way we can apply our current zoning. Whole house overnight rentals are subject to the same rules as all other similar lodging. Why should they get preferential treatment? This keeps the whole house STRs out of the residential areas, which is exactly where the problems are. And this makes all of the problems with this issue go away. If we don't go this route and think we will be successful with regulations... the articles I've attached speak to that... we will have to deal with issues forever and we'll eventually lose every issue. That industry will stop at nothing.

Before we adopt regulations I think we should back up and start with a shared vision of what we want Chelan County to look like as we move forward. I would much rather takes some steps back to consider our long-range goals and vision for the future of our valley. Then we can create regulations that will help get us there.

Thank you for listening.

Stan

Stan and Vania Winters
8200 Riverview Rd
Peshastin, WA 98847
509 293-0457

Inside Airbnb's 'Guerrilla War' Against Local Governments

The high-profile unicorn is battling cities from Boston to San Diego over collecting taxes and enforcing zoning rules.

"Airbnb describes itself as a quaint little home-sharing service ... but the reality is that it has grown to be a corporate entity that makes millions of dollars from businesses taking advantage of loopholes and running de facto hotels," she says.

"READ MY LIPS: We want to pay taxes," Chris Lehane, Airbnb's global head of public policy, told the nation's mayors in 2016. In the years since, the home-sharing site has repeated the declaration in press releases, op-eds, emails, and on billboards. On its website, Airbnb says it is "democratizing revenue by generating tens of millions of new tax dollars for governments all over the world."

Palm Beach County tax collector Anne Gannon wasn't surprised. "We knew we were going to get sued," she says. "That's what they do all over the country. It's their mode of operation."

But when Palm Beach County, Florida, a popular tourist destination, passed an ordinance in October 2018 requiring Airbnb and other short-term rental companies to collect and pay the county's 6 percent occupancy tax on visits arranged through their sites, Airbnb sued.

Palm Beach County tax collector Anne Gannon wasn't surprised. "We knew we were going to get sued," she says. "That's what they do all over the country. It's their mode of

operation."

Gannon has been cajoling, threatening, and ordering Airbnb to collect taxes for its hosts since 2014. Five years, three lawsuits, and millions in unpaid occupancy taxes later, she's still trying. "All we want them to do is pay their taxes," she says. "They absolutely don't want to pay their taxes the way we want to collect them. That's the bottom line."

Similar dramas are playing out around the country. From Nashville to New Orleans to Honolulu, Airbnb is battling local officials over requests to collect occupancy taxes and ensure that the properties listed on its site comply with zoning and safety rules. In the past five months alone, the company has spent

more than half a million dollars to overturn regulations in San Diego and has sued Boston, Miami, and Palm Beach County over local ordinances that require Airbnb to collect taxes or remove illegal listings. Elsewhere, ***Airbnb has fought city officials over regulations aimed at preventing homes from being transformed into de facto hotels and requests from tax authorities for more specific data about hosts and visits.***

Airbnb is engaged in “a city-by-city, block-by-block guerrilla war” against local governments, says Ulrik Binzer, CEO of Host Compliance, which helps cities draft and enforce rules for short-term rentals, sometimes putting it at odds with hosting platforms. “They need to essentially fight every one of these battles like it is the most important battle they have.”

Founded in 2008 as an early champion of the sharing economy by allowing people to rent homes, apartments, and rooms to others, Airbnb has grown into a lodging colossus, offering more than 6 million places to stay in more than 191 countries. ***Its listings outnumber those of the top six hotel chains combined,*** helping the company reportedly generate more than \$1 billion in revenue in the third quarter of 2018. It is valued by investors at \$31 billion, making it the country’s second most valuable startup, after Uber. By comparison, Hilton and Marriott’s current market capitalizations are \$25 billion and \$43 billion, respectively. Earlier this month, Airbnb acquired last-minute hotel booking service HotelTonight, reportedly for more than \$400 million.

Airbnb is engaged in “a city-by-city, block-by-block guerrilla war” against local governments.

One reason Airbnb is often a cheap option for travelers: Running a hotel or bed and breakfast is expensive; snapping photos of your home, apartment, or spare room and filling out an online profile is not. Hotels must comply with a litany of health, safety, and zoning rules—as well as register with local agencies and agree to collect certain taxes—before they can book a single guest.

Airbnb maintains that, in some cases, it’s not permitted to collect occupancy taxes required of hotels and other lodgings; it’s also not responsible for ensuring the rooms and homes listed on its sites comply with zoning or health regulations. The company says it follows local and state laws but considers itself a “platform,” serving merely to connect hosts and visitors, rather than a lodging provider—more akin to Facebook than Marriott.

The onus is on hosts, Airbnb argues, to collect and pay any relevant taxes and to comply with other regulations. In practice, though, few actually do—at least not without considerable effort by local authorities—according to interviews with more than a dozen local government officials and advisers.

Some officials agree with Airbnb. In an early 2018 survey of state tax departments by Bloomberg, officials in 25 states said it was the host's responsibility to pay occupancy tax for an Airbnb stay. Officials in 14 states said they consider it the responsibility of Airbnb or other short-term rental operators. The survey was taken before the US Supreme Court ruled in June that states may collect sales tax from online retailers even when they don't have a physical presence in that state. The survey did not include local authorities, who are often more reliant on revenue from occupancy taxes, especially in popular tourist areas.

To be sure, these aren't Airbnb's taxes, any more than Hilton "pays" taxes for its guests' hotel stays. Rather, the officials sparring with Airbnb want the company to collect and forward the taxes from guests, much as hotels do. Airbnb says it isn't required to collect the taxes in many places; early on, it largely didn't.

That changed around 2014, when Airbnb began striking deals with officials in select cities to collect and deliver taxes from its hosts. It calls these Voluntary Collection Agreements, or VCAs. In Portland, site of the first agreement, city officials legalized home-sharing and lowered the registration fee for short-term rentals around the same time Airbnb agreed to add a 11.5 percent occupancy tax on each booking. It later negotiated similar deals in San Francisco, Chicago, Philadelphia, Washington, DC, and elsewhere. The company says it has signed more than 350 such agreements nationwide and more than 500 around the world, and has collected more than \$1 billion in taxes.

"Some governments have rules requiring platforms like Airbnb to collect and remit taxes, and we make every attempt to comply with these obligations," says Christopher Nulty, Airbnb's head of public policy. "However, many governments do not have such rules and so Airbnb has proactively established more than 500 voluntary collection agreements globally to ensure our community is paying their fair share of taxes. We are eager to do everything we can to ensure we are paying our fair share and willing to work with any government that will work with us."

However, those agreements don't require hosts to meet other zoning, health, and safety rules, and they prohibit cities from attempting to collect back taxes. Some also create obstacles for local agencies to identify and police hosts who list through the site. Dan Bucks, former director of the Montana Department of Revenue and former executive director of the US Multistate Tax Commission, analyzed some of the few publicly available Airbnb agreements and found that most prevented city officials from learning the names or addresses of Airbnb hosts, making it impossible for officials to enforce local codes. Bucks says the agreements helped Airbnb grow by "providing a shield of secrecy" to hosts. His study was partially funded by the American Hotel and Lodging Association, which is often at odds with Airbnb and other short-term rental companies.

"All we want them to do is pay their taxes."

ANNE GANNON, PALM BEACH COUNTY TAX COLLECTOR

Airbnb says its VCAs are designed to help government agencies collect tax revenue, not to help them enforce other laws related to short-term rentals. The company says the agreements show that it is a responsible corporate citizen.

Historically, other online rental services, such as Booking.com, HomeAway, and VRBO, have not collected these taxes in many places. In the past two years, HomeAway and VRBO have begun collecting some occupancy taxes in a handful of areas—sometimes using their own version of a VCA. Booking.com does not offer any occupancy-tax collection services, compounding the revenue drain for municipalities. Booking.com's global communications manager, Kim Soward, says the company pays all required taxes. Expedia Group—owner of HomeAway, VRBO, VacationRentals, and other sites—did not respond to multiple requests for comment.

Airbnb is the undeniable giant of the field, and is reportedly preparing for an initial public offering. About 51 percent of all short-term rental listings in the US are on Airbnb, according to an analysis by Binzer, of Host Compliance. VRBO controls 17 percent of listings and HomeAway 11 percent, he says.

Poster Child

New Orleans was hailed as the poster child for Airbnb's work with local governments after signing a VCA in December 2016. Around the same time, the city struck a deal with Airbnb to legalize short-term rentals while requesting that the company share the names and addresses of hosts, ban certain illegal

listings, and create an online system that automatically registers hosts with the city, among other things. Many viewed the deal as a sign Airbnb was learning to live with local taxes and regulations.

Today, city officials say they're disappointed. They say a surge in short-term rentals has exacerbated New Orleans' affordable housing crunch and turned entire residential blocks into de facto hotels. Jane's Place Neighborhood Sustainability Initiative, a local housing group, says there were 4,319 whole-unit Airbnb listings in the city last year, more than double the 1,764 in 2015. The group found that 11 percent of operators, including many from outside Louisiana, control 42 percent of the city's short-term rentals.

The largest operator, a company called Sonder, has 197 short-term rental permits. Nearly 80 percent of Sonder's listings are booked through platforms like Airbnb, according to Sonder's director of communications, Mason Harrison. "That's a different story than the mom-and-pop" narrative that Airbnb often uses to describe its hosts, says New Orleans councilmember Kristin Gisleson Palmer.

Today, city officials (New Orleans) say they're disappointed. They say a surge in short-term rentals has exacerbated New Orleans' affordable housing crunch and turned entire residential blocks into de facto hotels.

City officials say the registration system Airbnb launched in April 2017 didn't give them some data they had requested, such as the identity of the property owner or tenant, the number of bedrooms in the property, and contact information for the property manager. To collect the missing data, city staffers say they had to contact 4,786 applicants over three months. "We could not really effectively use [the data provided] for enforcement and holding folks accountable," Palmer says.

In May 2018, the city council imposed a nine-month freeze in some areas on new permits for renting a home without an owner present. The following month, Airbnb disabled the registration system—including another enforcement-enabling feature, which displayed hosts' license numbers on their Airbnb listings.

A February 15 report by the city's Department of Safety and Permits, obtained by WIRED, states that disabling the registration system caused a year of work by city officials tracking short-term rentals to

“disappear overnight.” ***The report concludes that Airbnb and other short-term rental companies had engaged in “deliberate data obfuscation, refusal to provide the required data, and a total failure of cooperation with any enforcement mechanisms pursued by the City.”*** The report notes that Airbnb continues to collect and remit occupancy taxes for its listings in the city.

Airbnb says city officials’ description of events is “inaccurate,” and that it is supplying all the information that is required. The company says there were “initial bumps in the road that Airbnb was working with the city to address, only to have lawmakers abruptly change the rules in May 2018.” Those changes, the company says, made the registration system ineffective.

“Housing affordability is a challenge in New Orleans—in fact 70 percent of our host community have said they rely on the income they make to stay in their homes,” Airbnb says. The company says it is committed to working with officials to resolve any concerns.

A February report by the New Orleans Department of Safety and Permits is critical of short-term rental companies.

Blocking New Laws

Airbnb says it complies with laws that require it to collect and pay taxes for hosts. But it has also worked to forestall such laws—even seeking at times to strip cities of authority over short-term rentals. That’s what happened in Nashville in late 2017 and early 2018.

As the city inched closer to prohibiting so-called **“mini hotels”**—non-owner-occupied homes used exclusively as vacation rentals—Airbnb shifted its focus from City Hall to the state Capitol three blocks away. In the latter half of 2017, the **company more than doubled the number of lobbyists** it employed in Tennessee, to from four to 11, and spent between \$225,000 and \$350,000 on lobbying between February 2017 and August 2018, according to reports the company filed with the state.

In January 2018, the Tennessee Department of Revenue signed a VCA with Airbnb. The agreement requires Airbnb to collect and pay the 7 percent state sales tax on its bookings, but does not cover the 5 percent occupancy tax in Nashville, by far its largest market in the state. A few days later, Nashville **passed its ordinance** prohibiting mini hotels.

Around this time, a political action committee called the Committee to Expand Middle Class By Airbnb, Inc. donated \$10,000 to groups representing Tennessee Republicans, according to campaign finance records. The donations included \$2,500 to the campaign of state representative Cameron Sexton, who had introduced a bill in 2017 specifying that short-term rentals should not be considered hotels under state law. The bill, known as the Short-Term Rental Unit Act, was drafted in consultation with Airbnb and other short-term rental companies, including HomeAway, according to the *Tennessean*. It included a provision stripping cities of the power to ban existing short-term rentals. The Tennessee General Assembly passed the bill in April 2018.

Local activists say the law cripples cities' ability to tackle an important local issue. "The Tennessee state Legislature and Tennessee's governor decided to severely weaken the basic protections for the health, safety, and well-being of Nashvillians that were created by our local government," John Stern, president of the Nashville Neighborhood Alliance, a residents' group, says via email.

Airbnb says the Tennessee law was the work of "state lawmakers who care deeply about this issue and worked to organize a broad coalition of supporters—including the business, technology, property rights, and home sharing communities." Sexton did not return a request for comment.

Similar scenarios have unfolded elsewhere after cities have moved to restrict short-term rentals. *In February 2016, the Austin City Council voted to phase out mini hotels in residential areas by 2022.* In the following months, several other Texas cities passed similar restrictions. Then, early in 2017, Texas state lawmakers introduced two bills in the legislature preventing municipalities from banning short-term rentals and enforcing many regulations.

A few months later, in April 2017, Airbnb announced that it had signed a VCA with Texas officials to collect state occupancy taxes. Bennett Sandlin, executive director of the Texas Municipal League, which represents cities, called the deal "a smokescreen to cover the company's refusal to pay taxes." The 2017 bills eventually stalled in the Texas legislature, but lawmakers plan to try again this year.

Airbnb says it has "excellent working relationships" with many Texas cities and hopes to extend the VCA with the state to "new tax agreements with Texas municipalities to help them collect new revenue from home sharing."

Where's the Money?

Gannon, the Palm Beach tax collector, has been tilting at travel companies for a decade. In 2009, she sued Expedia, Orbitz, Priceline, and Travelocity for failing to collect and pay occupancy taxes on the full cost of the hotel rooms they were selling; three years later, the companies settled the suit and agreed to pay nearly \$2 million in back taxes.

She then turned to the online home-rental companies. In 2014, she sued Airbnb, HomeAway, and TripAdvisor, alleging they should be classified as “dealers” renting accommodations under Florida law, and thus required to collect occupancy taxes on behalf of their hosts. In January, after five years, a judge ruled that the services were not dealers under Florida law and did not have to collect the taxes for hosts. Gannon is appealing the ruling.

In 2015, the Florida Department of Revenue signed a VCA authorizing Airbnb to collect and remit the 6 percent sales tax for all listings in the state, plus local sales and occupancy taxes for some counties.

Soon after, Gannon asked to see the details of the agreement; state officials told her it was confidential. So she sued the Florida Department of Revenue, alleging that the agency’s secrecy violated the state’s public records law. A few hours later, the department faxed a copy of its Airbnb VCA to Gannon’s office; she says she was instructed not to share it with anyone. It required Airbnb to provide the state only with aggregate data and allowed the company to withhold “any personally identifiable information” about hosts or guests. Most other VCAs signed with state or local governments contain identical language.

Officials say such details about hosts and their rentals are crucial to enforcing local laws and ensuring the lump sum tax payments match up with detailed data on stays. Shielding names and other details from tax officials “is a gross departure from standard practice,” says Bucks, the former tax commissioner.

“We’re the middle—the hosts are stuck in the middle.”

MARIA VALE, AIRBNB HOST IN PALM BEACH COUNTY, FLORIDA

In New Orleans, the February report by the city’s Department of Safety and Permits says Airbnb provided officials there with anonymous account numbers in place of addresses or taxpayer identifiers, making it difficult for the city to audit the information. “It is impossible to track whether we are getting

all the money that we are supposed to get,” says Andrew Sullivan, chief of staff for Palmer, the New Orleans councilmember.

Airbnb disagrees. “Airbnb provides the necessary information to ensure tax payments are accurate, including number of nights, charges, and the amount of tax collected,” Nulty says. He says the company welcomes audits; however, many of the company’s VCAs prohibit cities from auditing Airbnb more than once every two years.

Airbnb's 2016 VCA with Sonoma County, California.

A Public Clash

Palm Beach County’s monthly commissioners meeting is typically a dull affair. But October 16, 2018, was different.

The chambers were packed with people dressed in white, holding hot pink flyers. The reason: Gannon’s proposal to amend the county’s Tourist Development Ordinance to require platforms such as Airbnb to collect and remit occupancy taxes on behalf of hosts, and to share more data with the county.

A few weeks earlier, emails from Airbnb had arrived in the inboxes of its hosts in the county. “Home-sharing in Palm Beach County is under attack,” many declared in bold letters, asserting that Gannon had proposed an “unfriendly” ordinance that would make hosts’ lives more difficult. The emails implored hosts to attend the hearing and “use your voice to oppose this proposal and share the benefits” of home sharing.

Around 100 hosts attended the meeting. But Gannon was prepared. Having seen several of the emails, she assembled a three-page document rebutting what she calls Airbnb’s “campaign of misinformation,” line by line. The packet was printed on hot pink paper and given to each person who walked through the door.

During the meeting, some hosts expressed doubts about Airbnb’s position. Some recalled seeing a message from Airbnb stating that it was collecting and remitting taxes on their rentals, though the company was not. “I have this underlying fear ... that I am breaking a law that I don’t really know about,” said Ruth Riegelhaupt-Herzig, an Airbnb host since 2015.

“We thought Airbnb took care of everything, and I was a little scared I was in trouble with the government,” host Maria Vale said at the meeting. “All I’m saying is we’re the middle—the hosts are stuck in the middle.”

Nulty says that Airbnb makes it clear to hosts which taxes it collects via [this webpage](#), which lists areas with VCAs and what taxes they cover. The page does not explain which taxes hosts are required to collect on their own. A [different Airbnb page](#) instructs hosts to tell guests to bring extra money when checking in so the host can collect taxes in person. Riegelhaupt-Herzig says that isn’t effective, as most guests are wary of paying an additional 6 or 10 percent directly to the host, in addition to the booking charges they paid online through Airbnb.

What’s more, all stays booked in the area have a charge labeled “Occupancy Taxes and Fees” added to the final bill, because of the state’s VCA. “So for us to turn around and say, ‘I’m sorry, you haven’t paid the occupancy tax in Palm Beach County,’ they think we’re scamming them,” which isn’t good for a reviews-based business, Riegelhaupt-Herzig told WIRED. She says she has been paying the county occupancy tax since October out of her own pocket.

After more than an hour of testimony, commissioner Dave Kerner said Airbnb had allowed its hosts to “be misled” about paying taxes. “That is concerning,” Palm Beach County mayor Melissa McKinlay said. “And so I will support this ordinance today.” It was approved unanimously seconds later.

In San Diego last year, Airbnb took a different tack to counter a new law. City officials had signed a VCA with Airbnb in 2015. But they grew unhappy with the setup’s lack of transparency and the inability to audit, says San Diego councilmember Barbara Bry. What’s more, Airbnb use had skyrocketed in San Diego since then. In March 2015, there were more than 2,600 rental units listed on short-term rental sites in San Diego, according to Host Compliance; by 2019, that total had soared to more than 11,500. Host Compliance says two-thirds of short-term rentals in San Diego are posted on Airbnb. Bry says that the rise of full-time investor-owned short-term rentals in residential areas has hurt enrollment in public schools, transformed neighborhoods into districts of mini hotels, and contributed to a citywide housing shortage.

Last August, the San Diego City Council passed an [ordinance](#) that banned the short-term rental of homes that aren’t the owner’s primary residence and required platforms to collect taxes on behalf of their hosts, effectively overriding their VCA. Bry says she assumed Airbnb would sue, but it didn’t.

Within days, Airbnb threw its weight behind a movement to overturn the new rules through a citywide referendum.

Public records show **Airbnb donated \$1.1 million** to a California political action committee called “Committee To Expand the Middle Class, Supported by Airbnb, Inc.” That group reported spending \$300,000 to hire signature gatherers to circulate petitions opposing the San Diego ordinance. Airbnb also directly donated \$276,358 to a second group around the same time, records show.

Four weeks after the city council approved the new rules, representatives of Airbnb, HomeAway, and Stand for Jobs delivered more than 62,000 signatures calling for a referendum to rescind the ordinance, nearly twice the number needed to force a citywide vote.

City councilmembers said they didn’t want to risk losing the vote, so they rescinded the ordinance, with plans to try again. “I’m disappointed that a corporation reportedly valued at \$31 billion descended upon our city with its unlimited millions of dollars and used deceptive tactics to force us to where we are today,” Bry said during a council meeting on October 22, just before the council voted to rescind its ordinance.

Airbnb says the petitions garnered so many signatures because the ordinance “would have devastated the local economy, impacted property rights in every San Diego neighborhood, and cost the city millions annually in tax revenue.”

The San Diego City Council plans to introduce a new short-term rental ordinance sometime this fall, Bry told WIRED. If Airbnb challenges a new ordinance, Bry says city officials will be more prepared, and will respond with their own public-education campaign and take the contested ordinance to a public vote.

Airbnb’s battles with local officials have intensified since last year’s Supreme Court ruling in a case involving online retailers. Some tax experts say the decision undercuts Airbnb’s position that it doesn’t have to collect taxes for its hosts. “There is no doubt

City councilmembers said they didn’t want to risk losing the vote, so they rescinded the ordinance, with plans to try again. “I’m disappointed that a corporation reportedly valued at \$31 billion descended upon our city with its unlimited millions of dollars and used deceptive tactics to force us to where we are today,”

whatsoever now that on a constitutional basis Airbnb can be required to collect [taxes],” says Bucks. “There is no justification for these special deals anymore.” Airbnb says it’s monitoring state-by-state developments related to the case.

Airbnb’s recent lawsuits against Palm Beach, Boston, and Miami focus on another aspect of those cities’ ordinances: a requirement that platforms remove listings that don’t comply with the law. Airbnb says the requirements are unconstitutional and technologically unfeasible. But the company does remove illegal listings in its hometown of San Francisco, and has conducted occasional or ongoing purges in New Orleans, Santa Monica, Japan, Berlin, Vancouver, and, briefly, New York City. In New York, Airbnb sued to block a city ordinance requiring it to turn over more detailed information on listings; a judge in January blocked the law from taking effect.

In Boston, city councilor Michelle Wu helped lead the push last year for an ordinance aimed at discouraging hosts from turning apartments and homes into **mini hotels**. The ordinance requires hosts to register with the city and restricts short-term rentals to owner-occupied units. “Airbnb describes itself as a quaint little home-sharing service ... but the reality is that it has grown to be a corporate entity that makes millions of dollars from businesses taking advantage of loopholes and running de facto hotels,” she says.

On April 17, Airbnb sent emails to thousands of Boston Airbnb users criticizing Wu. The email claimed that she was aligned with “big hotel interests” and falsely said she intended to place a “restrictive 30-day cap on unhosted stays.” Wu says Airbnb never sought to discuss the ordinance or check the claims in the email. Airbnb says Wu’s proposal was “anti-tenant, anti-middle class,” and “overly restrictive.”

The ordinance passed in June. Four months later, Airbnb sued the city, alleging the rules—which went into effect January 1—violate state and federal laws. Wu says the city modeled its ordinance after San Francisco's, which Airbnb complies with. The Boston lawsuit—much like others recently filed by Airbnb—only challenges requirements that platforms remove illegal listings and share information with local officials to aid enforcement. The suit seeks an injunction against parts of the law, and the city has agreed not to enforce those sections until a judge rules.

A few weeks after Airbnb sued Boston, Massachusetts governor Charlie Baker signed legislation to tax and regulate short-term rentals at both the state and local levels. The law, which goes into effect in July, requires hosts to register with the state. Information about hosts—minus specific house numbers—will be displayed on a publicly available registry, and hosts who run multiple rentals must pay additional taxes. Airbnb says the law will “jeopardize the privacy of our hosts while placing significant and unnecessary burdens” on them. The company says it is working with state officials to address those concerns.

Airbnb’s municipal confrontations have been a boon for Binzer, whose company Host Compliance works with 150 cities to identify short-term rental owners skirting taxes and regulations and to devise an enforcement strategy without striking deals with Airbnb. He used to be an occasional Airbnb host himself—and paid occupancy taxes—when he lived in Tiburon, California; then he was tapped to help local officials quantify Airbnb’s business in town. He says cities are often overmatched by Airbnb, in part because the company periodically tweaks the site in ways that impede tax collectors and enforcement agencies.

For example, Binzer says that until December 2016, Airbnb included the street name of a property in the metadata attached to the listing. Airbnb’s terms of service prohibit third parties from scraping its site for this kind of information, but critics say it’s crucial for enforcement. Officials in some cities used this data to identify hidden hosts. Then Airbnb removed the street name, and altered the geocoding for listings, changing the latitude and longitude so properties appear in slightly different locations.

“It’s a cat and mouse game,” Binzer says. “They literally put the pin in the wrong place of where the actual property is.”

Airbnb says it shields the street name and other personal information related to hosts “to ensure an added level of privacy when third-party scrape sites aim to compile listing information.”

From Negotiation to Litigation

Around the time Palm Beach County Commissioners passed the short-term rental tax ordinance in October, Gannon says she spoke with a representative from Airbnb. She recalls the company floating a gradual implementation strategy: Airbnb would comply with some of the new rules immediately, but

others—like a system requiring hosts to be properly registered with tax authorities—would be phased in over time.

Gannon thought that seemed reasonable, as long as Airbnb collected and paid the taxes. But she didn't have time to see the discussion through. A month and a half after the ordinance was passed, Airbnb sued the county. The suit argues Airbnb can't be required to police illegal listings and share host information because "Airbnb is a realization of Congress's [free speech] goals" and a "classic intermediary." It doesn't question whether the company can be compelled to collect occupancy taxes; Airbnb is not collecting them in the county, though the ordinance went into effect on January 20. HomeAway also sued the county; the suits have since been combined.

"They were just stringing us along until they had their lawsuit ready to file," Gannon says. "It's typical of Airbnb ... They're getting ready to issue an IPO and go public."

Airbnb's lawsuit against Palm Beach County, Florida.

Updated 3-21-2019, 5:30 pm EDT: This story was updated to clarify the relationship between the American Hotel and Lodging Association and Airbnb, to clarify a characterization of Airbnb's corporate citizenship, and to add a comment clarifying Airbnb's position about its cooperation with the city of New Orleans. The updated story also makes clear that HomeAway was among the companies that helped draft a Tennessee law and that HomeAway has sued Palm Beach County.

Updated 4-5-2019, 4:50 pm EDT: This story was updated to correct the amount Airbnb spent to oppose a San Diego ordinance.

Updated 4-12-2019, 6:00 pm EDT: This story was updated to incorporate additional comment from Airbnb regarding the company's stance on collecting taxes.

Is Airbnb Ameliorating – or Exacerbating – Inequality in Cities?

The short-term rental company professes noble aims, but experts argue it displaces tenants and puts pressure on tight housing markets.

By [Trevor Bach](#) Contributor May 2, 2019, at 3:27 p.m.

Does Airbnb Hurt or Help Cities?

HARPER RICHARDS SPENT most of her childhood in New Orleans. By the time she was in her early 20s, she identified with the city's famous cultural openness and artistic bent, performing as a burlesque dancer and selling handicrafts, like earrings made from recycled guitar strings and coasters fashioned from salvaged Hurricane Katrina wood, at the Frenchmen Art Market.

But even working multiple jobs – at a jewelry store, serving pizza, driving for Uber – her income was relatively low; in early 2015, after learning she was pregnant, she began searching for a long-term home. "I was looking at what I could survive off," she says, "with my income and situation – about to be a single mother."

She signed a lease on one half of a double shotgun house on Josephine Street in Central City, a working class neighborhood separated from downtown and the French Quarter by a freeway. She quickly made it home, repainting walls with a gold molding and turning one room into a nursery. "It was a really good scenario," she says. "Cheap rent and a good little neighborhood. My daughter made a bunch of friends across the street." Then her landlord put the house on the market; in March 2017 a property management company representing an out-of-town buyer gave her a 45-day notice. Richards and her daughter moved into a different place down the street, but the rent was hundreds of dollars more. Soon they left New Orleans. After renovations, the Josephine Street house was promptly listed on Airbnb.

"This Airbnb Displaced 5 People," Richards' neighbor spray-painted in big red letters on the home's sidewalk.

In just over a decade, Airbnb has transformed hospitality around the world. Its platform now counts [some 500 million guest stays in 81,000 cities](#); in December it [announced](#) it had collected and dispersed \$1 billion in tax revenue. But the company's rapid growth has also fueled a caustic debate about urban inequality. Airbnb, whose mission is "to democratize travel by allowing anyone to belong anywhere," argues that it provides an economic equalizer, helping even hosts of few means to boost incomes and manage otherwise unaffordable housing costs.

"One of the big questions that we have is, 'How much of an outsize role do we want tourism to have in our city – do we really want just to turn the entire city over to like basically being a simulacrum of New Orleans?'" says DeDecker. 'How much are we asking of our residents to give up in order to make space for these tourists?'"

Yet a growing army of critics allege that, in dozens of cities around the world, ***the proxy hotel service more often does the opposite, hyper-accelerating affordable housing crises and gentrification patterns that force out residents.***

"It's really the rich who are getting richer off of this situation," says Richards. "Airbnb has run so rampant across the entire city that there's barely any rentals left for locals, and the rentals that are available are skyrocketing in price."

How Airbnb Changed Housing

Like its closest Silicon Valley industry-disrupting cousins, the ride-sharing apps Uber and Lyft, Airbnb, with a simple, decentralized concept, virtually redefined a decades-old industry overnight: Through the magic of the internet, suddenly anyone with a spare room could become a hotelier, and travelers had an easy gateway to a new kind of experience. A few years after the company started in San Francisco in 2008, tourists could choose from hundreds or thousands of nontraditional hotel options in nearly every city in the world, including a carefully decorated room in a 1930s London flat (\$64 a night), a tiny house made from reclaimed wood in West Seattle (\$110 a night), and a shared traditional yurt in Ulaanbaatar, Mongolia (\$10 a night).

"It's really the rich who are getting richer off of this situation," says Richards. "Airbnb has run so rampant across the entire city that there's barely any rentals left for locals, and the rentals that are available are skyrocketing in price."

"First and foremost it's our community," says Christopher Nulty, the company's head of public affairs for the Americas, explaining the company's success. "There's something really special about going and staying in someone else's home – staying outside the central hotel district and being able to see a new place through the eyes of a local."

But as ***the platform has expanded beyond homeowners with a spare room to profit-minded investors who buy and then rent entire homes***, it's also put a new squeeze on housing markets.

In Toronto the platform has eliminated some 6,500 homes from the city's badly pinched housing market.

Particularly for renters in high-demand cities, Airbnb can increasingly feel like a kind of digital grim reaper: In Toronto the platform has eliminated some 6,500 homes from the city's badly pinched housing market, according to [a recent report](#) from the coalition group Fairbnb. In Boston long-time residents of Chinatown – a dense neighborhood that's become the epicenter of [that city's gentrification battle](#) – are being displaced by overseas speculators, who buy property at inflated prices only to turn around and list on the site.

"If you just walk around Chinatown you see the demographic change," says Karen Chen, executive director of the Chinese Progressive Association, which advocates for residents in the

neighborhood. "It's taking housing from the market, but as it's doing that it's actually creating a chain of rising rent."

A Chain of Rising Rents

Independent research confirms that Airbnb listings do in fact cause higher rents. "What's happening is that some landlords are switching from the long-term market to the short-term market," says Davide Proserpio, an assistant professor of marketing at the University of Southern California who co-authored [a broad study](#) on the issue. "Why? Because Airbnb reduces a lot of friction and makes renting in the short-term market quite easy for everyone."

The impact, unsurprisingly, varies wildly by city. One 2016 analysis predicted that if Boston's rapid rate of Airbnb expansion in 2015 continued for three more years the service would cause an average rent increase of as much as \$2,136 annually. A 2018 [study](#) found that in New York the service has increased annual rent for the median tenant by \$380, and over \$700 in some neighborhoods.

"We're really looking at short-term rentals as like a housing justice issue," says Breonne DeDecker, a program manager at Jane Place, a housing rights nonprofit in New Orleans. In that city, where [rents have exploded](#) in areas with the highest concentrations of listings, DeDecker says Airbnb rentals have displaced so many locals that many traditionally residential districts – including in working-class black neighborhoods like the Seventh Ward and Treme – now resemble weekday ghost towns. "Thursday, Friday and Saturday it's just awash in young white tourists."

Airbnb vehemently rejects conclusions that suggest the platform exacerbates inequality. Much of the underlying research, Nulty charges, was funded by the hotel industry and relies on "scraped, inaccurate data" on listings. (The industry has in fact waged an aggressive campaign against Airbnb, including funding research. Many studies rely on scraped web data as a proxy – Airbnb has repeatedly fought data collection attempts by regulators.) He points out that the company didn't invent the concept of vacation rentals – indeed, many whole home listings simply migrated onto Airbnb from other platforms – and that the majority of hosts are using the platform to rent a spare room to generate extra income, like an average [\\$6,400 annually for hosts in New York](#).

"We're really looking at short-term rentals as like a housing justice issue,". Airbnb rentals have displaced so many locals that many traditionally residential districts – including in working-class black neighborhoods like the Seventh Ward and Treme – now resemble weekday ghost towns. "Thursday, Friday and Saturday it's just awash in young white tourists."

An Economic Stimulus?

The platform, Nulty argues, can also serve as an important economic stimulus in underserved areas: the portion of Washington, D.C. east of the Anacostia River, a predominantly poor and black neighborhood, has virtually no traditional hotels but hundreds of Airbnb listings. The company does remove listings that violate local rental laws, [including some 5,000 in New York](#), and has long been outspoken against evictions.

"We've been so clear about this," Nulty says. "We do not want bad actors on our platform who are purposefully evicting tenants with the intention of Airbnb'ing their space."

But analysts say that, on the whole, underlying home ownership patterns mean that the gains from Airbnb are disproportionately spread among a demographic that already skews both white and wealthy.

"We can say the winners from Airbnb – generally they're pretty concentrated at the top," says Josh Bivens, director of research at the Washington, D.C.-based, left-leaning Economic Policy Institute. In a [report published in January](#) Bivens concluded Airbnb's net economic costs outweigh its benefits: Even if the platform's impact on aggregate housing prices has been relatively small, he argues, it has accelerated an affordable housing crisis that, for millions of Americans, was already dire. "It's another straw on the camel's back."

Municipalities have struggled to keep up. Regulation of listings has been patchwork, with cities around the world taking different approaches aimed especially at curbing whole-home rentals. In 2016 Berlin [implemented a near-total ban](#), later amended, on rentals of more than half an apartment. San Francisco passed laws that restrict listings to primary residences and cap stays where no host is present to 90 days annually. In December, Massachusetts passed a sweeping new law that opens up listings to hotel taxes and public disclosure. Governor Charlie Baker praised the measures as a "leveling of the playing field."

Yet even with rules in place, regulatory agencies are often overwhelmed, and savvy listers find ways to evade requirements: In Miami Beach one property manager was associated with more than \$1.2 million in dozens of illegal listing fines; in February investigators in New York exposed a vast, city-wide scheme, orchestrated by an Israeli former real estate broker, that generated \$20 million in revenue by using multiple identities, manipulated addresses and proxy corporations to flout city rental laws and the company's "one host, one home" rule – specific to New York and a handful of other cities. While in many cases the company has struck voluntary agreements with cities, it also regularly fights regulation and taxation attempts, including with lawsuits against Palm Beach County, Florida, New York and Boston.

"They want to be a company that operates in the space of the really large hotel chains, and yet claim to not be a hotel chain," says Bivens. "I don't think you can have it both ways."

A heated regulatory battle is also underway in New Orleans, where some new City Council members campaigned on the issue of tightening the city's lax regulation of short-term rentals.

In March the city's planning commission endorsed a proposal to ban whole-home rentals in residential areas, representing a dramatic change of course – if the measures eventually pass a full council vote – for a mid-size city with some 11 million annual tourists. At stake, advocates say, is the identity of New Orleans itself.

"One of the big questions that we have is, 'How much of an outsize role do we want tourism to have in our city – do we really want just to turn the entire city over to like basically being a simulacrum of New Orleans?'" says DeDecker.
"How much are we asking of our residents to give up in order to make space for these tourists?"

[Trevor Bach](#), Contributor

Trevor Bach is a journalist based in Detroit. Follow him on [Twitter](#).

Tags: [New Orleans](#), [Airbnb](#), [inequality](#)

There is overwhelming evidence that Short Term Whole House Rentals are detrimental to communities and that any so called benefits are outweighed by the damages inflicted on neighborhoods and the housing shortages and rent increases that always follow Short Term Rentals. This is a sample of some of this evidence.

Short Term Rentals in the News:

Coronavirus is exposing how Airbnb caused rent worldwide to skyrocket, Daily Dot

<https://www.dailydot.com/debug/airbnb-coronavirus-rental-marker/>

During the Corona virus outbreak:

“For years now, housing experts [have pointed](#) to Airbnb as the cause of the world’s ever-dwindling housing supply and skyrocketing rents.

Now, according to property website Daft Media, there has been a 64% increase in rental properties across Dublin. Other tourist destinations like [Edinburgh and London](#) also saw increases in new rental listings, at 62% and 45% respectively.

New York housing activist Peter Harrison, inventor of tenant organizing app HomeBody, points out that the same is happening in the U.S. market as well.

“Btw this is happening all across the US too. Show me a city with a housing crisis and I’ll show you [@Airbnb](#) being front and center,” he tweeted.”

“Btw this is happening all across the US too. Show me a city with a housing crisis and I’ll show you [@Airbnb](#) being front and center,” he tweeted.”

[Mar 21](#)

64% rise in rental properties across [#Dublin](#) in midst of [#Covid 19](#) crisis according to property website as landlords start withdrawing their rentals from short-term listing sites like [#Airbnb](#) and are offering them into the market instead.

Airbnb Has Made Housing More Expensive In Some Parts of D.C., New Research Paper Finds

<https://wamu.org/story/20/01/13/airbnb-has-made-housing-more-expensive-in-some-parts-of-d-c-new-research-paper-finds/>

Home-sharing platforms like Airbnb, VRBO and HomeAway can offer visitors to D.C. all sorts of options for cheap places to stay, but they also seem to be making parts of the city more expensive for long-term residents.

The economic costs and benefits of Airbnb No reason for local policymakers to let Airbnb bypass tax or regulatory obligations

<https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-no-reason-for-local-policymakers-to-let-airbnb-bypass-tax-or-regulatory-obligations/>

... in many local markets, the arrival and expansion of Airbnb is raising questions about its potential negative impacts on local housing costs, quality of life in residential neighborhoods, employment quality in the hospitality industry, and local governments' ability to enforce municipal codes and collect appropriate taxes.

- **The economic costs Airbnb imposes likely outweigh the benefits.** While the introduction and expansion of Airbnb into U.S. cities and cities around the world carries large potential economic benefits and costs, the costs to renters and local jurisdictions likely exceed the benefits to travelers and property owners.
- **Rising housing costs are a key problem for American families, and evidence suggests that the presence of Airbnb raises local housing costs.** The largest and best-documented potential cost of Airbnb expansion is the reduced supply of housing as properties shift from serving local residents to serving Airbnb travelers, which hurts local residents by raising housing costs. There is evidence this cost is real:
 - Because housing demand is relatively inelastic (people's demand for somewhere to live doesn't decline when prices increase), even small changes in housing supply (like those caused by converting long-term rental properties to Airbnb units) can cause significant price increases. High-quality studies indicate that Airbnb introduction and expansion in New York City, for example, may have raised average rents by nearly \$400 annually for city residents.
 - The rising cost of housing is a key problem for American families. Housing costs have risen significantly faster than overall prices (and the price of short-term travel accommodations) since 2000, and housing accounts for a significant share (more than 15 percent) of overall household consumption expenditures.
 - Studies claiming that Airbnb is supporting a lot of economic activity often vastly overstate the effect because they fail to account for the fact that much of this spending would have been done anyway by travelers staying in hotels or other alternative accommodations absent the Airbnb option.

Studies claiming that Airbnb is supporting a lot of economic activity often vastly overstate the effect because they fail to account for the fact that much of this spending would have been done anyway by travelers staying in hotels or other alternative accommodations absent the Airbnb option.

- **Property owners do benefit from Airbnb’s capacity to lower the transaction costs of operating short-term rentals, but the beneficiaries are disproportionately white and high-wealth households.** Wealth from property ownership is skewed, with higher-wealth and white households holding a disproportionate share of housing wealth overall—and an even more disproportionate share of housing wealth from nonprimary residences because they are much more likely to own nonprimary residential property (such as multi-unit Airbnb rentals).
- **City residents likely suffer when Airbnb circumvents zoning laws that ban lodging businesses from residential neighborhoods.** The status quo of zoning regulations in cities reflects a broad presumption that short-term travelers likely impose greater externalities on long-term residents than do other long-term residents. Externalities are economic costs that are borne by people not directly engaged in a transaction. In the case of neighbors on a street with short-term renters, externalities include noise and stress on neighborhood infrastructure like trash pickup. These externalities are why hotels are clustered away from residential areas. Many Airbnb rental units are in violation of local zoning regulations, and there is the strong possibility that these units are indeed imposing large costs on neighbors.
- ***Because Airbnb is clearly a business competing with hotel lodging, it should be subject to the same taxation regime as hotels. In regard to zoning regulations, there is no empirical evidence that the net benefits of Airbnb introduction and expansion are so large that policymakers should reverse long-standing regulatory decisions simply to accommodate the rise of a single company.***
- **Potential costs**
- The single biggest potential cost imposed by Airbnb comes in the form of **higher housing costs for city residents** if enough properties are converted from long-term housing to short-term accommodations. If property owners take dwellings that *were* available for long-term leases and convert them to short-term Airbnb listings, this increases the supply of short-term rentals (hence driving down their price) but decreases the supply of long-term housing, increasing housing costs for city residents. (We refer to all long-term costs of shelter as “housing,” including rentals and owners’ equivalent rental costs.)

Wealth from property ownership is skewed, with higher-wealth and white households holding a disproportionate share of housing wealth overall—and an even more disproportionate share of housing wealth from nonprimary residences because they are much more likely to own nonprimary residential property (such as multi-unit Airbnb rentals).

- **Potential benefit three: Travelers' spending boosts the economic prospects of cities**
- The lower prices and greater range of options made available by the introduction and expansion of Airbnb could, in theory, induce a large increase in travel and spark economic growth in destination cities. This is precisely the claim made in a report by NERA Economic Consulting (NERA 2017), which says that Airbnb "supported" 730,000 jobs and \$61 billion in output globally, with roughly a quarter of this economic gain occurring in the United States.

- ***To be blunt about these claims, they are flatly implausible.***
They rest on the assumption that all money spent by those renting Airbnb units is money that would not have been spent in some alternative accommodations had Airbnb not existed.

Potential costs of Airbnb introduction and expansion

Potential cost one: Long-term renters face rising housing costs

Potential cost two: Local government tax collections fall

Potential cost three: Externalities inflicted on neighbors

Potential cost four: Job quantity and quality could suffer

Conclusion: Airbnb should have to play by the same rules as other lodging providers

Airbnb Is Screwing Over New York's Vulnerable Neighborhoods

Everyone knows Airbnb is bad for the housing market. But it's starting to get worse.

https://www.vice.com/en_us/article/ywxyym/airbnb-is-screwing-over-new-yorks-vulnerable-neighborhoods

David Wachsmuth does not mince words when he talks about the impact of Airbnb rentals: "They impose costs on every single other person in the city," he told me.

Wachsmuth said there is a solution that doesn't require the entire dismantling of Airbnb culture. If the service were limited to homesharing—in other words, people who actually live in the units rent their

apartments out on weekends or holidays—the housing market would remain stable and people could still make money.

The Airbnb Effect: It's Not Just Rising Home Prices

<https://www.citylab.com/equity/2019/02/study-airbnb-cities-rising-home-prices-tax/581590/>

D.C. is [restricting it](#). Florida might [stop investing in it](#). New Orleans is [trying to ban it completely](#). Across the country, legislators are not happy with Airbnb.

The study's author Josh Bivens argues, cities need to start treating Airbnb like any other hotel business, and regulate it accordingly. "It becomes a straight conflict between whose interests you care more about: long-term residents of the city, or those that visit it," Bivens said.

Since Airbnb helps homeowners take existing housing stock and turns some of it into short-term units, its biggest measured effect so far has been on housing prices—by repurposing units that might otherwise be long-term housing, it's straining an already supply-short market. Rents rise in the process.

Since 60 percent of the property wealth in homeowners' primary household is concentrated in the top 20 percent of households—and more than 80 percent of the wealth is held by white households—it stands to reason, Bivens says, that the ones who stand to make the most from Airbnb are already the wealthiest, and the whitest.

"It becomes a straight conflict between whose interests you care more about: long-term residents of the city, or those that visit it," Bivens said.

Is Airbnb Ameliorating – or Exacerbating – Inequality in Cities?

"They want to be a company that operates in the space of the really large hotel chains, and yet claim to not be a hotel chain," says Bivens. "I don't think you can have it both ways."

<https://www.usnews.com/news/cities/articles/2019-05-02/airbnbs-controversial-impact-on-cit>"They want to be a company that operates in the space of the really large hotel chains, and yet claim to not be a hotel chain," says Bivens. "I don't think you can have it both ways."

But as the platform has expanded beyond homeowners with a spare room to profit-minded investors who buy and then rent entire homes, it's also put a new squeeze on housing markets. Particularly for renters in high-demand cities, Airbnb can increasingly feel like a kind of digital grim reaper: In Toronto the platform has eliminated some 6,500 homes

from the city's badly pinched housing market, according to [a recent report](#) from the coalition group Fairbnb. In Boston long-time residents of Chinatown – a dense neighborhood that's become the epicenter of [that city's gentrification battle](#) – are being displaced by overseas speculators, who buy property at inflated prices only to turn around and list on the site.

"They want to be a company that operates in the space of the really large hotel chains, and yet claim to not be a hotel chain," says Bivens. "I don't think you can have it both ways."

Galia says

[June 23, 2017 at 8:28 AM](#)

Hello!

I just wanted to say that I understand and benefits from their experience, but I must say that AirnBnB apartments for tourists means a great lack of opportunities for locals who want to stay and live in their cities. We are suffering this big problem in Barcelona (Catalunya_Spain) now ... The locals can not afford to rent the prices ... I really think that this platform is **no longer collaborative: it is speculative**. Think globally :)) AirBnB and similar platforms destroy local communities for the benefit of tourists and private speculators.

How Taxpayers Subsidize AirBnB's Cheap Prices

<https://www.nakedcapitalism.com/2017/01/how-taxpayers-subsidize-airbnbs-cheap-prices.html>

Airbnb says one of the key benefits of what it calls "home sharing" is to reduce costs for travelers and to help hosts earn extra income. But hoteliers complain they face unfair competition, as a result of tax differences and gaps in regulatory enforcement of everything from hygiene to disabled access and fire safety....

The ability of AirBnB to operate at all is proof of the success of neoliberal indoctrination. Most communities have strict zoning laws. Renting out your home, even on a part-time basis, is a commercial activity. Most localities ignore violations of that distinction for businesses that don't generate traffic, such as a bookkeeper or web designer working from their home. But one of the reasons for this distinction was to preserve the integrity of residential communities and keep transients out. But it seems that nothing is to stand in the way of rental extraction in the name of the sharing economy...even when the sharing consists of pilfering from the very communities that cut businesses like AirBnB slack that they do not deserve.

Inside Airbnb's 'Guerrilla War' Against Local Governments

<https://www.wired.com/story/inside-airbnbs-guerrilla-war-against-local-governments/>

Similar dramas are playing out around the country. From Nashville to New Orleans to Honolulu, Airbnb is battling local officials over requests to collect occupancy taxes and ensure that the properties

Airbnb has fought city officials over regulations aimed at preventing homes from being transformed into *de facto* hotels and requests from tax authorities for more specific data about hosts and visits.

listed on its site comply with zoning and safety rules. In the past five months alone, the company has spent more than half a million dollars to overturn regulations in San Diego and has sued Boston, Miami,

and Palm Beach County over local ordinances that require Airbnb to collect taxes or remove illegal listings. Elsewhere, Airbnb has fought city officials over regulations aimed at preventing homes from being transformed into *de facto hotels* and requests from tax authorities for more specific data about hosts and visits.

Airbnb is engaged in “a city-by-city, block-by-block guerrilla war” against local governments, says Ulrik Binzer, CEO of Host Compliance, which helps cities draft and enforce rules for short-term rentals, sometimes putting it at odds with hosting platforms. “They need to essentially fight every one of these battles like it is the most important battle they have.”

As the city (Nashville) inched closer to prohibiting so-called “mini hotels” —non-owner-occupied homes used exclusively as vacation rentals—Airbnb shifted its focus from City Hall to the state Capitol three blocks away. In the latter half of 2017, the company more than doubled the number of lobbyists it employed in Tennessee, to from four to 11, and spent between \$225,000 and \$350,000 on lobbying between February 2017 and August 2018, according to reports the company filed with the state.

Around this time, a political action committee called the Committee to Expand Middle Class By Airbnb, Inc. donated \$10,000 to groups representing Tennessee Republicans, according to campaign finance records. The donations included \$2,500 to the campaign of state representative Cameron Sexton, who had introduced a bill in 2017 specifying that short-term rentals should not be considered hotels under state law. The bill, known as the Short-Term Rental Unit Act, was drafted in consultation with Airbnb and other short-term rental companies, including HomeAway, [according](#) to the *Tennessean*. It included a provision stripping cities of the power to ban existing short-term rentals. The Tennessee General Assembly passed the bill in April 2018

Summary of Options and Chelan County Board of County Commissioner Direction

This table provides a high level summary of consultant notes from the situation assessment and general direction from the Board of County Commissioners' work session on of March 31, 2020. The information is subject to change and correction.

| Topic | Options Evaluated | BOCC Direction 3/31/20 |
|---------------------------------|---|--|
| Zones Allowed | <ul style="list-style-type: none"> ■ Vacation Rentals with permits of different lengths – accessory use and lesser days lengths in rural residential zones; permitted in commercial zones ■ Vacation Rentals with 1% cap – permitted in rural residential and commercial zones, conditionally permitted in resource zones, limited by county or area cap ■ Vacation Rentals Peshastin or Manson UGAs – limited to existing in residential zones and new ones in commercial zones | <ul style="list-style-type: none"> ■ Vacation Rentals with 1% cap (see below). ■ Consider permit type by location: rural, resource, UGAs. |
| Limits on Numbers | <ul style="list-style-type: none"> ■ Cap the number of short-term rentals, countywide or by area (e.g. UGA versus non-UGA area), e.g. 1%. ■ Establish permit authorizations of different lengths. ■ Establish distance/separation requirements. | <ul style="list-style-type: none"> ■ Develop a cap. ■ Overlays for density (e.g. existing grandfathered but no additional vacation rentals in Leavenworth). Similar to Okanogan County. ■ Other rules apply countywide. |
| Unit Types | <ul style="list-style-type: none"> ■ Allow short-term rentals within a person's primary residence only. Permit is not transferable to new owner. ■ Allow within either primary residence or accessory dwelling units, recreational vehicles, tents and other secondary housing units. Permit is transferable to new owner. | <ul style="list-style-type: none"> ■ Allow within either primary residence or accessory dwelling units. ■ Permit is not transferable to new owner. |
| Occupancy | <ul style="list-style-type: none"> ■ Relate occupants to bedrooms; allow limited occupancy in common areas. ■ Cap at a flat number of guests, e.g. 10 per International Residential Code. | <ul style="list-style-type: none"> ■ Relate occupants to bedrooms and have a cap at 10. ■ Bedrooms/sleeping units advertised will be used in compliance. |
| Standards for health and safety | <ul style="list-style-type: none"> ■ Follow RCW standards only. ■ Tailored to local conditions and needs. ■ Combination. | <ul style="list-style-type: none"> ■ Combination – state & local standards. ■ Ensure there is response within 30-45 minutes by designated manager. |

| Topic | Options Evaluated | BOCC Direction 3/31/20 |
|---------------------------------------|--|---|
| Permits, Inspections, and Enforcement | <ul style="list-style-type: none"> Consider all together: Require an annual land use permit. Initial permit should require inspections or review by Fire District and Health District. Set permit fees based on cost of permit review and inspection. Allow owners to provide affidavit of compliance on renewals. Enforce based on consistency with RCW 64.37.030 and Chelan County Title 16. (Note RCW 64.37.030 references RCW 7.80; and 7.80.010 indicates a county can hear and determine civil infractions pursuant to its own system established by ordinance.) | <ul style="list-style-type: none"> Ensure fire protection plan in unit and ability to restrict use of fire pit or lock portable ones. Address noise, garbage, trespassing. Post the unit with rules and provide to renters. Annual permit number is on advertisement to ease tracking. Advertising is proof of use. |
| | | <ul style="list-style-type: none"> Consider all the elements listed. Annual permit with Community Development; also fire and health inspections. Costs should address permits and inspections (desired also compliance but discussed that appeared infeasible from PA office). Citations should be given to owner (some discussion of citation to renter – appeared more support to address to owner). Consider the docket – revamp of Title 16 for onsite citation. |

Public comment:

- Consider limiting daytime parties – can be huge.
- Consider sun-setting in impacted areas (e.g. not about 5% of stock in Leavenworth area)

Chelan County Short-Term Rental Situation Assessment & Options

March 30, 2020

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1 Introduction

Chelan County has a population of over 77,000 people in nearly 3,000 square miles though the population is focused on about a quarter of the county territory. Chelan County is a major destination with year-round recreation at mountains and lakes and agri-tourism opportunities.

Short-term rentals¹ accommodating visitors have been established rapidly over the last several years. Chelan County has been considering how to best address short-term rentals to allow for property owner income while protecting the character of residential communities across the county.

In 2019, a draft code was developed by Chelan County Community Development Department staff. It was heard by the Planning Commission and Board of County Commissioners but denied. The denial was based on concerns the proposed code did not address issues raised by members of the public, and a desire by the Board of County Commissioners to review other alternatives. A public and legislative review process will follow with the Planning Commission and eventually the Board to review specific legislative proposals.

This Short-Term Rental Situation Assessment & Options paper provides the following information:

- Current short-term rental situation in Chelan County countywide and within smaller geographies,
- Summary of public comment to date including major themes,
- Highlights of stakeholder proposals to regulate short-term rentals,
- Best practices and regulatory framework, including approaches by other communities, and
- Code amendment options.

Following County staff review, the Situation Assessment and Options will be presented to the Board of County Commissioners for review and direction. Formal code language will be developed to take forward to the Planning Commission and public review.

¹ Where residential dwelling is rented out on a nightly basis for less than 30 days to individual guests.

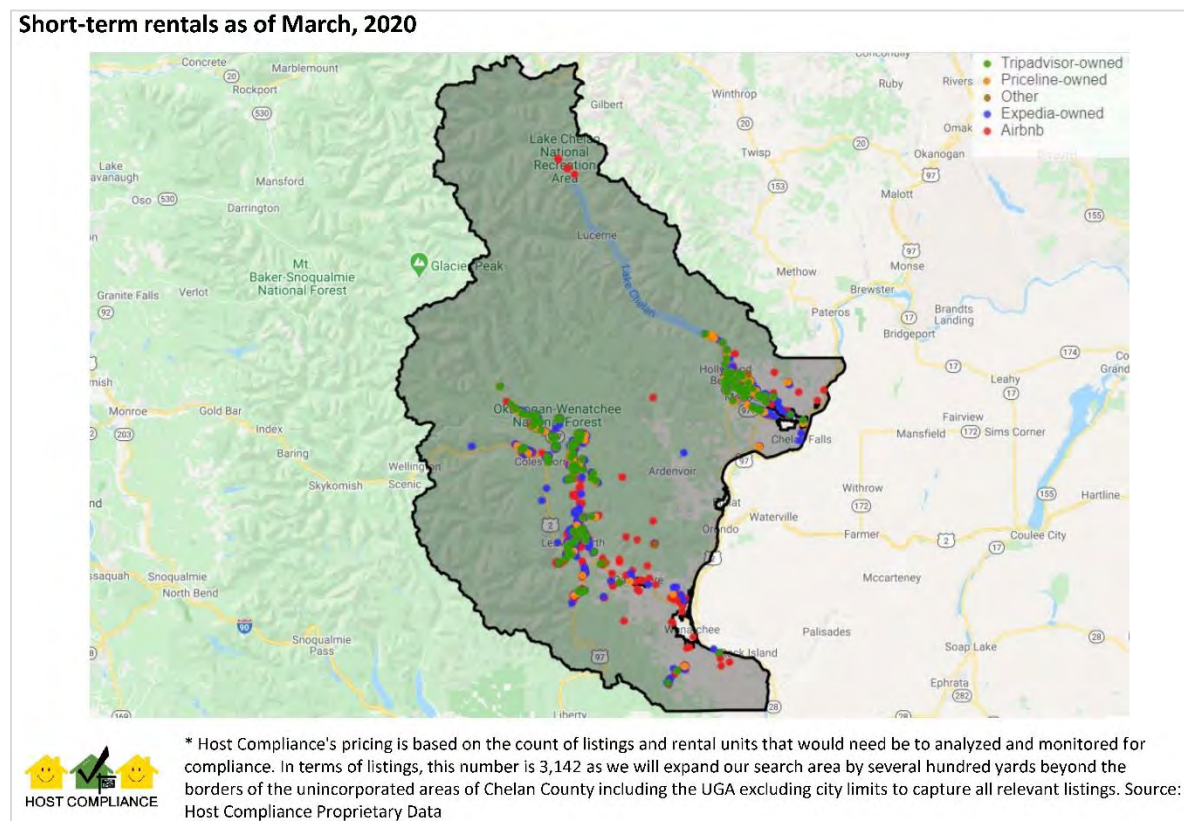
2 Current Conditions

This section addresses the current numbers, location, and types of short-term rentals in Chelan County with a focus on unincorporated areas under the land use authority of Chelan County.

2.1 NUMBER AND LOCATION OF SHORT-TERM RENTALS

In unincorporated areas including the urban growth areas (UGAs) and rural areas, Host Compliance has identified 2,376 listings, representing **1,535 unique rental units** as of March 2020. See Exhibit 1 for approximate locations. See also Attachment E for details of Host Compliance's review.

Exhibit 1. All Listing Sources – Unincorporated areas of Chelan County Host Compliance

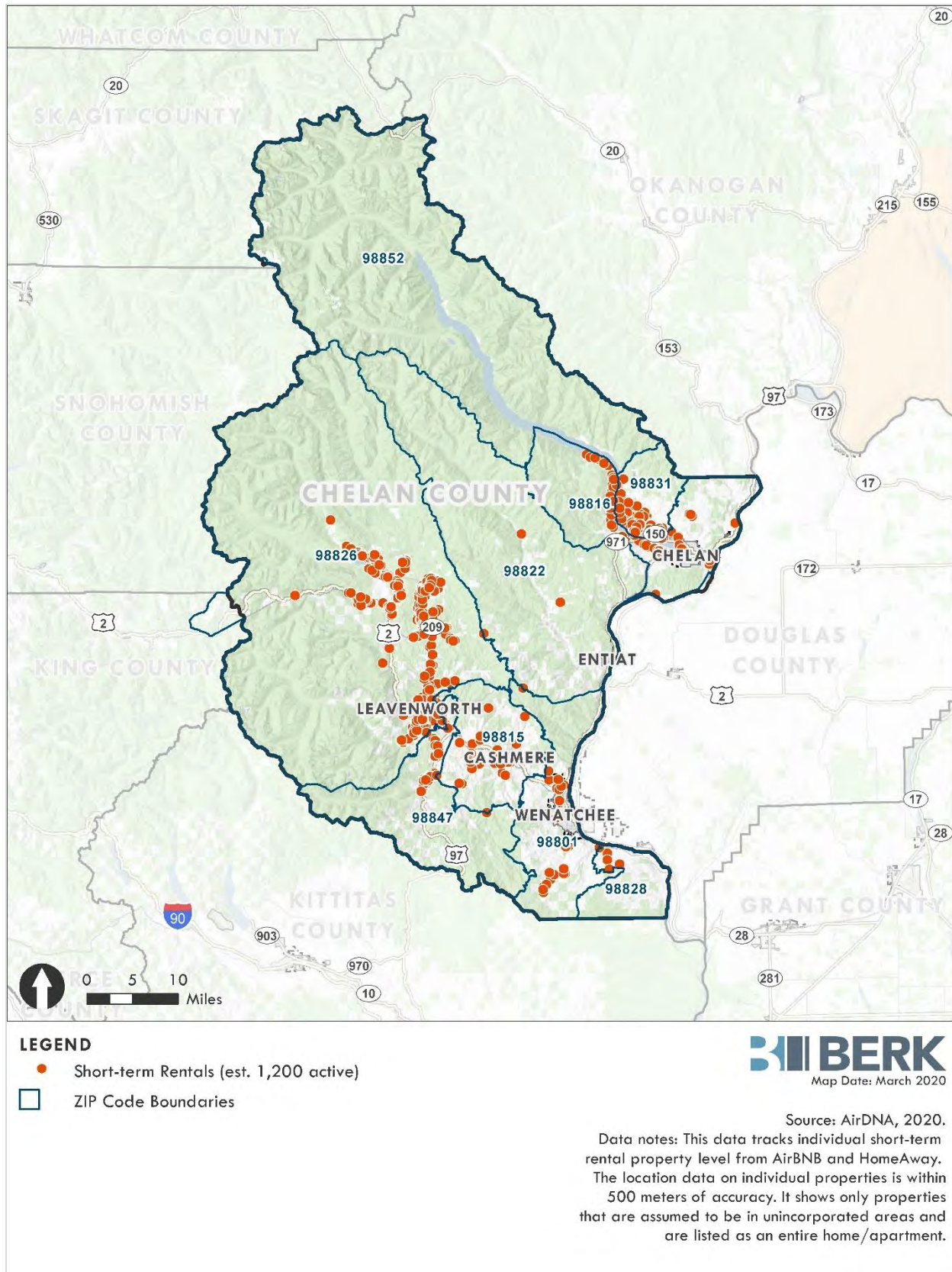


Source Host Compliance

In addition to Host Compliance information provided to Chelan County, BERK Consulting, Inc. obtained short-term rental data through AirDNA (<https://www.airdna.co/>) which provided a database of geocoded listings from 2014-2020 (January) focusing on AirBnB and HomeAway listings. The AirDNA database evaluation allowed a review of trends and details of unit characteristics as well as spatial location of units in relation to zoning districts.

Within unincorporated Chelan County, the AirDNA data identified over 1,308 active properties as of January 2020. See Exhibit 2. These would overlap the Host Compliance count of 1,535 unique rental units as of March 2020. **Note:** Mapping of AirDNA data focused on properties where the full home/apartment is rented which is over 1,200 units.

Exhibit 2. Unincorporated County Active Listings by Zip Code – January 2020: AirBnB and Home Away



Note: Geographic location is accurate for most properties with some locations within 500 meters for privacy.
Sources: Chelan County Assessor; AirDNA February 2020; BERK 2020

The increase in short-term rental units in the last five years has been over 1,100. See Exhibit 3.

Between 2015 and 2019 there was a 55% rate of increase. The rate of increase was 10% between 2017 and 2019, and 4% between 2018 and 2019.

Exhibit 3. Unincorporated Chelan County Active Listings of all Listing Types
– December 2014 to December 2019: AirBnB and Home Away Monthly Data*

| Zip Code | Zip Code Place | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 |
|--------------------|----------------|-----------|------------|------------|------------|--------------|--------------|
| 98815 | Cashmere | | 4 | 11 | 25 | 30 | 35 |
| 98816 | Chelan | 1 | 3 | 14 | 64 | 60 | 75 |
| 98822 | Entiat | | 3 | 4 | 4 | 2 | 2 |
| 98826 | Leavenworth | 59 | 110 | 205 | 611 | 816 | 868 |
| 98828 | Malaga | 1 | 2 | 2 | 4 | 4 | 4 |
| 98831 | Manson** | 6 | 9 | 56 | 212 | 215 | 229 |
| 98847 | Peshastin | 4 | 8 | 16 | 41 | 47 | 56 |
| 98801 | Wenatchee | 5 | 6 | 14 | 25 | 32 | 39 |
| Grand Total | | 76 | 145 | 322 | 986 | 1,206 | 1,308 |

Note: *Differences in unit counts with other tables are due to inclusion of all unit types and use of a common reporting month of December whereas other tables focus on January 2020 information and whole homes only which are a large proportion.

**Includes about 83 units in 2019 on tribal land.

Source: AirDNA, BERK 2020

Most of the short-term rentals are in rural areas with fewer in UGAs due to their smaller extent. See Exhibit 4.

Exhibit 4. Short-Term Rentals in Unincorporated Areas – Active Listings January 2020 Monthly Data*

| Unincorporated Portions of Zip Codes | Properties |
|--------------------------------------|------------|
| Cashmere-98815 | 32 |
| Rural | 27 |
| Cashmere UGA | 5 |
| Chelan-98816 | 70 |
| Rural | 65 |
| Chelan UGA | 5 |

| Unincorporated Portions of Zip Codes | Properties |
|--------------------------------------|--------------|
| Entiat-98822 | 2 |
| Rural | 2 |
| Leavenworth-98826 | 811 |
| Rural | 782 |
| Leavenworth UGA | 29 |
| Malaga-98828 | 4 |
| Rural | 4 |
| Manson-98831 | 221 |
| Rural | 50 |
| Manson UGA** | 171 |
| Peshastin-98847 | 54 |
| Rural | 46 |
| Peshastin UGA | 8 |
| Wenatchee-98801 | 43 |
| Rural | 28 |
| Wenatchee UGA | 15 |
| Grand Total | 1,237 |

Note: * Reports data as of January rather than December (see Exhibit 3). Monthly active listing data produces slightly fewer full short-term rental units than property-based data which reports 1,247.

**Includes about 83 units on tribal land.

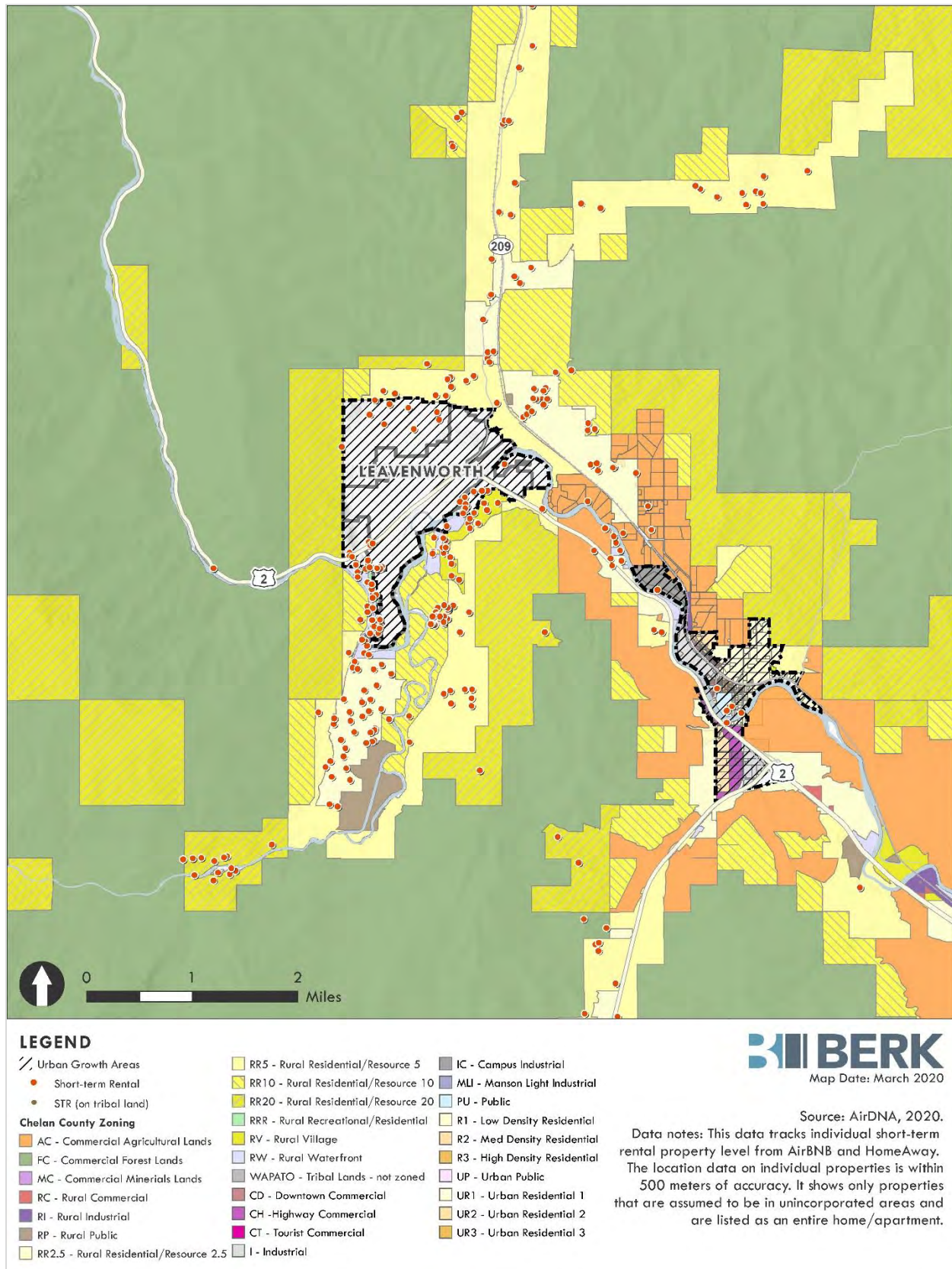
Source: AirDNA, BERK 2020

2.2 LOCATION IN RELATION TO ZONING DISTRICTS

The following pages show the recent AirBnB and HomeAway listings as of January 2020 in the Leavenworth, Lake Wenatchee, and Lake Chelan/Manson vicinities in relation to Chelan County zoning. The short-term rentals are occurring in rural areas and UGAs across nearly all zones.

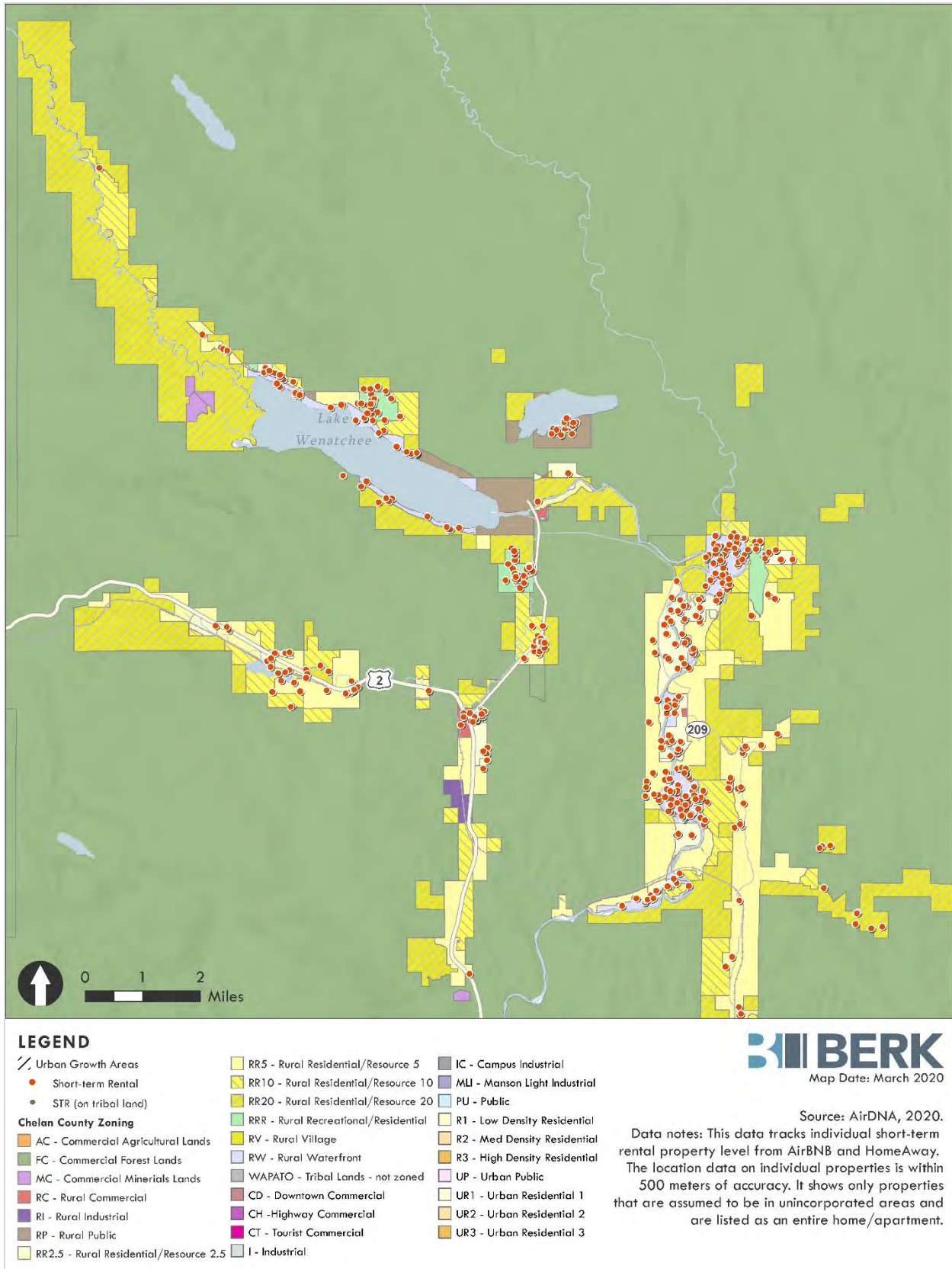
See Exhibit 5 addressing the Leavenworth and Peshastin areas, Exhibit 6 illustrating the Lake Wenatchee Area, and Exhibit 7 with the Manson and Lake Chelan Area.

Exhibit 5. Leavenworth/Peshastin Area Active Listings, Unincorporated—January 2020: AirBnB & Home Away



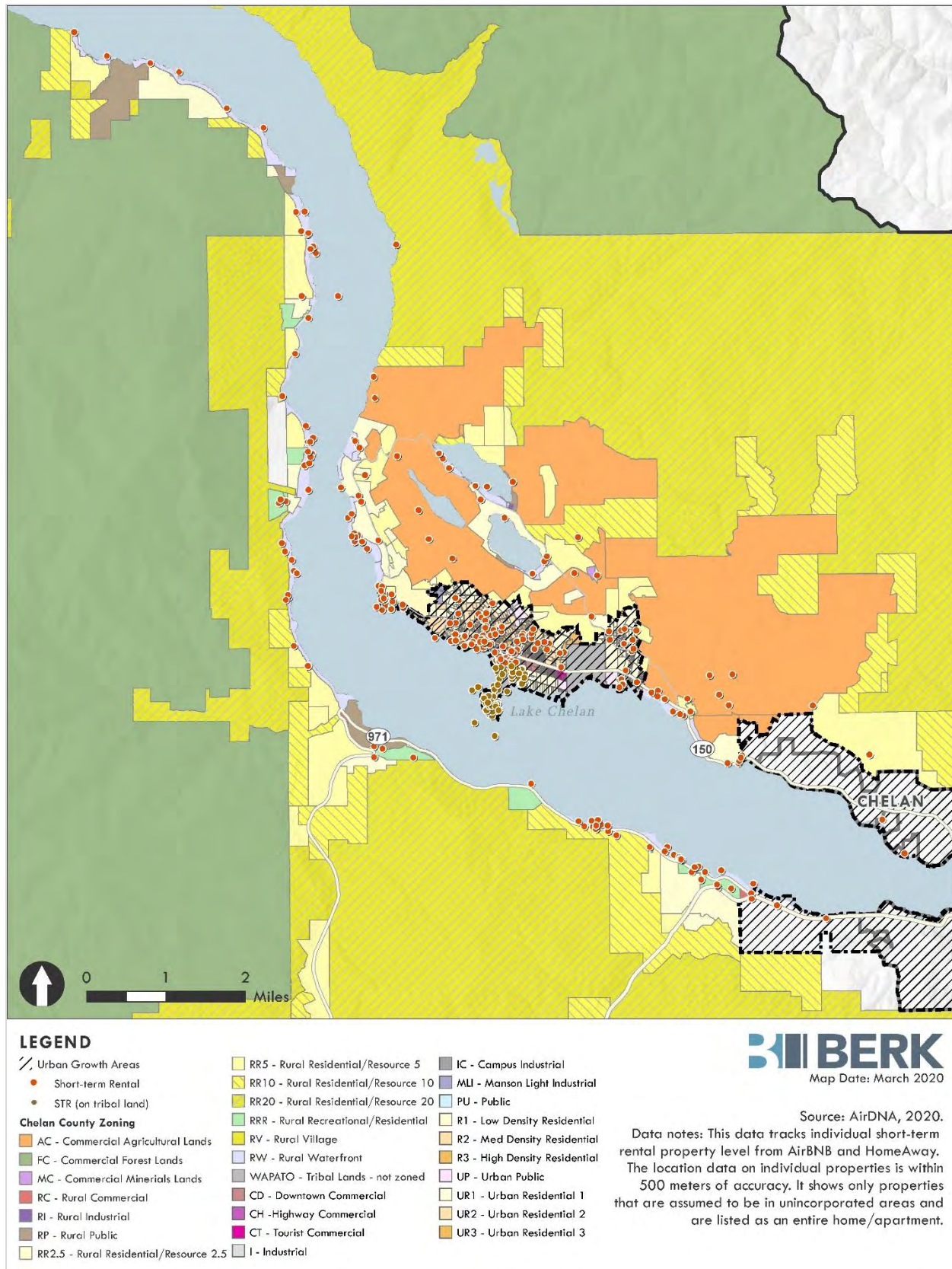
Note: Geographic location is accurate for most properties with some locations within 500 meters for privacy.
Sources: Chelan County Assessor; AirDNA February 2020; BERK 2020

Exhibit 6. Lake Wenatchee Active Listings (Unincorporated) – January 2020: AirBnB and Home Away



Note: Geographic location is accurate for most properties with some locations within 500 meters for privacy.
Sources: Chelan County Assessor; AirDNA February 2020; BERK 2020

Exhibit 7. Manson Active Listings (Unincorporated) – January 2020: AirBnB and Home Away



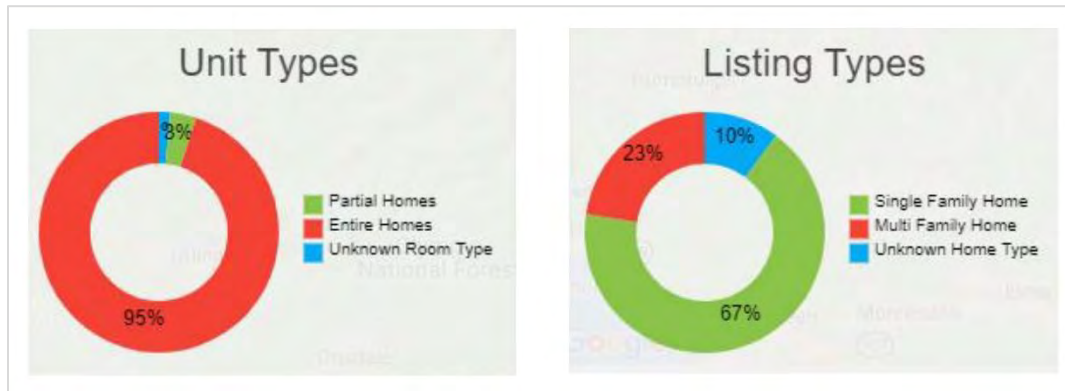
Note: Geographic location is accurate for most properties with some locations within 500 meters for privacy.
Sources: Chelan County Assessor; AirDNA February 2020; BERK 2020

2.3 SHORT-TERM RENTAL CHARACTERISTICS

2.3.1 Full versus Partial Unit Rentals

Most short-term rentals are offered as entire homes, and most are single-family in format. See Exhibit 8.

Exhibit 8. Countywide Unincorporated Areas All Short-Term Rental Platforms March 2020



Source: Host Compliance 2020

Exhibit 9 provides a more specific breakdown of unit types by zip code in unincorporated Chelan County. Most units are entire homes or apartments.

**Exhibit 9. Approximate Type and Number of AirBnB and HomeAway Listings:
January 2020 Monthly Data Unincorporated Chelan County***

| Zip Code | Zip Code Place Name | Entire Home/Apt | Hotel Room | Private Room | Shared Room | Grand Total |
|--------------------|---------------------|-----------------|------------|--------------|-------------|--------------|
| 98815 | Cashmere | 24 | | 8 | | 32 |
| 98816 | Chelan | 68 | | 2 | | 70 |
| 98822 | Entiat | 2 | | | | 2 |
| 98826 | Leavenworth | 756 | | 55 | | 811 |
| 98828 | Malaga | 4 | | | | 4 |
| 98831 | Manson** | 211 | 6 | 3 | 1 | 221 |
| 98847 | Peshastin | 51 | | 3 | | 54 |
| 98801 | Wenatchee | 32 | | 11 | | 43 |
| Grand Total | | 1,148 | 6 | 82 | 1 | 1,237 |

Note: * Monthly active listing data produces slightly fewer full short-term rental units than property-based data which reports 1,247.

**Includes about 83 short-term rentals on tribal land.

Sources: AirDNA February 2020; BERK 2020

See Attachment B for more details about unit types. About 25 units are “guest houses” and 13 are “tiny houses”, mostly found in the Leavenworth zip code.

2.3.2 Rental Rate and Income

The median nightly rate is \$216 across all listings identified by Host Compliance (2,376 listings, representing 1,535 unique rental units). By zip code in unincorporated areas, the rates are higher in Chelan, Manson, and Leavenworth. The units tend to be larger in these areas too. The average days available is over 3 months to almost 5 months. The occupancy rate in the most active areas is under 50%. See Exhibit 10.

**Exhibit 10. Unincorporated Chelan County Entire Home/Apartment – January 2020:
AirBnB and HomeAway Listings Property Data**

| Zip Code Place | Count of Properties | Average of Bedrooms | Average of Number of Bookings LTM | Average of Count Available Days LTM | Average of Occupancy Rate LTM | Average of Annual Revenue LTM | Average of Published Nightly Rate |
|--------------------|---------------------|---------------------|-----------------------------------|-------------------------------------|-------------------------------|-------------------------------|-----------------------------------|
| Cashmere | 28 | 2.0 | 42 | 91 | 52% | \$23,147 | \$166 |
| Chelan | 97 | 3.2 | 25 | 120 | 44% | \$37,984 | \$360 |
| Entiat | 4 | 1.0 | 21 | 110 | 43% | \$11,586 | \$131 |
| Leavenworth | 749 | 2.7 | 46 | 144 | 48% | \$44,138 | \$263 |
| Malaga | 5 | 1.8 | 50 | 130 | 57% | \$23,626 | \$141 |
| Manson* | 281 | 3.3 | 27 | 122 | 46% | \$39,777 | \$316 |
| Peshastin | 53 | 2.8 | 39 | 139 | 42% | \$29,878 | \$253 |
| Wenatchee | 30 | 2.6 | 29 | 97 | 55% | \$27,957 | \$247 |
| Grand Total | 1,247** | 2.8 | 39 | 135 | 47% | \$41,029 | \$278 |

Notes: *Includes housing on Wapato - about 83 in Manson

**Slightly different counts of entire units comparing property based data to monthly rental data.

Acronym – LTM = last 12 months

2.4 HOUSING STOCK

The highest share of total dwellings used for short-term rentals is within Leavenworth and Manson zip codes. See Exhibit 11.

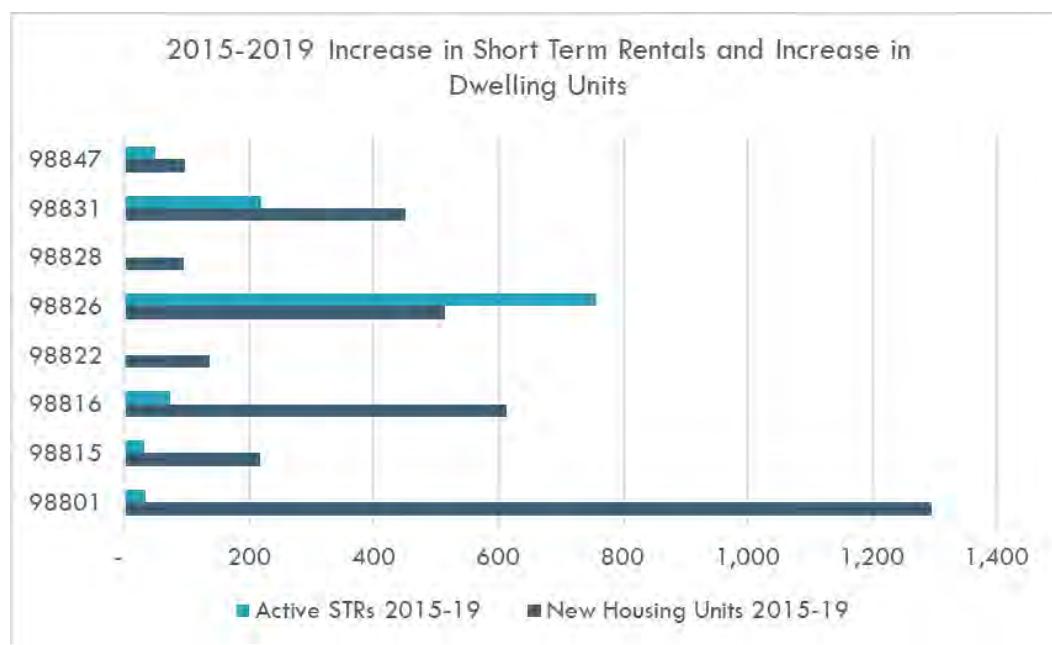
Exhibit 11. Unincorporated Chelan County Short-Term Rentals as Share of Total Housing Units

| Zip Code Community Name | Zip Code | Total Dwellings Unincorporated 2019 | January 2020 Active short-term rentals | % short-term rentals |
|-------------------------------|----------|--|--|----------------------|
| Leavenworth | 98826 | 6,099 | 749 | 12.3% |
| Manson | 98831 | 2,519 | 281 | 11.2% |
| Chelan | 98816 | 5,333 | 97 | 1.8% |
| Peshastin | 98847 | 956 | 53 | 5.5% |
| Wenatchee | 98801 | 17,989 | 30 | 0.2% |
| Cashmere | 98815 | 2,977 | 28 | 0.9% |
| Malaga | 98828 | 908 | 5 | 0.6% |
| Entiat | 98822 | 1,138 | 4 | 0.4% |
| Total | | 37,920 | 1,247* | |

Notes: *Slightly different counts of entire units comparing property based data to monthly rental data (10 units less).
Sources: AirDNA February 2020; BERK 2020

In some places recently added housing stock is less than the number of short-term rentals added. Short-term rentals can occur in existing dwellings as well as new ones. The use of short-term rentals by a homeowner can provide income to support the housing costs, but it can also remove a unit otherwise available for rent from the market place.

Exhibit 12. Increase in Dwellings and Short-Term Rentals in Unincorporated Areas by Zip Code 2015-2019: AirBnB and HomeAway Listings*



Note: property based data is slightly higher than monthly rental data by 10 units.

Source: OFM 2019; AirDNA 2020

3 Community Input

In 2019, the Chelan County Department of Community Development prepared draft code language for regulating short-term rentals across unincorporated Chelan County whereas currently it is only regulated in the Manson Urban Growth Area. Generally, the proposal included allowing short-term rentals in rural residential zones and conditionally permitting them in resource zones. In the Peshastin UGA the short-term rentals would be conditionally permitted, and in the Manson UGA, retained with current permit allowances.

The draft code was heard by the Planning Commission and Board of County Commissioners and denied due to concerns raised by public input; also County Commissioners wanted to review alternative proposals. Through that process comments through about 215 commenters were logged between July and September 2019. BERK Consulting, Inc. reviewed the comments and developed a summary of comment themes.

Attachment C provides a comment matrix from public input in fall 2019 on the prior proposal that was denied. Since that time, the public provided input to County staff and commissioners, and input received as of March 11, 2020 are in Attachment D.

3.1 PUBLIC INPUT – FALL 2019

About 38% of the 215 commenters support short-term rental regulations, written as is or with conditions, while about 57% did not support the proposed regulations, which tended to include owners/operators of short-term rentals. Another 5% had comments that did not relate to support or opposition.

Most comments did not specify a location of concern or were inclusive of all short-term rentals in the county while 24% were specific to existing UGAs or “second home” communities.

In order of magnitude, the issues raised relate to enforcement; nuisance and utility concerns; health and safety; affordable housing and residential character; occupancy limits; density (of ownership or by location); and treating short-term rentals as businesses.

Respondents who support the regulations as is or with conditions generally did not identify themselves as an owner or operator of short-term rentals. This group wants to reduce overcrowding through occupancy or density limits, regulate nuisance and safety issues (such as noise, garbage, septic capacity, and wildfire risk), and maintain the character of residential neighborhoods.

Most respondents who oppose the regulations identified as owners or operators of short-term rentals. This group thinks the County should better and more consistently enforce current codes and laws instead of imposing additional regulations. They feel proposed occupancy limits are overly restrictive and would be too hard to regulate, that owners should not be punished for guests’ bad behavior, and that the “3 Strike Rule” would be used as a retaliatory tactic for disputes between neighbors.

Both groups wanted clarity concerning how the County would enforce and manage regulations if enacted, especially concerning occupancy and the 3 Strike Rule.

3.2 ADDITIONAL INPUT EARLY 2020

Comments fielded by County Commissioners or County staff early in 2020 are attached. The concerns are similar to those provided by the public in 2019.

For example, a resident in Plain indicated short-term rentals should be well regulated and limited to avoid nuisances and respect community cohesion. Additionally there are concerns about loss of affordable housing.

3.3 COMMENT THEMES

3.3.1.1 *Theme: Enforcement and clear processes are important parts of managing short-term rentals in the county.*

- **Enforcement.** Enforcement is a common concern regardless of whether respondents are for or against regulation. A number of respondents who own or operate short-term rentals (especially in the Leavenworth area) are opposed to short-term rental regulations, instead supporting stricter and more consistent enforcement of existing regulations. Others who support the regulations think clearer countywide regulations will help ensure compliance, but that strict enforcement is the only way to add consequence to valid violations.
- **3 Strike Rule.** Support for the “3 Strike Rule” is mixed. Some see the measure as the only way to manage properties that repeatedly violate the law. Others are worried neighbors will log unwarranted complaints to try and shut down legal short-term rentals, or that the rule will be used as a retaliatory tactic for disputes between neighbors. Some against the rule believe a fine should be imposed on the renter for bad behavior and not the owner. Both sides want clarity concerning how the County would enforce and manage the policy.
- **Complaint process.** Many are confused on how the County will record and register complaints to determine violations. Some requested a 24/7 hotline to log complaints, with many simply not knowing who to contact. Some want the ability to text a hotline number so they can better document violations with pictures or video.
- **Off-site managers.** Several of the nuisance related comments discussed below are specific to properties with off-site managers (regardless of whether the manager is local or out-of-area). Respondents cite unresponsive property managers, and suggest requiring on-site caretakers (similar to the City of Leavenworth) to help mitigate common problems. Some ask that if property managers are used, the property manager should be identified in the permit application and in a management plan.

Some other less common enforcement and process comment themes include:

- **Conditional Use Permits (CUP).** Some believe CUPs should be required for all short-term rentals in residential zones regardless of unit size (a few believe they should be required in all zones). Several respondents question why small short-term rentals would be permitted outright with standards and larger rentals would require CUP. In general, commenters feel the CUP should not pass on with the sale of the property. One commenter wonders why permits and home inspections would be required annually when a CUP is only required once.
- **Registration fee.** A few respondents believe the \$500 annual fee is too high – especially for on-site owners with smaller units or only one unit – instead wanting an annual registration fee based on the number of bedrooms or not fee at all.
- **Create a register of short-term rental properties.** Some want an online registry of short-term rental properties in the county made accessible.
- **Posted notice.** A few commenters want to ensure short-term rental permit numbers are properly

posted outside and contain all pertinent information, and that neighbors are appropriately notified.

- **Consistency.** Some believe regulations should consistently apply to all properties in the county regardless of size or location (see CUP discussion above).

3.3.1.2 *Theme: Regulations should address common nuisance impacts, such as reckless driving, street parking, noise, trespassing, and excessive trash.*

- **Parking and reckless driving.** Most vehicle related comments concern parking – supporters want short-term rentals to supply adequate parking to help limit street parking on county or residential roads. A few respondents suggest holding short-term rentals to the same parking requirements as bed and breakfasts. Traffic, speeding vehicles in residential neighborhoods, and winter driving are other cited concerns – for example, out-of-town guests with limited winter driving experience sometimes cause problems for local residents, either getting stuck in the snow or driving too fast for conditions.
- **Noise and parties.** Loud or excessive partying is a common concern expressed by respondents, including music, public urination, and vulgar imagery and profanity. Several respondents want stronger noise regulations with clear guidelines on how noise complaints will be addressed – despite adequate response from law enforcement, for example, the fact remains that individuals were still disturbed late at night.
- **Trespassing and privacy.** A few commenters cite personal experience with short-term rental guests trespassing on their property.

3.3.1.3 *Theme: Short term rentals place increased pressure on septic systems and other utilities.*

- **Garbage.** Many respondents note that garbage cans are often left curbside indefinitely at short-term rental properties, which commenters said is both unattractive and unsafe as it attracts wildlife. Respondents would like to make sure garbage is properly disposed of, regularly taken out/picked up following rentals, and stored in such a way that is attractive and protected from wildlife.
- **Capacity concerns.** Utility related comments primarily involve adequate capacity to serve the volume of people staying, with specific concern for septic and water capacity issues. A few believe capacity issues should already be addressed through the building permit process, while several others are concerned the actual volume of renters overwhelms systems built for fewer people (e.g., some respondents cite substantial odors coming from overburdened septic systems).

3.3.1.4 *Theme: Regulations should incorporate public health and safety.*

- **Fire risk and burn bans.** Safety concerns raised primarily relate to wildfire risk and guests not adhering to burn bans. Many respondents cite personal experience with guests who either outright ignore burn bans or who do not know how to responsibly contain campfires in dry conditions – one respondent suggests adding that “portable fireplaces/pits must be locked when burn ban is in effect” to the proposed code. The Forest Ridge Wildfire Coalition questions short-term rental code compliance and the response of local representatives to address wildfire danger characteristics of the region. Several want to know if sprinklers or other fire suppression would be required for larger units (especially older units that would need expensive retrofitting to comply) or if owners would be required to enforce other special fire code requirements.
- **Hot tubs/pools.** Several respondents want regulations to ensure hot tubs and pools are properly

fenced off and meet (and are subject to) Health Department regulations to ensure the safety of guests. In addition, several respondents want only those staying as registered guests of the rental allowed to use the rental's hot tubs or pools.

- **Law enforcement calls for service.** The Chelan County Sheriff notes there appear to be fewer logged complaints related to short-term rentals than hotel guests or long term residences in Chelan County. A few other comments question the need for short-term rental regulations because existing laws already handle the limited number of situational complaints. A few others believe the geographic spread of short-term rentals throughout the county makes it hard for law enforcement to respond quickly.

3.3.1.5 *Theme: Too many short-term rentals negatively impacts housing affordability, lowers the supply of housing for long term renters and owners, and is incompatible with residential community character.*

- **Affordability and supply.** Increased housing costs and lack of supply are often cited by those wanting regulation – respondents believe too many short-term rentals in residential neighborhoods raise local property prices and lower available housing for long term renters and homeowners. A few respondents, for example, believe the County's Comprehensive Plan did not adequately account for long term housing lost to short-term rentals when considering 20 year capacity (and therefore does not adequately meet GMA goals of preserving housing stock). Several comments note that short-term rental supply vastly outweigh the supply of long term rentals, which impacts the ability for people to live in areas impacted by the tourism. A group of local business leaders in the Leavenworth area, for example, believe employees are regularly unable to find affordable housing nearby, negatively impacting both the employees and business owners. One comment suggests a tax on short-term rentals could be used to build infrastructure and community amenities.
- **Community character.** Many commenters who support regulation want to maintain the residential character of neighborhoods in Chelan County and want the code to preserve the integrity of residential zoning. They believe short-term rentals are either a commercial use that is not compatible with residential communities or that too many short-term rentals dramatically changes the feel of a neighborhood (see the density discussion below).
- **Non-resident owners.** Some respondents want the County to restrict and limit short-term rentals by non-resident owners as a way of maintaining residential character.

3.3.1.6 *Theme: Respondents are divided over whether short-term rental regulations should include occupancy limits or limit the number of bedrooms.*

- **Support occupancy limits.** Many respondents who support the short-term rental regulations do so specifically because they want enforceable occupancy limits to help reduce overcrowding – these respondents generally do not identify themselves as owners or operators of short-term rentals. Some suggest a maximum occupancy of 10 guest (including children), with a few suggesting the cap could be greater in commercial zones. Comments support limiting sleeping capacity instead of the number of bedrooms, as the number of bedrooms don't necessarily reflect the number of guests that can stay at a short-term rental. Other suggested alternatives include considering a home's overall square footage or the capacity listed on building permits or of septic systems as methods of determining occupancy limits. Another alternative suggests limiting the number of nights per year a short-term rental can be rented.

- **Oppose occupancy limits.** Respondents who do not want occupancy limits are typically owners or operators of short-term rentals who oppose regulation. Most believe the occupancy limits are too restrictive and will be impossible to regulate. Some say occupancy limits would negatively impact their rental income. A few think young children should not be included in the calculations if limits are imposed.

3.3.1.7 *Theme: Limit the density of short-term rentals by zone and/or limit the number one person or entity is allowed to own in the county.*

- **Density by zone/neighborhood.** Many respondents who support short-term rental regulations do so specifically because they want to reduce the density of short-term rentals in residential neighborhoods. Respondents note that the draft code addresses density per lot but not density per neighborhood or zone. A few respondents want short-term rentals excluded from all residential zones as they believe the rentals are incompatible with residential uses. See the discussion of residential character above.
- **Limit number owned.** Some believe no person or entity should be allowed to own more than one short-term rental in the county to help keep properties in compliance with residential zoning.

3.3.1.8 *Theme: Short term rentals are a business and should be regulated like a business.*

- **Hotel/motel regulations.** Some respondents who want regulation believe short-term rentals should be required to adhere to the same standards as hotels, motels, and bed and breakfasts to ensure fair competition – there was concern, for example, that an owner of a condominium or apartment building would be able to operate it like a hotel without following the same rules that a hotel operator must follow. A few comments noted that hotels and motels are not permitted in residential areas yet short-term rental properties operating like hotels and motels are.
- **Economic impact.** Some who oppose short-term rental regulation think regulation will negatively impact the economic benefit short-term rentals bring to both the owner (rental fees) and local community (tourism and jobs). Others, however, believe a lack of affordable housing for employees is already negatively impacting local businesses. Both sides appear to believe most short-term rentals are no longer supplemental income for property owners but a primary source of income for business owners in residential areas.
- **Insurance.** A few comments noted that those operating a short-term rental should carry commercial or liability insurance as home-owners insurance is often null and void (or very difficult for neighboring properties to pursue restitution through). Comments suggested proof of insurance be required with registration.

3.4 COMMUNITY PROPOSALS EARLY 2020

After the public comments described above through the prior code review process, the public continued to provide input to County staff and commissioners and it is summarized below.

3.4.1 Manson Community Council

The Manson Community Council provided options and relayed some concerns as described in Attachment D. A summary of their proposals include:

- **Location:** Prefer short-term rentals be located in commercial zones; limit in UR1 and planned developments.
- **Limits on Number:** Would like to see a 500-foot separation. New construction for a single-family home building permit cannot be used as a short-term rental for 5 years [to] encourage community cohesiveness and good neighborhood... Current short-term rental permits are not transferable if the property is sold. New owners must reapply for a new short-term rentals Permit.
- **Occupancy:** Limit of 10 people or fewer; including children of all ages. Maximum of 4 bedrooms in residential zones. Five bedrooms or more are not allowed in residential zones, only in commercially zoned areas.
- **Other Standards:** Sign must be posted outside the entrance of home by that includes: Permit number, expiration date, maximum occupancy, name & phone number of person to contact in case of problems. Response time for complaints must be within 30 minutes. Short-term rentals should honor and maintain the character of surrounding neighborhoods.
- **Process/Fees/Enforcement:** Property registration fees should be figured on a sliding scale of a "per bedroom" fee. Larger properties are harder to mitigate and take more resources.

3.4.2 Peshastin Community Council

Based on a conference call with three members of the Community Council, County Community Development staff, and the Consultant summary comments about preferences for regulation were provided. A focus was on meeting the intent of the Peshastin UGA Comprehensive Plan, and recognizing short-term rentals are a business. Thoughts on location and limits/process included:

- **Location:** Allow short-term rentals where hotels/motels and bed and breakfasts are allowed. Do not allow in residential zones.
- **Limits on Number/Occupancy/Process:** Units should be owner occupied and require a conditional use permit. There will be nonconforming units (which may be vested).

3.4.3 City of Leavenworth

City of Leavenworth Development Services Manager Lilith Vespier reviewed some initial proposals from County Commissioner Bob Bugert; these proposals are described further below). City staff thoughts included:

- **Location:** Consider allowing short-term rentals in accessory dwelling units, since this is an efficient use of a separate space and retains one local resident per parcel.
- **Limits on Number:** 1% cap – if tied to January 1st, the number will change year to year and result in confusion and lack of certainty. Consider permitting all who apply in the first 6-12 months and reducing that number by xx% per year to reduce the total or a specific number per region (like Lake Chelan) or other options.
- **Occupancy:** If proposing two overnight guests per bedroom plus additional three overnight guests, this could encourage the use of other rooms for beds which in turn impacts the septic, noise, and neighborhood character.

- **Other Standards:** Inspections could be streamlined by just having the Fire District if the only purpose of the Chelan-Douglas Health District is to confirm bedrooms in relation to septic size. Have parking related to the number of sleeping units and not +one. If retaining the + one, it would encourage use of other rooms for beds and discourage carpooling. Signage could be limited sufficiently by size and colors and not natural material. Continue to have sheriff regulate conduct. If requiring a designated local property representative who lives within 30 minutes, this removes remote rentals which are the types of rentals with the least impact – no or remote neighbors.
- **Process/Fees/Enforcement:** Certify compliance with the conditions of license approval within 90 days after the closing date of the sale of the property would be difficult to enforce. These should be treated the same as a conditional use permit which runs with the land and anyone operating would need to comply with the conditions. This removes the potential for loss of an approved short term rental with the sale (affecting the sale value). All complaints should go only to code compliance officer will improve accountability and follow through. The State has identified and provided remedy for enforcement through the RCW; how to address the County objectives and processes with the RCW?

3.4.4 Dan Beardslee

- **Location:** Permitted use in all rural, residential, and resource zones.
- **Limits on Number:** None.
- **Occupancy:** Shall not exceed two persons per bedroom, plus four, provided that the standards of the Chelan-Douglas Health district and the Chelan County Fire Marshal are met.
- **Other Standards:** Follow RCW 64.37 which addresses owner contact information, installation of carbon monoxide alarms, provision of consumer safety requirements, and enforcement via a warning letter and potential for civil infraction.
- **Process/Fees/Enforcement:** Valid short-term rental registration required; annual renewal required. Transferable to a new owner; 60 days to update owner and contact information.

3.4.5 County Commissioner Proposed Conditions January 2020

To discuss with community councils and citizens, members of the Board of County Commissioners developed proposed conditions. These conditions are a supplement to the Washington State Statute on vacation rentals (RCW 64.37), which are to be adopted by reference. The draft code provided by Dan Beardslee above should be a foundation.

- **Location:** Unincorporated areas of the county. Vacation rentals must be operated out of a person's primary residence only. Accessory dwelling units, recreational vehicles, tents and other secondary housing units cannot be operated as Vacation Rentals. A Vacation Rental Permit is not automatically transferable as part of the sale of property; a permit application from the new property owner must be approved to continue as a vacation rental.
- **Limits on Number:** The annual number of new vacation rental licenses issued will be capped to 1% of the total number of licensed vacation rentals as of January 1 of each year. Once the maximum

number of vacation rental licenses has been reached, no additional licenses will be issued for that year. These licenses will be issued on a first-come, first-serve basis.

- **Occupancy:** Advertised lodging will have no more than two overnight guests per bedroom plus additional three overnight guests at any one time. The number of bedrooms is determined by the approved building permit for the structure. A guest is a person over six years of age.
- **Other Standards:** Vacation rentals must maintain an up-to-date property management plan on file with the Chelan County Community Development Department and property owners within 300 feet of the building within which the vacation rental is located. A designated local property representative who lives within 30 minutes of where the Vacation Rental is located and will respond to complaints and emergencies within that time frame. Reference the existing codes for trash, trespassing, noise, and outdoor burning. Trash and recycling cans on the right-of-way are to be set out and removed within twenty-four hours of pickup. All vacation rental license holders are required to display the address of the residence so that it is clearly visible from the street or access road. The house must have a sign or other identifier on outside as vacation rental. The sign must be made of natural materials not exceeding two square feet in area and if illuminated, shall be indirectly illuminated.
- **Process/Fees/Enforcement:** There must be an annual rental permit. Vacation rental owners must annually certify compliance with the conditions of permit approval and with the fire and life safety requirements of the International Fire Code. Vacation rentals must meet all applicable local and state regulations, including business licenses and taxes such as Washington State sales, lodging and business and occupation taxes. The Chelan-Douglas Health Department and Chelan County Fire Marshall must inspect the vacation rental to secure a license from Chelan County. The Chelan County License is revoked for one year after three complaints are filed against a particular vacation rental.

4 Regulatory Approaches and Options

4.1 LEGAL FRAMEWORK AND BEST PRACTICES

The County regulates land use and development in unincorporated areas including unincorporated UGAs and rural/resource areas. Cities address land use in city limits. Through inter-local agreements Chelan County can opt to apply city regulations in unincorporated UGAs associated with cities.

In developing land use regulations, Chelan County considers its authorities under the Growth Management Act (RCW 36.70A) which allows the County to regulate land use and development like short-term rentals, and other statutes governing taxation, health and safety, and enforcement (for example, RCW 64.37, Short-Term Rentals). Additionally, the County can consider best practices that fit within the state legal frameworks.

The [Sustainable Economies Law Center \(March 2016\)](#) developed a guidebook for regulating short term rentals, recommending local governments:

- **Establish clear definitions:** Distinguish short-term rentals from long-term rentals and qualities of short-term rentals that differ from hotels, motels, boarding house, or bed and breakfast. Address

whether the unit is the host's primary residence, and whether the unit is occupied during a guest's stay.

- **Require registration and recordkeeping:** Require registration and registration renewal with fees and keep them low as possible (address administration costs and factor in addressing complaints and enforcement). (Note: for counties, an equivalent process could be a land use permit that is renewable.) Require hosts to keep records of guest names and contact information and revenue earned to assist with enforcement. Require the hosts to include the short-term rental registration number or permit number on all advertisements.
- **Establish protections for the supply and affordability of housing:** The guidebook notes that short-term rentals can increase housing costs by removing from the market a room that could have gone to a long-term tenant, and by raising the cost for prevailing housing prices. A municipality can set caps on the number of allowed short-term rentals per host (e.g. Seattle, Okanogan-Methow), and the number of nights a short-term rental can be rented to guests (e.g. Cannon Beach and Bend). To prevent speculation, the guidebook recommends limiting short-term rentals to the primary residence. The recommendations also include ordinance requiring occupancy for a period of time prior to the unit being offered for short-term rental.
- **Create protections for the wellbeing of guests:** Provide for health and safety standards, inspections by fire and building officials or a self-checklist, and insurance carried by short-term rental hosts.
- **Establish oversight, complaint, and sanction procedures for the wellbeing of neighbors:** Create a process for filing complaints, and fines or other sanctions.
- **Preserve neighborhood quality:** Maintain a neighborhood feeling with limitations on parties, manage parking, and establish quiet hours.
- **Preserve public tax revenues and level the playing field between short-term rentals and commercial hotels:** short-term rentals should be charged a transit occupancy tax or hotel tax. A third-party facilitator should collect and remit the tax.

Locally, [MRSC \(November 2017\)](#) has noted common concerns addressed in codes in Washington State and the Pacific Northwest include:

- **Collection** of lodging and sales tax on these short-term rental stays;
- **Mitigation** of traffic, parking, noise, and other impacts on the surrounding neighborhood;
- **Compliance with life/safety standards** that are commonly applied to other types of lodging establishments (such as hotels, motels, and bed-and-breakfasts); and
- Addressing impact of short-term rentals on a community's **affordable housing supply**.

Jurisdictions have developed regulations addressing many of the best practices and concerns above. See Attachment A for a matrix of regulations from counties in Washington as well as cities in Washington and Oregon. See Attachment A. Highlights include:

- Many regulate short-term rentals by zones and may treat them differently depending on location and others allow them where single-family units are allowed though permits may vary length of time allowed in residential zones.

- Most communities have defined different levels of short-term rentals regulating whole homes and room rentals differently by permit type and by zone.
- Many vary requirements based on whether the host lives in the home and how many days per year the unit is rented.
- Some have instituted limits on the numbers of short-term rentals based on distance such as Bend. Cannon Beach instituted a lottery for years but in 2019 removed it and has a committee studying the effects of short-term rentals on the community; they have defined permits by length of rentals.
- Some limit the number of occupants.
- All address parking. Many address solid waste, noise, signage, and health and safety. Many require annual checklists for fire and safety, and acknowledgement of Good Neighbor Guidelines.
- Most require a local representative to live in proximity to the community.
- Some regulate short-term rentals with land use permits; many offer licenses with annual renewals. However, counties in Washington State tend to regulate by land use permit rather than license. Most ordinances specify the state or local taxes that must be paid.
- Several require inspections at the time the short-term rentals application is approved, and many require regular inspections or self-checklists after that. Some only inspect upon complaint.

4.2 OPTIONS

Considering the public input and proposals a range of options have been developed for the following factors listed below with more detailed options listed in Exhibit 13:

- Zones Allowed
- Unit Types
- Limits on Numbers
- Occupancy
- Standards
- Permits, Inspections, and Enforcement

Exhibit 13. Summary of Options Examined

| Topic | Options Evaluated |
|---------------|---|
| Zones Allowed | <ul style="list-style-type: none"> ▪ Vacation Rentals with permits of different lengths – accessory use and lesser days lengths in rural residential zones; permitted in commercial zones ▪ Vacation Rentals with 1% cap – permitted in rural residential and commercial zones, conditionally permitted in resource zones, limited by county or area cap ▪ Vacation Rentals Peshastin or Manson UGAs – limited to existing in residential zones and new ones in commercial zones |

| Topic | Options Evaluated |
|---------------------------------------|--|
| Unit Types | <ul style="list-style-type: none"> Allow short-term rentals within a person's primary residence only. Permit is not transferable to new owner. Allow within either primary residence or accessory dwelling units, recreational vehicles, tents and other secondary housing units. Permit is transferable to new owner. |
| Limits on Numbers | <ul style="list-style-type: none"> Cap the number of short-term rentals, countywide or by area (e.g. UGA versus non-UGA area), e.g. 1%. Establish distance/separation requirements. Establish permit authorizations of different lengths. |
| Occupancy | <ul style="list-style-type: none"> Relate occupants to bedrooms; allow limited occupancy in common areas. Cap at a flat number of guests, e.g. 10 per International Residential Code. |
| Standards for health and safety | <ul style="list-style-type: none"> Follow RCW standards only. Tailored to local conditions and needs. Combination. |
| Permits, Inspections, and Enforcement | <p>Consider all together:</p> <ul style="list-style-type: none"> Require an annual land use permit. Initial permit should require inspections or review by Fire District and Health District. Set permit fees based on cost of permit review and inspection. Allow owners to provide affidavit of compliance on renewals. Enforce based on consistency with RCW 64.37.030 and Chelan County Title 16. <p>(Note RCW 64.37.030 references RCW 7.80; and 7.80.010 indicates a county can hear and determine civil infractions pursuant to its own system established by ordinance.)</p> |

4.2.1 Zones Allowed

Some examples allow short-term rentals in any zone where single-family homes are permitted (Clallam, Jefferson, and Pierce Counties and Cannon Beach, OR) while others vary regulations by zones (Okanogan and San Juan Counties, and Bend, OR). Options include:

- Regulate short-term rentals similarly across the County in all zones allowing single-family residences and tourist accommodations.
 - Pros: Simpler enforcement of uniform zoning regulations.
 - Cons: Less recognition of different community characters and market and housing conditions.
- Regulate short-term rentals differently by zone or community. Regulations could differ in the Manson UGA, Peshastin UGA, or assigned City UGAs (e.g. authorizing local cities regulations per interlocal

agreements). Rural areas could have a more uniform approach, except the allowances could be more flexible where zones recognize long-standing resort or second home communities, or less flexible on resource lands to avoid conversion or cessation of resource activity.

- a. Pros: Ability to recognize community character across large county. Adapt regulations to consider tourist-based economies. Tailor regulations to address affordable housing concerns in local areas.
- b. Cons: Complexity of regulations and enforcement.

Recommendation: Option 2 would be more responsive to different community concerns and needs.

4.2.1.1 Urban Unincorporated Areas – Code Options:

- Vary short-term rentals within the by Manson UGA and Peshastin UGA. Recognize local characters, housing markets, and local economies. The County Comprehensive Plan and zoning code already distinguishes these communities with subarea plans and area-specific zones. Allowances could vary by zone. Options include:
 - UGA-1. Allow short-term rentals in residential zones as an accessory use with permits that allow limited use annually so that a primary resident is in the home majority of year; and permit short-term rentals outright in commercial uses.
 - UGA-2. Allow short-term rentals in residential zones and commercial zones. Assume 1% cap above existing number will limit level of use/change in neighborhoods.
 - UGA-3. Match community preferences. The focus is to allow short-term rentals in commercial areas. Existing short-term rentals would be grandfathered and could continue but if discontinued could not be re-established.
- Consider application of city regulations in assigned UGAs where short-term rentals are prevalent, e.g. Leavenworth and Chelan, and likely to result in nonconformities if areas are annexed. City regulations could be phased in after the County launches its countywide program before introducing more complexity. Until then, the County could restrict added short-term rentals in assigned UGAs (see cap below).

4.2.1.1.1 Peshastin Section 11.22.030

Note: Selected uses shown on chart due to similarity of uses and to provide context.

(2) The following acronyms apply to the following use chart:

Uses:

PRM = Permitted use

ACC = Accessory use

CUP = Conditional use

EL = Existing Legal are Permitted; new ones are not permitted

Where a cell is empty, the use is prohibited in that zone. All of these assume compliance with any and all development standards.

| Land Uses | R-1 | R-2 | R-3 | C-D | C-H | I | I-C | P-U |
|-------------------------|-----|-----|-----|-----|-----|---|-----|-----|
| RESIDENTIAL USES | | | | | | | | |

| Land Uses | R-1 | R-2 | R-3 | C-D | C-H | I | I-C | P-U |
|---|------------|------------|------------|------------------------|------------------------|-----|-----|-----|
| Bed and Breakfast | CUP | CUP | CUP | PRM ¹ | PRM ¹ | | | |
| Boarding/Lodging House | PRM | PRM | PRM | CUP | PRM | PRM | | |
| Multifamily Dwelling | | PRM | PRM | PRM | PRM | | CUP | |
| Single-Family Dwelling | PRM | PRM | PRM | | | | | |
| Existing Single-Family Dwelling as of July 1, 2008 | | | | PRM | PRM | | | |
| Hotels/Motels | | | | PRM | PRM | PRM | PRM | |
| Winery, Small Scale | ACC | CUP | ACC | PRM | PRM | PRM | PRM | |
| <u>Option UGA-1: Vacation Rentals (with permits of different lengths)</u> | <u>ACC</u> | <u>ACC</u> | <u>ACC</u> | <u>PRM¹</u> | <u>PRM¹</u> | | | |
| <u>Option UGA-2: Vacation Rentals (with 1% cap)</u> | <u>PRM</u> | <u>PRM</u> | <u>PRM</u> | <u>PRM¹</u> | <u>PRM¹</u> | | | |
| <u>Option UGA-3: Vacation Rentals Peshastin Community</u> | <u>EL</u> | <u>EL</u> | <u>EL</u> | <u>PRM</u> | <u>PRM</u> | | | |

¹ In existing single-family residences only, as of July 1, 2008.

² Indoor facility only.

4.2.1.1.2 Manson Section 11.23.030

Note: Selected uses shown on chart due to similarity of uses and to provide context.

| | |
|-----|---|
| P | Permitted use—Subject to development standards in Chapter 11.88 and/or 11.93 |
| EL | Existing Legal uses are permitted; new ones are not permitted |
| A | Accessory use—Subject to development standards in Chapter 11.88 and/or 11.93 |
| CUP | Conditional use permit—Subject to development standards in Chapter 11.93 and/or within this chapter |

Table 9.1 – District Use Chart

| USE/ACTIVITY | UR1 | UR2 | UR3 | CT | CD | MLI | UP |
|--|-----|-----|-----|----|----|-----|----|
| Recreation/Tourist Uses | | | | P | | | |
| Bed and Breakfast (3 or Fewer Rooms) | A | A | A | | P | | |
| Guest Inn—4 to 6 Rooms | | | CUP | | P | | |
| Home-Based Business | | | | | | | |
| Home Occupations | A | A | A | | | | |
| Multifamily Dwellings (Apartments) | | | P | | | | |
| Residential Dwelling Units, Above Ground Floor | | | | A | P | A | |
| Boarding House | P | P | P | | | | |
| Single-Family Dwelling | P | P | P | | | | |

| USE/ACTIVITY | UR1 | UR2 | UR3 | CT | CD | MLI | UP |
|---|------------------------------------|------------------------------------|------------------------------------|-----------------------------------|-----------------------------------|-----|----|
| Single-Family Dwelling, as of December 31, 2017, excluding parcels adjacent to Wapato Way | | | | P ¹ | P ¹ | | |
| Farm Visit, U-Pick and Rent-A-Tree Operation | P | P | P | | | | |
| Winery Less Than 1,500 sq. ft. of Retail Space | | | | P | P | P | |
| Winery Greater Than 1,500 sq. ft. of Retail Space | | | | P | P | P | |
| <u>Option UGA-1: Vacation Rentals (with permits of different lengths)</u> | <u>A¹</u> | <u>A¹</u> | <u>A¹</u> | <u>P¹</u> | <u>P¹</u> | | |
| <u>Option UGA-2: Vacation Rentals (with 1% cap)</u> | <u>P¹</u> | <u>P¹</u> | <u>P¹</u> | <u>P¹</u> | <u>P¹</u> | | |
| <u>Option UGA-3: Vacation Rentals – Manson Community</u> | <u>P¹EL¹</u> | <u>EL¹P¹</u> | <u>EL¹P¹</u> | <u>P¹A⁺</u> | <u>P¹A⁺</u> | | |

P¹ = Permitted with Standards

4.2.1.2 Rural and Resource Areas – Code Options:

Note: Selected uses shown on chart due to similarity of uses and to provide context.

- Rural Option-1. Allow as an accessory use to the primary occupancy of the home in rural residential and resource zones and permit in rural commercial zones. This is allowed with permits of different lengths (longer in RW, RRR, RC and shorter in others). See “Limits on Numbers.”
- Rural Option-2. Permit short-term rentals in rural zones and conditionally permit in resource zones. This is combined with a permit cap. See “Limits on Numbers.”

11.04.020 District Use Chart

| USE/ACTIVITY | RR20 | RR10 | RR5 | RR2.5 | RW | RRR | RV | RC | RI | RP | AC | FC | MC |
|--|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|------|-----|-------------|-------------|-------------|
| Recreation/Tourist Uses | CUP | CUP | CUP | CUP | CUP | CUP | CUP | CUP | | CUP | CUP | CUP | |
| Bed and Breakfast (3 or Fewer Rooms) | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | | | | A(1) | A(1) | |
| Guest Inn—4 to 6 Rooms | CUP | CUP | CUP | CUP | CUP | CUP | CUP | | | | CUP | | |
| Home-Based Business | CUP | CUP | CUP | CUP | CUP | CUP | CUP | | | | CUP | CUP | |
| Home Occupations | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | | | | A(1) | A(1) | |
| Multifamily Dwellings | | | | | | | P(1) | | | | | | |
| Residential Dwelling Units, Above Ground Floor | | | | | | | | P(1) | | | | | |
| Single-Family Dwelling | P | P | P | P | P | P | P | | | | P | P | |
| Winery, Equal to or Less Than 1,500 sq. ft. of Retail Space | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | A(1) | P | A(1) | | P | | |
| Winery, Greater Than 1,500 sq. ft. of Retail Space | CUP | CUP | CUP | CUP | CUP | CUP | CUP | P | CUP | | CUP | CUP | |
| Commercial Facilities Serving Water-Related Recreational/Tourist Activities, Less Than 5,000 sq. ft. | | | | | CUP | CUP | | CUP | | | | | |
| Lodging Facilities | | | | | | | | P | | | | | |
| <u>Rural Option-1: Vacation Rentals (with permits of different lengths)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> | <u>P(2)</u> | | | <u>A(1)</u> | <u>A(1)</u> | <u>A(1)</u> |
| <u>Rural Option-2: Vacation Rentals (with 1% cap)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(1)</u> | <u>P(2)</u> | | | <u>CUP</u> | <u>CUP</u> | <u>CUP</u> |

P — Permitted use

- P(1) — Permitted use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards
- P(2) — Permitted use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards, except for on parcels that are twelve thousand square feet or smaller, the use/structure must be located on a lot with an existing single-family residence
- A — Accessory use
- A(1) — Accessory use subject to development standards in Chapters 11.88, 11.93 and/or within the applicable zoning district standards
- CUP — Conditional use permit

4.2.2 Unit Types

Some communities limit which types of housing can be used as short-term rentals (e.g. Okanogan). For example limiting it to primary residences or allowing secondary residences to be used.² Some indicate that that the short-term rental can be in either the principal residence or accessory residence but not both (e.g. Jefferson County, San Juan County).

1. Allow short-term rentals within a person's primary residence only. Permit is not transferable to new owner.
 - a. Pros: Recommended to prevent speculation, support neighborhood cohesion, and assist with maintaining housing affordability.
 - b. Cons: Limits flexibility for owner.
2. Allow within either primary residence or accessory dwelling units, recreational vehicles, tents and other secondary housing units. Permit is transferable to new owner.
 - a. Pros: Allowing short-term rentals in either a primary or accessory dwelling could allow for primary owner to increase their income and improve their ability to pay for their monthly housing costs. If a short-term rental is located in an accessory dwelling unit, the owner could continue to live year-round in the primary unit. Permit flexibility facilitates sale to new owners due to retained value.
 - b. Cons: Without restriction some accessory/secondary units may not provide for occupant comfort and safety (e.g. tents, RVs) as much as a permanent structure and result in more noise and discomfort for neighbors. More flexible permit transfer could mean housing values continue to increase, there is more frequent turnover, and there is less neighborhood cohesion.

Recommendations: Option 1 for most cases with some flexibility in zones allowing tourist accommodations or meant for resorts.

- A. Require short-term rentals in primary residence only, unless exceptions apply per "B" below.
- B. Consider flexibility in zones permitting tourist accommodations or zones designed for resorts/second homes (e.g. commercial zones in UGAs; Rural Commercial; Rural Waterfront; Rural Recreational/Residential).

² Also, some limit whether they can apply to attached apartments to avoid defacto hotels in residential areas. However, Chelan County unincorporated areas tend to be lower-density and this concern is likely limited. If it is a concern, then the number of short-term rentals managed by common owners could be limited, e.g. Seattle limits to 2 units.

4.2.3 Limits on Numbers

Limiting the number of short-term rentals can help address concerns about housing affordability and neighborhood cohesion, but can be complex. They should consider investment in existing units and fairness for new applicants. Options include:

1. Cap the number of short-term rentals, countywide or by area (e.g. UGA versus non-UGA area), e.g. 1%. The County could require annual renewal of existing units in one period (e.g. September-November) and then allow for registration of new short-term rentals after the existing number of short-term rentals is established (e.g. February-April). The cap could be established countywide and in UGAs or other defined communities so that there is no over-concentration in one area. (Example of Cap: Pleasant Harbor in Jefferson County.)
 - a. Pros: Addresses housing affordability and community stability concerns.
 - b. Cons: Added tracking and enforcement efforts.
2. Establish distance/separation requirements. (Example: of Distance: Bend, OR.)
 - a. Pros: Addresses community stability concerns.
 - b. Cons: Complex enforcement. Existing short-term rentals in “buffer” areas become non-conforming and may be amortized. Lottery would be needed to allow persons to establish permitted ones and the location of the buffers.
3. Establish permit authorizations of different lengths. In zones allowing tourist accommodations, permits would be long-term and annually reviewed with no term limit. In zones allowing single-family residences, limit short-term rentals to a certain number of days per year, e.g. available for rent fewer than 30 days in a calendar year. (Example of permits of different lengths: Bend and Cannon Beach, OR).
 - a. Pros: Addresses housing affordability and community stability concerns.
 - b. Cons: Added tracking and enforcement efforts.

Recommendations: Either Option 1 or 3 would be more straightforward to implement compared to Option 2. A cap would provide more certainty about the level of potential rentals. Per City of Leavenworth comments some thought on timing of when the count is determined is in order.

- A. Apply a cap.
- B. Consider sub-geographies so that one area does not become the location for all new ones in a given year.

4.2.4 Occupancy

To avoid noise, parking issues, and other nuisance concerns, jurisdictions often limit occupancy. Some relate to bedrooms (examples San Juan County; and Bend and Cannon Beach, OR) and some relate to an overall number (e.g. max 10, Okanogan County). And some have a number per bedroom with an overall cap (e.g. 2 per bedroom up to 10 guests; Pierce County). Options include:

1. Relate occupants to bedrooms; allow limited occupancy in common areas.
 - a. Pros: Relates usage to size of home/number of sleeping quarters.

- b. Cons: More complex. Allows use of common areas for sleeping quarters, increasing usage/density.
- 2. Cap at a flat number of guests, e.g. 10 a number referenced in the International Residential Code in reference to an owner-occupied lodging house.
 - a. Pros: Simpler to enforce.
 - b. Cons: None provided size of unit meets building code standards.

Recommendations: Relate occupancy to bedrooms with a cap related to the International Residential Code.

4.2.5 Standards

Standards for health and safety are included in the state law, though more limited than best practice standards.

- 1. Follow RCW standards only. (No counties examined rely only on RCW which may have post-dated some counties' code.)
 - a. Pros: More streamlined code. Linked to state law.
 - b. Cons: Limited conditions apply to short-term rentals.
- 2. Local Standards.(All examples have local standards.)
 - a. Pros: Tailored to local conditions and needs. More completely addresses best practices.
 - b. Cons: More complex to administer.

Recommendations: Combine RCW standards (by reference) and local standards for some benefits of streamlining and benefits of tailored local requirements important to balance compatibility and neighborhood cohesion.

4.2.6 Permits, Inspections, and Enforcement

Counties in Washington State implement state land use planning (e.g. GMA, RCW 36.70) and regulate permitted and conditionally permitted uses, and have limited authorities under business licensing laws (RCW 36.32.120 sub 3). Further the State recently passed some laws addressing enforcement of short-term rental violations.

Thus, the variations on permits and procedures are limited. The following are recommended:

- Require an annual land use permit. Many counties reviewed in Appendix E reference these as vacation rental or hospitality permits (e.g. Jefferson, Pierce, and San Juan Counties).
- Initial permit should require inspections or review by Fire District and Health District. (examples, Clallam, Jefferson, Okanogan and San Juan Counties have at least fire inspection or other safety inspection; plus cities of Bend and Cannon Beach, OR)
- Set permit fees based on cost of permit review and inspections. (This is common practice.)
- Allow owners to provide affidavit of compliance on renewals. (Most examples in Attachment A.)

- Enforce based on consistency with [RCW 64.37.030](#). This section requires a warning letter and if found to be in violation the vacation rental operator is subject to a class 2 civil infraction with a fine of \$125.
 - The County's enforcement rules in Title 16 appear compatible with RCW 64.37 since Title 16 focuses on education, letters to those violating the code, and civil penalties though amounts differ (\$750-\$1,500 per violation). If there is an investigation and letter from the County to the owner of the rental and an attempt to correct, but continued violations there could be fines and liens.
 - RCW 64.37.030 references civil infractions per chapter 7.80 RCW. RCW 7.80.010 indicates a county can hear and determine civil infractions pursuant to its own system established by ordinance. Thus, the County could potentially amend its civil penalties for short-term rentals to allow three violations and in addition to fines restrict reapplication for a year.

Enforcement options will be further reviewed in consultation with the Prosecuting Attorney's office.

Once a code proposal is developed more fully, we can evaluate the proposed \$500 fee in relation to cost recovery. Example counties range in their permit costs with some at \$200 to over \$2,000 though some may exclude inspections. We will review the costs for an initial inspection and permit and the costs for an annual renewal. Manson UGA permits may be similar to a renewal level.

5 Next Steps

Following County staff review, the Situation Assessment and Options is being presented to the Board of County Commissioners for review and direction. Formal code language will be developed to take forward to the Planning Commission and public review.

6 Attachment A: Code Comparison Matrices

Table 1. Short-Term Rentals Matrix of Example Regulations

| Requirements | Manson, Chelan Co. WA | Clallam County, WA | Jefferson County, WA | Okanogan County, WA | Pierce County, WA | San Juan County, WA | Bend, OR | Cannon Beach, OR |
|-----------------|---|--|---|--|---|--|---|--|
| Classification | One type – rented for less than thirty consecutive days. | Vacation rentals are dwellings intended for occupancy of the entire dwelling (not rental of individual rooms) by any person/group other than the primary owner for periods of 30 days or less. Does not include bed and breakfasts (see note below) or uninhabitable structures like garages, barns, or sheds. See 33.51 | Transient Residence or Transient Guest House (ADU): Single-family residential units and guest houses (ADUs) or portions thereof rented for a period of less than 30 days and operated in a way that prevents unreasonable disturbances to area residents. See 18.20.210 | There is a nightly rental permit for zones where such are permitted outright and CUP for zones where conditionally permitted. If a nightly rental is in a planned development and nightly rentals are an allowed use, they are permit exempt. Nightly rentals may not occur in mobile homes or RVs (modular homes are permitted). There is an amortization period for units that do not comply with rules. | Vacation Rental is a short-term rental accommodation within a legally established single-family or accessory dwelling. Rental occupancy is limited to a period of 30 consecutive days or less. See 18A.37.040 | Vacation rental of a residence or an ADU means a single-family residential unit or an accessory dwelling unit that is rented (for periods of less than 30 days). Not allowed in natural shoreline or conservancy shoreline designations; Agricultural Resource or Forest Resource zones; on Shaw Island or Waldron Island; in owner-builder exempt structures, structures connected to Friday Harbor water system, or structures other than a single-family residence or accessory dwelling (includes boats, tents, vehicles or unpermitted structures). CUP in some zones: Rural Residential, Village Residential, Hamlet Residential) and some other village zones. See 18.20.220 and 18.40.275 | <ul style="list-style-type: none">■ Exempt: Resort zones■ Type I: Admin., No Comment Period. Owner occupied STR or infrequent use <30 days in 4 periods■ Type II: Admin., Notice with Comment Period, Whole House■ Type III: Notice + Hearing: Group property designation | Three categories of STRs. <ul style="list-style-type: none">■ lifetime unlimited permits (rent the property any and all days of the year)■ five-year unlimited permits (same as above but expires in 5 years)■ fourteen-day permits (rent the property to one tenancy group once in a fourteen-day period) |
| Permitted Zones | Permitted in Residential zones. Accessory use in Commercial zones. | Vacation rentals allowed in all zoning districts that allow single-family residence. Permitted outright in most residential zones and some commercial. See Ordinance 913 and 33.03.010 (109) | Transient rental of residences or ADU permitted outright in Resource Land, Rural Residential, and Rural Village Center zones. Short-term rentals permitted outright in Master Planned Resorts. Irondale and Port Hadlock UGAs allow ADUs in all residential zones, and single-family in Urban Low and Urban Moderate Density Res. Transient/short-term rental not specified. | Permitted outright in some rural and resource zones, CUP in Urban Residential and Neighborhood Use zones, and Planned Development in Methow and other Rural Residential zones. | All zoning districts that allow single-family residences. ADUs allowed as an accessory use in conjunction with any detached single-family structure in all zones that allow single-family (except on lots created under Small Lot Design). See 18A.37.020 and 18A.37.120 | Permitted outright in Eastsound Village Commercial. Provisional use (subject to permits) in Village and Hamlet Commercial, Village and Hamlet Industrial, Island Center, and most rural zones. CUP in Village, Hamlet, and Rural Residential zones. Requires an amendment to an adopted master plan in Master Planned Resort zones. Some specific restrictions or CUPs in Olga Hamlet, Deer | Mt Bachelor Village, Deschutes Landing, Courtyards at Broken Top: Exempt Commercial, Mixed Employment Mixed Use: Type 1 Residential: Type II | Residential zones and Manufactured Dwelling Park/RV Park. |

| Requirements | Manson, Chelan Co. WA | Clallam County, WA | Jefferson County, WA | Okanogan County, WA | Pierce County, WA | San Juan County, WA | Bend, OR | Cannon Beach, OR |
|--|---|---|---|---|--|--|---|--|
| | | | <p>Note: CUP in Rural Residential zones for rural recreational lodging or cabins for transient rental.</p> <p>See 18.15.040, 18.18.040, and Title 17</p> | | | <p>Harbor Hamlet, Boatworks HI-A, Orcas Village Activity Center, Country Corner Island Center Plan, Lopez Village UGA,</p> <p>See 18.30</p> | | |
| Limitations-Number | Not specified | Not specified. | <p>Owner/lessee may rent principal residence or guest house on a short-term basis, but not both.</p> <p>Pleasant Harbor MPR development cap of 890 residential units with short-term accommodations (hotels, motels, lodges, and STR) of at least 65% of the total units.</p> | Only one dwelling may be rented per owner in Methow Valley More Completely Planned Area. | Not stated. | Outside of UGAs, one vacation rental is allowed on a property, either in the principal residence or an accessory dwelling. Detached ADUs outside of UGA permitted on or after June 29, 2007 not allowed to be vacation rentals. | Type II, whole house STR in residential areas, 250 feet of separation between properties zoned Residential | No limits to numbers. However, 14-day and 5-year unlimited may not extend beyond the dates approved. Lifetime unlimited does not transfer to new owners. |
| Occupancy Limits | <p>2 for each bedroom plus 2 additional persons, excluding those under age of six.</p> <p>Above Age 6: 1-4 persons bedrooms: 10; 5-6 bedrooms: 14. May not have > 7 rooms.</p> | Not specified. If on-site septic, occupancy must be consistent with the design capacity of the system and type of wastewater discharges allowed. | Not specified. | The maximum number of individuals served by a nightly rental is 10. | Up to five guest rooms with two guests per bedroom, not to exceed a total of 10 guests. | <p>No more than two guests per bedroom plus additional three guests be at any one time. Number of bedrooms is determined by the approved building permit for the structure. Guest is a person over two years of age.</p> <p><i>Does not apply to permits vested or approved prior to March 27, 2018.</i></p> | Maximum occupancy - 2 persons per bedroom plus 2 additional persons. For owner-occupied STRs, 2 persons per rented bedroom, in addition to residents of the dwelling. | 6 per 1 or 2 bedrooms, 8 for 3 bedrooms, 10 per 4 bedrooms, 12 for 5 bedrooms. |
| Parking Stalls | Provide at least one off-street parking space, outside of the required setbacks for each two rented bedrooms. Beyond 2 required for home. | On-site parking adequate to accommodate vacation rental guests (“adequate” not defined). | At least one additional off-street parking space provided for the transient use in addition to the parking required for the residence or guest house. | Not specified. | <p>One off-street parking space required for the ADU in addition to off-street parking required for principal dwelling.</p> <p>Guests provided with information indicating the location of guest parking spaces.</p> | <p>One on-site parking space per bedroom.</p> <p><i>Does not apply to permits vested or approved prior to March 27, 2018.</i></p> | One per bedroom Owner occupied, 2 for owner plus 1 per STR | 2 off-street spaces for 1 or 2 bedrooms, 3 for 3 bedrooms, 4 for 4 or 5 bedrooms |
| Solid Waste, Noise, Signage, Fire, Building | <p>Providing year around solid waste receptacles and pickup service. Trash cans should be removed within 24 hours of pickup.</p> <p>Conform with noise ordinance.</p> | <p>Conform to Building Code, including required inspection to review fire protection.</p> <p>Connection to a public sanitary sewer or on-site septic system – owner</p> | <p>Operated in a way that prevents unreasonable disturbances to area residents.</p> <p>Adequate sewage disposal for the number of guests and current operations and</p> | <p>Need public health permit. Signage limited to one 2 sq. ft. with natural wood and indirect lighting.</p> <p>Occupancy and operation ... shall be ... compatible with the surrounding</p> | <p>Good Neighbor brochure for short-term rentals is provided to each renter.</p> <p>Notify neighboring property owners directly adjacent to the vacation rental property.</p> | Operated according to rules of conduct including trespassing, noise, parking issues, vehicle speeds, and outdoor burning or burn ban violations. Best practices to conserve water included in the rules of | <p>Good Neighbor Guidelines</p> <p>Fire and Emergency Safety Checklist</p> <p>Post License</p> | Weekly solid waste collection service shall be provided. |

| Requirements | Manson, Chelan Co. WA | Clallam County, WA | Jefferson County, WA | Okanogan County, WA | Pierce County, WA | San Juan County, WA | Bend, OR | Cannon Beach, OR |
|---|---|--|---|--|---|---|--|---|
| | Sign adjacent to front door – with occupancy limit and name of local contact. Annual Fire & Life Safety Permit through the Chelan County Fire Marshal. | required to ensure occupancy is consistent with design capacity of septic and type of wastewater discharges allowed. Outdoor storage of solid waste/recyclables must be secured in covered containers and must not create an odor nuisance or attract animals. Provide written notice to renters of noise regulations, rules of conduct (incl. burn bans), easement maps, and waste/recycling rules. | maintenance check on the septic system. Fire/Life/Safety review. No outdoor advertising signs allowed. | neighborhood character. Factors upon which compatibility will be judged include but are not limited to noise, traffic, light, and glare. | Entrance to attached ADU not directed toward any front yard unless utilizing an existing doorway. Detached ADUs no closer to front lot line than the front edge of the principal dwelling. | conduct. Rules of conduct approved by the County and on file in the property management plan with County and property owners within 300 feet. Display map of property boundaries and shoreline access easement or warnings not to trespass if no shoreline access. Solid waste removed every two weeks (stored in completely enclosed and secured receptacles or indoors). Address clearly visible from street or access road. | | |
| Local Representative Location (24 hours a day / 7 day a week) | A local contact person (within a forty-mile radius) to respond at any time. | Owner must provide written notice to renters with the name and number of a local contact person(s) – local is not defined. | Owner/lessee must reside on premise if both a principal residence and guest house on the property. Otherwise not specified. | Not applicable. | Contact information for owner, representative, or property management company (phone and e-mail) in Vacation Rental Affidavit – local not specified. | Designated local property representative who lives on the island where the vacation rental is located and will respond to complaints and emergencies, including a 24/7 valid phone. Included in property management plan on file with County and property owners within 300 feet. | Authorized representative must have read short-term rental regulations, as well as owner (if different). No distance stated. | Must designate one who permanently resides in city or is within 10 miles of urban growth boundary. |
| Permits and Licenses | Limited administrative review application per CCC 14.10.020. Fees for Annual Vacation Permit: \$100.00. | Comply with State transient accommodation requirements (applies to facilities offering 3+ lodging units), including annual license required with the WA State Dept of Health. Business license (DOR) | Hospitality Permit: <ul style="list-style-type: none">■ Land Use Review: \$282■ Septic: \$92■ Fire/Life/Safety: \$188■ Scan Fee: 24■ Technology Fee: 5% Food Establishment Permit Environmental Health if preparing food for guests. If on an individual well and will be serving guests food need to apply to the state to become a public water supply. | A nightly rental permit, or conditional use permit for a nightly rental <ul style="list-style-type: none">■ \$75 for nightly rental permit■ \$700 for CUP Okanogan County Public Health Overnight Transient Accommodation Permit: <ul style="list-style-type: none">■ \$215 annual fee, which covers inspection of the property.■ \$380 for new permit (includes up to 2 site visits). | Building Permit for an ADU. Vacation Rental Affidavit filed with Pierce County Planning and Public Works Department – includes intent to use as vacation rental, contact information, internet sites where advertised, and required neighborhood notification provided. CUP for vacation rentals that cannot meet code standards. | Vacation Rental Permit (includes County approved sewage disposal permit) <ul style="list-style-type: none">■ CUP: \$2,300.■ Provisional use permit: \$1,000.■ Certificate of Compliance: no fee Permit not required in Eastsound Village Commercial (compliance number still required). Certify annually compliance with conditions of permit approval and fire/life/safety. Permits vested/approved after | Land Use Permit: <ul style="list-style-type: none">■ Type 1: \$720.72■ Type 2: \$2006.16 Notice to Neighbors License: \$275 Annual renewal: \$200 | Transient rental permit, business license \$200 for the initial application and \$75 annually thereafter 200 foot notification required for short-term rental permits |

| Requirements | <u>Manson, Chelan Co. WA</u> | <u>Clallam County, WA</u> | <u>Jefferson County, WA</u> | <u>Okanogan County, WA</u> | <u>Pierce County, WA</u> | <u>San Juan County, WA</u> | <u>Bend, OR</u> | <u>Cannon Beach, OR</u> |
|--------------------|------------------------------|---|---|---|--------------------------|---|---|---|
| | | | | | | <p>March 27, 2018 expire two years after date of approval.</p> <p>Advertisement include permit or compliance number. Penalty for advertising or operating an unpermitted vacation rental is \$2,300.</p> <p>Vacation rental permits run with the land.</p> | | |
| Taxes | Not stated. | Local/state (DOR) regulations for sales and lodging taxes, and business and occupation (B&O) tax. | Meet all local/state regulations, including those pertaining to business licenses and taxes. | Provide a valid Washington State unified business identifier (UBI) number for taxation purposes | Not specified | <p>Active vacation rentals must meet local/state regulations, including business licenses and taxes such as Washington State sales, lodging, and B&O taxes.</p> <p>Must have a UBI number regardless of the amount of income the vacation rental generates.</p> | Renting > 30 days: Transient Room Tax at time rent paid | Subject to Transient Room Tax |
| Inspections | Not stated | Inspection required to review fire protection. | At permit. Fire/Life/Safety review required if building was built prior to permitting requirements. | <p>The owner or operator shall provide an inspection report from the building department verifying they have met all applicable building code requirements.</p> <p>Also see Health Department fees and inspections above.</p> | Not specified | Fire inspection approx. every 2-3 years (placed onto fire inspection schedule at permit) | At permit, and per prescribed schedule | At permit, and any time after with notice |

Table 2. Cities of Chelan County – Short-Term Rental Regulations

| Requirements | Cashmere, WA | Chelan City, WA | Entiat, WA | Leavenworth, WA | Wenatchee, WA |
|---|--------------|---|--|--|--|
| Classification | | The City allows STRs in zones that accommodate tourist accommodations (hotel/motel, transient businesses, and accommodations). | Vacation Rental/Short-Term Rental (less than 30 days) | “Bed and breakfast” means an activity whereby the property owners allow visitors in their homes, up to three rooms for compensation, for periods of 30 consecutive days or less, while at the property, owner lives on site, in the dwelling unit, throughout the visitors’ stay. Detached units with rooms are allowed. Accessory dwelling units may be allowed to be a part of the bed and breakfast. | “Transient rental” means a dwelling unit or habitable unit which is used, let, sublet, occupied or possessed for a period of 30 consecutive days or less. |
| Permitted Zones | | <ul style="list-style-type: none">▪ Tourist Accommodation (T-A)▪ Downtown Mixed Use (DMU)▪ Tourist Mixed Use (TMU)▪ Waterfront Commercial (C-W)▪ Highway Service Commercial (C-HS)▪ The Lookout Planned Development | <ul style="list-style-type: none">▪ MTR – Mixed Tourist Recreational: CUP▪ W-B – Waterfront Business: CUP▪ W-T – Waterfront Transition: MUPD | Residential Low Density and Multifamily Districts: CUP. | Permitted in: <ul style="list-style-type: none">▪ CBD▪ WMU▪ OMU▪ RMU▪ HEO▪ MRC▪ PO▪ RRO |
| Limitations-Number | | Not stated | Not stated | Not stated | Not stated |
| Occupancy Limits | | 2 persons per each double bed or larger excluding up to 4 children. More than 10 tenants meet standards per building official, and be greater than 2000 SF to comply with International Residential Code. Must have habitable space requirements of 70 SF and 50 SF per person. Existing legal allowed. | Not stated | Two people for each bedroom, excluding children under the age of six. | |
| Parking Stalls | | Meet City standard parking requirements. Provide parking diagram. Existing legal STRs that do not meet parking standards are grandfathered. | | One off-street space for each room rented. All parking must be accommodated on site and not in required yards. | 1 space per bedroom |
| Solid Waste, Noise, Signage, Fire, Building | | Weekly solid waste collection service shall be provided. Trash must not be visible from public view and must be in proper containers on collection day. Noise shall not be in violation of CMC Chapter 8.31, Public Disturbance Noises. Occupancy and operation shall be compatible with the surrounding neighborhood character. The short-term rental shall not give the | CUP criteria address health and safety: (1) The proposed use, at the proposed location, is consistent with the purposes of the comprehensive plan, the zoning code and the zone district in which it is to be located, and that the proposed use will meet all applicable requirements of this title. | Written management plan with management structure, information related to emergency exit routes, 24/7 contact information, required guest rules and regulations, including for litter control, quiet hours, parking, and proposed methods to enforce occupancy limitations and other requirements. | Not stated |

| Requirements | Cashmere, WA | Chelan City, WA | Entiat, WA | Leavenworth, WA | Wenatchee, WA |
|---|--------------|--|---|--|---------------|
| | | appearance of being a business. Factors upon which compatibility will be judged include but are not limited to: noise, traffic, solid waste management, signage, and light and glare. | (2) The use, as conditioned, will not be significantly detrimental to the public health, safety and welfare; diminish the value of nearby property or improvements; or disturb persons in the use of property unless the conditional use is a public necessity. | Annual Building, Fire & Life Safety Occupancy Permit Application. | |
| Local Representative Location (24 hours a day / 7 day a week) | | If the owner does not permanently reside within the Chelan City limits or is not always available when the property is being rented, the owner shall provide the name, telephone number and email of a qualified person (which can be a person or company) who can be contacted concerning use of the property and/or complaints and can respond to the property within 30 minutes to complaints related to the short-term rental. | Not stated | Owner must live on-site throughout visitor stay. | Not stated |
| Permits, Licenses, and Insurance | | All short-term rental owners or authorized agents shall obtain a valid City business license and State UBI # and annually renew it. \$250 first time license, \$150 annual renewal The short-term rental operating license registration number shall be listed on all short-term rental advertisements. State requirements for liability insurance for coverage of no less and \$1 million. | Conditional Use Permit Fee not published | Obtain a City business license and separate annual permits | Not stated |
| Taxes | | The owner shall be in compliance with the Chapter 3.36, Special Excise Tax on Lodging, and other local sales taxes and state hotel/motel and sales taxes in accordance with the Department of Revenue. | Not stated | Short-term rentals are subject to lodging taxes | Not stated |
| Inspections | | Prior to approving the initial operating license, the City shall perform a life-safety inspection. After the unit is approved for rental, a completed self-certification checklist for health and safety (fire extinguishers, smoke alarms, carbon monoxide detectors, appropriate egress, etc.) shall be required with each annual operating license renewal consistent with forms provided by the Administrator. | Not stated | Prior to operations. Thereafter with property owner certifying Annual Building, Fire & Life Safety Occupancy Permit Application. | Not stated |

7 Attachment B: Unit Types used as Short-Term Rentals Unincorporated Chelan County January 2020

| | |
|----------------|--------|
| County | Chelan |
| Unincorporated | yes |
| Listing Type | (All) |
| Year 2020 | 2020 |

| Row Labels | Cashmere | Chelan | Entiat | Leavenworth | Malaga | Manson | Peshastin | Wenatchee | Grand Total |
|----------------------------|-----------|------------|----------|-------------|----------|------------|-----------|-----------|--------------|
| Apartment | 3 | | | 35 | 1 | 4 | 3 | 1 | 47 |
| Barn | 1 | | | | | | | | 1 |
| Bed and breakfast | | | | 19 | | | | 1 | 20 |
| Boutique hotel | | | | | | 1 | | | 1 |
| Bungalow | 2 | 1 | | 5 | | 4 | | 1 | 13 |
| Cabin | 2 | 8 | 2 | 255 | | 3 | 15 | 2 | 287 |
| Camper/RV | 1 | 1 | | 2 | | 1 | | | 5 |
| Campsite | | | 1 | 3 | | | | | 4 |
| Cave | | | | 1 | | | | | 1 |
| Chalet | 4 | | | 45 | | 1 | 4 | 1 | 55 |
| Chateau / Country House | | 1 | | 2 | | | | | 3 |
| Condo | | 2 | | 5 | | 15 | | | 22 |
| Condominium | | 6 | | 17 | | 45 | | 2 | 70 |
| Cottage | 1 | 2 | | 10 | | 3 | | | 16 |
| Earth house | | | | 2 | | | | | 2 |
| Estate | | 1 | | | | | | | 1 |
| Farm stay | 4 | | | 2 | | 2 | | | 8 |
| Farmhouse | 1 | | | | | | 1 | 1 | 3 |
| Guest House | | | | 3 | | | | | 3 |
| Guest suite | 8 | | | 47 | | 1 | 1 | 3 | 60 |
| Guesthouse | 1 | | | 14 | | 3 | 3 | 1 | 22 |
| Hotel | | | | 1 | | | | | 1 |
| House | 9 | 74 | | 284 | 3 | 183 | 27 | 30 | 610 |
| Lodge | | | | 23 | | | 1 | | 24 |
| Loft | | | | 2 | | | | | 2 |
| Nature lodge | | | | 2 | | | | | 2 |
| Resort | | | | | | 3 | | | 3 |
| Room in hotel | | | | | | 4 | | | 4 |
| Room in serviced apartment | | | | | | 2 | | | 2 |
| Studio | | | | 2 | | 2 | 1 | | 5 |
| Tent | | | 1 | 1 | 1 | | | | 3 |
| Timeshare | | | | | | 1 | | | 1 |
| Tiny house | 2 | 1 | | 10 | | | | | 13 |
| Townhome | | | | 1 | | 3 | | | 4 |
| Townhouse | | 1 | | 3 | | 12 | | | 16 |
| Villa | | 2 | | 6 | | 2 | | | 10 |
| Yurt | | | | 2 | | | | | 2 |
| Grand Total | 39 | 100 | 4 | 804 | 5 | 295 | 56 | 43 | 1,346 |

AirDNA 2020; BERK 2020

8 Attachment C: Comment Compilation as of March 2020

- Comment Matrix Fall 2019
- Public Comment Early 2020

| | A | B | C | D | E |
|----|---|-------------------|--|----------------------|---|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 2 | All of these comments are from pdf file titled "Short Term Vacation Rental Public Comment- clean" | | | | |
| 3 | Fallon | Bob | bobfallon@gmail.com | 7/5/2019 | Concerned with STRs impact on residential areas, increased housing costs, negative impacts to school districts, increased pressure on public services, owners not part of community. Suggests limitations of STRs within residential areas, one per owner in county, escalating penalties for repeat offenses. |
| 4 | Harris | Bruce and | blharris01@live.com | 7/8/2019 | Stated garbage cans are left curb site for once a week pick up which attracts animals and makes community look untended and unattractive. Suggests STRs employ removing garage at the end of each rental when they clean for the next renter. |
| 5 | Terharr | Bill | btterhaar@nwi.net | 7/8/2019 | Issues with unregulated units with no onsite manager. Suggests all B&B's require a CUP. Question why small STRs would be permitted outright with standards and larger would require CUP. Suggests looking at lot size to be evaluated through CUP. CUP allows Chelan-Douglas Health District to comment on septic, hot tubs, and pools. |
| 6 | French | Franklin | ffrench50@comcast.net | 7/2/2019 | Concerns with renters starting fire during burn ban, fence for hot tubs in addition to pools, advertising rentals using pictures of neighboring property. Appreciates draft code addresses trespassing. |
| 7 | Fischer | Greg and L | lyndaf55@hotmail.com | 7/3/2019 | Concerned with negative effects of STRs including increase in traffic, noise level, safety, and outdoor fires. |
| 8 | Steeber | Greg and M | gmsteeber@gmail.com | 7/4/2019 | On behalf of Friends of Leavenworth the following recommendations were submitted for the Planning Commission to consider with the following goals: 1) Maintain the residential character of the neighborhoods in Chelan County; 2) Increase affordable housing in Chelan County; and 3) Allow well regulated STR properties in Chelan County. Whole house rentals of less than 30 days in residential zones should be limited to RR5 acres or smaller with the following requirements: 1) limit of 10 people or fewer including children; 2) maximum of 4 bedrooms; 3) rentals which exceed threshold allowed in commercial zones; 4) CUP require for all zones; 5) annual registration fee based on number of bedrooms; 6) 1 off-street parking space per bedroom with no street parking; 7) permit number posted on outside of home to include pertinent information; 8) limit use of new SFR to exclude STR use for 5 years; 9) CUP is to property owner, not property; 10) garbage screened and only put out on collection day with cans removed within 24 hours of pick up; 11) comply with county and state noise ordinances/no amplified sound allowed beyond property lines; 12) CUP review for septic; 13) CUP document fire safety; 14) pool use limited to registered guest; 15) Hotline for complaints; 16(3 citations or operating without registering unable to apply for registration for one year; 17) maximum percentage of STRs allowed in zones, STRs prohibited in subdivisions that were granted bonus densities; limit on number on STRs an individual or corporation can own; 18) encourages use of outside vendor; 19) address environment, health, and safety issues. |
| 9 | Chicoine | Joe | joe.chicoine@gmail.com | 6/28/2019 | Draft code addresses common complaints and makes homeowners responsible. Concern that with implementing enforcement. Attached article on San Diego's amendments to STR regulations. |
| 10 | Holm | Jerry | jholm@nwi.net | 7/16/2019 | On behalf of the Forest Ridge Wildfire Coalition addresses concerns with wildfire danger characteristics of the region. Questions about code compliance and response of local representative. |
| 11 | Howard | Jesse | yrconscience@gmail.com | 7/4/2019 | Unclear on how county will record/register complaints and determine if they are a violation. Parking needs to be out of county road. Larger notification area for notice of STRs to neighbors, look-up database on website. Address regulations for property management companies. Expects fee associated with STRs. STRs are a business and should be regulated like a business. |

| | A | B | C | D | E |
|----|-----------|------------|--|---------------|---|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 12 | Longley | Ken | kenlongley66@gmail.com | 7/1/2019 | Concerns with parking and code needs to address number and location. Boats, campers, and trailers should not be allowed. Limit the number of guests. Prohibit STRs from November 1 to May 1 due to winter conditions. Dogs need to be leashed and under voice control. Concerns with fire danger. Include noise ordinance in code. Address outdoor garbage to protect from animals. Feels process is unclear in draft ordinance. Reapply every year. STRs should be taxed differently. Homeowner liability insurance. Address violations of law as violation of code. Prohibit sex offenders from renting or require disclosure information. STR maintain registry for renters. STRs should have land lines. Property manager identified in STR application and in management plan. |
| 13 | Powers | Lorri | lorripowers49@gmail.com | 7/16/2019 | Wishes to speak at the July 26 Planning Commission Meeting. |
| 14 | Bohman | Mara | mbohman@aol.com | 6/27/2019 | Concerns with STR density and thinks it needs to be limited. Long term rentals and housing is being lost to STR. Permits should not be able to be automatically transferred upon sale of property. One permit per homeowner will help to keep properties in compliance with residential zoning. CUP must be required no matter the size. Believes it would be prudent of the county to retain outside experts, such as Host Compliance, at least for part of monitoring of STRs. Code Enforcement can still be handled by county. Linked Manzanita, OR STR ordinance. |
| 15 | Clark | Maribeth | maribeth.clark@vacasa.com | 6/30/2019 | Unfair that 3300 sq ft 3 bdrm house has a different process than their 3650 sq ft 4 bdrm house. Inquires about cost and process of CUP. Believes the current Manson Vacation Rental Permit is adequate. Owns/operates STR. |
| 16 | Olivier | Mark | charmar260@gmail.com | 6/28/2019 | Within 300 yards of their property on Division Street there are ~4-5 STR. Believes STR should have to adhere to same standards as hotels, motels, and B&Bs, otherwise would be unfair competition. Traditional accommodation units have to adhere to applicable codes such as Fire Code, ADA, CCC, STR should too. STR lowers adjacent property values. 3 strike rule seems to be only way to add consequences to valid violations. Encourages consideration of not just as current problems associated with STR but also future problems. |
| 17 | Newell | Nathan and | 509-393-2330 | 6/26/2019 | Consider a homes overall sq footage when determining occupancy. Number of bdrms does not reflect the number of guests that can stay at STR. |
| 18 | Hills | Rebecca | mamahills@frontier.com | 7/1/2019 | Concerned about presence of STR in Leavenworth UGA where they are not permitted. Owner has been made aware of the restriction but continues to rent. STR create intolerable noise that violates noise codes. The police often have to be called. Attached information about one problem STR in the area. |
| 19 | Johnson | Robert | rh1johnson4@hotmail.com | 6/19/2019 | Wants county to restrict and limit STR by non-resident owners. Non-resident owned STR raises property prices, limits long term rentals, and limits number of houses available to those who live in the area. This dramatically changes communities and is incompatible with neighborhoods. STR also increase wildfire risks b/c renters don't know about fire dangers and have large irresponsible fires. Additionally overburdened septic systems cause substantial smell. STR is not compatible with residential uses and only take money out of the communities. |
| 20 | Hunter | Susan | susaninwa@gmail.com | 7/10/2019 | Draft code addresses 1 STR per lot but not how many are allowed in a neighborhood. Would like to see density levels per area. Line 128, would like trash cans to go out and be taken in after pick up within 24 hours due to bear and other wildlife concerns. Would like to know who to contact in regards to STR violations. Would like fire flow requirements. |

| | A | B | C | D | E |
|----|-----------|------------|--|---------------|--|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 21 | Lynn | Sean | sean@loveleavenworth.com | 6/26/2019 | Owns/operates STRs. Feels that there is no evidence to support the restrictive proposed codes for STR. Feels the draft code lacks forethought and planning. Requests the CC Commission requests data to warrant the need to change the code. Why rush to regulate? Why is there a line item for \$750,000 in the 209/20 CCCD budget but no fees mentioned? Why no permitting requirements what does a CUP look like? Will permits be SEPA exempt? Why is County opening up to liability for issues that are neighbor to neighbor? Why does proposed code call out certain items and then point back to existing code? What are the issues with STR in our community and how does the proposed code solve them? STR fundamentally use homes the same as long term rentals, what are the property rights concerns here? What is the legal precedent? |
| 22 | Shum | Steve | steveshum@aol.com | 6/28/2019 | Will there be any fire code requirements for STR over 3601 sq ft in regards to sprinklers? Will there be any setbacks from neighbors for STR. |
| 23 | Shum | Steve | steveshum@aol.com | 6/24/2019 | Believes there should be a distance between STRs. |
| 24 | Witners | Stan and V | winterss1@me.com | 7/8/2019 | Areas that have existing STR code should have those codes recognized as separate from new STR code. Feels particularly strong about Peshastin code as it has been successfully implemented for more than 10 years. It is clear that STR are not allowed in residential areas in Peshastin, yet they are still operating. More action is needed in code enforcement. |
| 25 | Witners | Stan and V | winterss1@me.com | 7/1/2019 | Representing Peshastin Community Council. Feeling blindsided by the inclusions of the Peshastin in the STR code and encourages the removal of it. |
| 26 | Doherty | Tracey | ttsvdoherty@gmail.com | 7/1/2019 | Concerned by lack of enforcement of STR violations. STR are disruptive to the properties around them when they are not properly. They have had to call Rivercom about their next-door property, which is an STR, due to noise disturbances. Public urination and profanity are common. They are not anti-STR just anti-STR w/o appropriate regulations. Code enforcement for STR needs to be improved. If codes similar to those of the City of Leavenworth, such as the requirement of an on-site caretaker, were adopted, then many of these issues would be mitigated. Attached phot of bridal shower van with phalluses drawn on the windows. |
| 27 | Hatley | Tobby | tobbyh@wahospitality.org | 7/10/2019 | Unsure how apartments or condominiums would be regulated. Concerned that an owner of a condominium or apartment building would be able to operate it like a hotel without following the rules that a hotel or motel operator must follow. |

| | A | B | C | D | E |
|----|------------------------|------------|--|---------------|--|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 28 | Shea | Tim | tjs1163@cox.net | 7/5/2019 | Have lived in Ponderosa Community Club since 1982. since that time many residences have been purchased by person from the Seattle Metropolitan area for the purpose of becoming an STR. They can operate like an unregulated motel. No other business, such as a hotel or motel, would be permitted in a residential area. STR are doing just that though. Hotels or motels would not be permitted to put a dozen people into a 2 bdrm or 1 bdrm house, or allow renters to pitch tents on their lawns, but STRs regularly do. They would not be allowed to have open bonfires, but STRs regularly do. They would not be permitted to break noise ordinances, but STRs regularly do. They would not be permitted to have unleashed dogs or off-site managers, but STRs regularly do. Because of the comparative inexpensive per person cost of STR large groups of people over a dozen in small structures are not uncommon. Because of the location of many STR, response of Sherriff's deputy is difficult and sporadic. STR is a commercial use not a residential use. Trespassing, prohibited campfires, and littering is common. Property owners do not know who is coming to their property because of the inherent anonymity of the process. Property managers are unresponsive to concerns. The renters of STR are not from the area and are there to have a good time, not be a good neighbor because they have no consequences. Loud parties happen every weekend. STR are a business that need to be regulated like any other business. |
| 29 | Holgate | Zelda | zeldascott123@gmail.com | 7/2/2019 | Wishes to speak at the July 24 Planning Commission Meeting. |
| 30 | Detering | Abigail | adetering1174@gmail.com | 7/21/2019 | Owens/operates STRs. Against STR regulations. STR are how a large percentage of Chelan County residents earn their living. Proposed STR regulations are absurdly strict and will negatively impact residents and will decrease amount of tourist. Equitable and reasonable regulations may be positive but what has been proposed is too much. |
| 31 | Taylor | Andy | ataylor10@hotmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 32 | Anderson | Brian | leavenworthcozycabin@comcast.net | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 33 | Huber | Brian | brianthuber@hotmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 34 | Nyberg | Bruce and | bknyberg@comcast.net | 7/21/2019 | Owens/operates STR. Opposes STR regulations. |
| 35 | Shipman | Brian | cranehawk12@gmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 36 | Rockwell-K | Connie | connrock@earthlink.net | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 37 | Eby | Daniel | ebv.dan@gmail.com | 7/18/2019 | Wishes to speak at the July 24 Planning Commission Meeting. |
| 38 | MacIndoe | Dan | danmacindoe@gmail.com | 7/22/2019 | Has vacation cabin in Chiwawa River Pines and was party to lawsuit in that area about STR. Has rented cabin since early 90's without complains. Opposes STR regulations. The 3 strike rule will be abused by neighbors to shut down STRs. Common sense rules could be helpful. \$500 annual fee is extreme. Number of guest restriction is too restrictive and is impossible to regulate. |
| 39 | Mundle | Dan and Je | djmundle@msn.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 40 | Poole | Dave | dpooles@microsoft.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 41 | Grass | Eli | egrass@gmail.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 42 | Friends of Leavenworth | | | | pg 102-103 |
| 43 | Diamond | John | luckyjohn100@yahoo.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 44 | Goodridge | Jennifer | j_goodridge@hotmail.com | 7/20/2019 | Concerned about public notice of this process. Questions how much the permits will cost. Questions what problem is trying to be solved. If noise is the concern than maybe the regulations should only apply to STR that sleep more than 4 or have off site owners. Concerned that neighbors could shut down the, doesn't think a blanket policy is fair. |

| | A | B | C | D | E |
|----|-----------|------------|--|---------------|---|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 45 | Grassley | Jamie | jamiegrassley@gmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 46 | Huber | Jamie | jamieleehuber@gmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 47 | Joslin | James | jamesbjoslin@gmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 48 | Koopmans | Jacob | jacob.e.koopmans@gmail.com | 7/22/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 49 | Meese | Joshua and | Joshua.Meese@belinghamschools.org | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 50 | Bookey | Kevin | ksbookey@gmail.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 51 | Taylor | Kimber | kimbersmth@hotmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 52 | Wagman | Kelly | kellywag@outlook.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 53 | Fallon | Marty | martyfallon@gmail.com | 7/19/2019 | STR are not compatible with residential communities and neighborhoods. STR code should be to preserve the integrity of residential zoning. Density >5% of total homes should be allowed to be STR. Maximum occupancy, including children, should be capped at 10 in residential zones, greater in commercial. One STR per owner (attached Okanogan County Code with similar provision). CUP should be required for all STR in residential zones. CUP for STR in residential zoning should not pass on with sale of property. Chelan County should enforce UGA regulations. Owner must enforce fire regulations. Swimming pools should only be useable by renters. Permit fees should be based on occupancy. Areas are quickly transitioning from single-family residential to business operations. That must be prevented. |
| 54 | Skougstad | Norman | skougnp@hotmail.com | 7/21/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 55 | Oritz | Patricia | ortizie@nwi.net | 7/21/2019 | Addendum to Peshastin Community Council's comment adding information regarding a discussion between CCCD Director and members of the council. Contains recommendations for changes to Peshastin UGA code. Attached Pacific County STR information. |
| 56 | Huffman | Susan | huffman@nwi.net | 7/12/2019 | Would the STR code apply to UGAs? Who will enforce the STR code? |
| 57 | Lillquist | Cami | camil@jdsalaw.com | 7/23/2019 | Delivered for Samuel Rodabough and Michelle Green of Samuel A Rodabough PLLC and Jeffers, Danielson, Son & Aylward, P.S. on behalf of the Short-Term Rental Alliance of Chelan County ("STRACC"). Believes the draft STR code will negatively impact the local economy, expand the size and reach of local government without achieving the County's aim, and will open the County to litigation. Urges the Planning Commission and County Commissioners to reject the draft code. Draft code doesn't allow for STR of more than 5 bedrooms. CCC already address the issues that are discussed in the draft code and the county should enforce the existing code instead of implementing new ones. The one-year suspension of the STR permit can't be done without a hearing. The draft code may be considered a takings by the courts. Attached is a letter from the STRACC Executive Board expressing concerns about the CCCD Budget, lack of transparency in the process, the public notice process, lack of cause for the STR code, and apparent unusual speed of the code process. Also attached, CCCD 2019 Budget Summary, an email chain from CCCD to a redacted person, and Short Term Rental Data set apparently compiled by STRACC. |
| 58 | Bookey | Terri | tlbookey@gmail.com | 7/22/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 59 | Furrer | Tracie and | furrercabin@gmail.com | 7/22/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 60 | Vetrovsky | Thomas | tvetrovsky@vmware.com | 7/22/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |

| | A | B | C | D | E |
|----|-----------|------------|--|---------------|---|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 61 | Emery | Virginia | virginia@betahatch.com | 7/22/2019 | Owens/operates STR. Opposes STR regulations. Says STRs are beneficial due to the money and business they bring into local economy. Thinks proposed code will have a net negative impact on tourism. |
| 62 | Holgate | Zelda | zeldascott123@gmail.com | 7/15/2019 | Owens/operates STR. Concerned about how County would manage 3 strikes and your out policy, how the occupancy limits would be set, and requiring fire suppression for homes greater than 3,600 sq ft in size. |
| 63 | Parrish | Tina & Dan | alpinestube@gmail.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 64 | Ware | Adam | adampware@gmail.com | 7/24/2019 | Owens/operates STR. Opposes STR regulations. Says STRs are beneficial due to the money and business they bring into local economy. Supports enforcing current regulations. |
| 65 | Patterson | Brian | bcpatters@yahoo.com | 7/23/2019 | Chelan County should consider limiting where and how many STRs are allowed in the Lake Chelan Valley portion of the County. Opposes allowing STRs in areas zoned for low and medium density residential use (RR20/RR10/RR5/RR2.5/R-1/R-2/UR1/ and UR2). STRs should be held consistent with parking requirements in place for bed & breakfasts and guest inns. STRs should provide proof of liability insurance. Septic inspections should be required every 3 years. |
| 66 | Florea | Carl | carlflorea@gmail.com | 7/23/2019 | Comment/email not found (originally sent to Lynn on 7/23). |
| 67 | Goehner | Duane | duane@live.com | 7/24/2019 | Opposed to authorizing nightly rentals. Wants county to enforce the nightly rental code already existing even if it means more litigation. Concerned about STR owners who are not local not screening renters. Wants the quality of life within a residential neighborhood to be valued over STRs. |
| 68 | Boyd | Fred | boyd_fam6@msn.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. But if implemented, proposed fee should be based on occupancy. |
| 69 | Cutler | Gerry | gerryc122@gmail.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 70 | Smith | Gabe & De | pyro4492@hotmail.com | 7/24/2019 | Opposes STR regulations. Instead need consistent enforcement of current regulations. |
| 71 | Savastano | Hernan & A | snowgrasslodge@gmail.com | 7/24/2019 | Owens/operates STR. Opposes STR regulations. Proposed code would require retrofitting existing lodge with sprinklers & be a burden financially. |
| 72 | Black | Jennifer | black.jennifer.r@gmail.com | 7/24/2019 | Opposes STR regulations. Instead need consistent enforcement of current regulations. |
| 73 | Bettinger | Kaylin | kaylin@uvmend.org | 7/23/2019 | Neutral - Leavenworth businesses are being impacted by lack of available Leavenworth area housing for their employees. Upper Valley MEND - group of local business leaders in the Leavenworth area have endorsed this letter. |
| 74 | McRoberts | Kimberly | kamcroberts02@gmail.com | 7/23/2019 | Opposes STR regulations. Instead need consistent enforcement of current regulations. |
| 75 | Brunner | Marianne | info@brunnerslodge.com | 7/24/2019 | Owens/operates STRs. Doesn't like the 3 strikes rule - should be a fine against the renter instead. Concerns about occupancy limits. Wants STR code process to slow down & get things right. |
| 76 | Langer | Maria | mlanger@mac.com | 7/24/2019 | Owens/operates STR. Concerned the proposed STR regulations will force her to close up her glamping site in Malaga. |
| 77 | Mills | Mike | mmillsnc@att.net | 7/24/2019 | Opposes STR regulations. Proposed regulations will hurt tourism. Enforce existing regulations. |
| 78 | Clayton | Patricia | pclyat23@gmail.com | 7/24/2019 | Opposes STR regulations. Proposed regulations will hurt tourism. Enforce existing regulations. |
| 79 | Abbruzzi | Rita | rcabbruzzi@gmail.com | 7/24/2019 | Opposes STR regulations. Instead need consistent enforcement of current regulations. |
| 80 | Gibbs | Rusty | rusty@gibbs-graphics.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. |
| 81 | Hills | Rebecca | | 7/18/2019 | Wants STR regulations. Has issues with neighborhood STRs having late-night parties & wants to preserve neighborhood regulations. |
| 82 | Lynn | Sean | sean@loveleavenworth.com | 7/23/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 83 | Monahan | Tom | celticcross3000@yahoo.com | 7/24/2019 | Owens/operates STR. Opposes STR regulations. |
| 84 | Steinburg | Twyla | twylas43@charter.net | 7/24/2019 | Opposes STR regulations. |
| 85 | Curry | Whitney | whitneycurry@gmail.com | 7/24/2019 | Owens/operates STR. Opposes STR regulations. Signed form letter by Love Leavenworth Vacation Rentals. |
| 86 | | | | | |

| | A | B | C | D | E |
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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 87 | All of these comments are from pdf file titled "STVR Comments from 7-24-2019 to 8-26-2019" | | | | |
| 88 | Robin | John | robin@posthotelleavenworth.com | 8/18/2019 | Wants STR regulations due to large noisy parties |
| 89 | Trichler | Jason | jtrichler@yahoo.com | 8/21/2019 | Concerned about occupancy limits. Owns/operates STR. |
| 90 | Shumway | Steve | steveshum@aol.com | 8/21/2019 | Wants limits on STRs in high density neighborhood. |
| 91 | Carlisle | Matthew | carlislematthew@hotmail.com | 8/17/2019 | Wants STR regulations due to noise, trespassing, garbage, occupancy limits, and desire for 24-hr. support. |
| 92 | Hills | Rebecca | mamahills@frontier.com | 8/15/2019 | Wants STR regulations due to occupancy limits and is also concerned about the pools meeting Health Dept. regulations. |
| 93 | Borges | Camila | camilafletcher@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 94 | Geers | Jeff | jeffgeers@outlook.com | 8/23/2019 | Owns/operates STR. Supports inspections/occupancy limits/zoning restrictions, but doesn't support proposed noise nuisance policy. |
| 95 | Riddick | Melanie | melanie.riddick@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 96 | Harris | Cody | codycharris@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 97 | Clark | Andrea | andrea.clark@vacasa.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 98 | Simonis | Matt | k9mat@hotmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 99 | Savastano | Hernan | snowgrasslodge@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 100 | Kertson | Kim | dunegrass@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 101 | Nunn | Brook | brookh@uw.edu | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 102 | Glockner | Joe | gloc_haus@outlook.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 103 | McRoberts | Kimberly | kamcroberts02@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 104 | Sucich | Angela | asucich@hotmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 105 | Anderson | Allegra | allegraand@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 106 | Eikenberry | Don | doneikenberry@hotmail.com | 8/22/2019 | Owns/operates STR. Wants enforcement of existing noise ordinances. Occupancy limit concerns when it comes to including children. Wants more time for property representative to be on site. Wants rental property manager to have business license in lieu of the owner. |
| 107 | Curry | Whitney | whitneycurry@gmail.com | 8/22/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 108 | Patterson | David | davepatt1955@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 109 | | | | | |
| 110 | All of these comments are from pdf file titled "STVR Comments 8-27-2019" | | | | |
| 111 | Noble | Deborah | life.gardener@hotmail.com | 8/27/2019 | Opposes STR regulations. |
| 112 | Thresher | Michael | michael@thresherphotography.com | 8/27/2019 | Owns/operates STR. Opposes STR regulations. |
| 113 | | | | | |
| 114 | All of these comments are from pdf file titled "STVR Comments PC Meeting 7-24-2019 - Clean" | | | | |
| 115 | Eby | Daniel | 237 Timber Ridge Canyon, Leavenworth | 7/24/2019 Meeting | Legal Committee Chair of STRACC. Opposes new STR regulations. Says problem is that Chelan County Community Development does not enforce the current code when issues occur. Punish person causing the disturbance but don't punish the owner of the property. |
| 116 | Newell | Summit | | | Son of owners of Leavenworth Lodge. Opposes new STR regulations. Enforce existing code. Punish/fine those that break law. |
| 117 | Burnett | Brian | | | Chelan County Sheriff. Appears to be fewer complaints about STRs than hotel guests/long-term residents in Chelan County. Law enforcement can work with STR owners/operators to remove problem renters if violating their contract. If have problem with an STR, contact Sheriff or RiverCom |
| 118 | Rossing | Barbara | 7785 E. Leavenworth Rd. | | Wants STR regulations. Has several proposed changes for the STR code. Would also like to address density of STRs in neighborhoods & has suggestions on how to do so. |

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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 119 | Bohman | Mara | 7840 E. Leavenworth Rd. | | Wants STR regulations. Large lodges in neighborhoods significantly impact the quality of life. Noise, parking, & trash are big issues. Wants County to address the allowed density of STRs in neighborhoods. |
| 120 | Holgate | Zelda | 18720 Fir Loop, Leavenworth | | Owns/operates STRs. Vice Chair of STRACC. STRs are economically beneficial for the County. Neighbors of STRs refuse to work on improving the situation, just complain to the County. Enforce existing codes instead of implementing new ones that could impact County negatively. |
| 121 | Davis | Reava | 8211 Lynn St., Peshastin | | Supports STRs in the Peshastin Community. |
| 122 | Thirlby | Richard | 1210 Dempsey Rd., 98826 | | Wants STR regulations. Wants code to say "portable fireplaces/pits must be locked when burn ban is in effect." Supports utilizing Host Compliance. |
| 123 | Thomason | Alex | Represents Thomason Justice, PS | | Objection to July 12, 2019 Determination of Non-Significance. Hired by several anonymous homeowners |
| 124 | Thirlby | Kat | 1210 Dempsey Rd., 98826 | | Wants STR regulations. Concerned about STR densities in neighborhoods. Increases housing costs. Traffic/noise/fire safety concerns. |
| 125 | Winters | Stan | 8200 River View Rd., Peshastin | | Peshastin Community Council. Wants County to enforce current STR regulations and outlaw them in Peshastin UGA |
| 126 | Lynn | Sean | sean@loveleavenworth.com | | Owns/operates STRs. Owns Love Leavenworth property management company. Opposes STR regulations. Wants whole proposed code overhauled. |
| 127 | Patterson | Brian | 150 Kestrel Lane, Manson | | Chelan County should consider limiting where and how many STRs are allowed in the Lake Chelan Valley portion of the County. Opposes allowing STRs in areas zoned for low and medium density residential use (RR20/RR10/RR5/RR2.5/R-1/R-2/UR1/ and UR2). STRs should be held consistent with parking requirements in place for bed & breakfasts and guest inns. STRs should provide proof of liability insurance. Septic inspections should be required every 3 years. Attached "White Paper" |
| 128 | Pfluger | Lee | | | CEO of Building North Central Washington. Questions if County really wants to get involved in what is mostly neighbor vs. neighbor disputes. List of 10 questions they would like addressed. |
| 129 | Gustin | Amy | | | Chairman of Building North Central Washington. Questions if County really wants to get involved in what is mostly neighbor vs. neighbor disputes. List of 10 questions they would like addressed. |
| 130 | Lewis | Doug & Ch | 16750 Brown Rd., Leavenworth | | Wants STR regulations. Concerned about number of guests at STRs. Wants enforcement of existing CUPs for STRs. |
| 131 | Fallon | Bob | 12275 Village View Dr., Leavenworth | | Wants STR banned outright in County. Concerns about density of STRs in neighborhoods that ruin their character. Also concerned about the commercial use in a residential zone. |
| 132 | Fallon | May | 12275 Village View Dr., Leavenworth | | Wants STR regulations. Concerned about STRs being used as "event centers" that disrupt residential neighborhoods. |
| 133 | Blum | Kathy | 15 Helios Hills Lane, Manson | | Member of Manson Community Council. Wants moratorium on new STRs in Manson. Wants new code to address density limits. Concerns about septic system problems with STRs. Wants mandatory land line required in STRs. Wants capacity limits based on septic requirements. |
| 134 | | | Manson Community Council | | Wants moratorium on new STRs in Manson. Wants new code to address density limits. Concerns about septic system problems with STRs. Wants mandatory land line required in STRs. Wants capacity limits based on septic requirements. |
| 135 | Fazio | Sue | 205 Helios Hills Lane | | P. 66 |
| 136 | | | | | |
| 137 | | | | | |
| 138 | | | | | |
| 139 | | | | | |
| 140 | | | | | |
| 141 | Harada | Steve | harada.steve@gmail.com | 9/8/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 142 | Mounsey | Jane | janelymounsey@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |

| | A | B | C | D | E |
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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 143 | Du Val | Tim | tdv@dvency.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 144 | Willcock | Bill | wwillcock@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 145 | Gresham | Symonty a | symonty@symonty.org | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 146 | Croy | Jon | ioncroy@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 147 | Holgate | Zelda | zeldascott123@gmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 148 | Brown | Jordan | goducks@me.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 149 | Arnaud | Shauna and | shaunaarnaud@yahoo.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 150 | Meier | Tony | tony@windermere.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 151 | Miller | Tim | tim_s_miller@hotmail.com | 8/23/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 152 | Shaw | Gillian | icgs241@gmail.com | 8/24/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 153 | Wong | Allison | allisonwong123@gmail.com | 8/25/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 154 | Besand | Brian | brian.besand@gmail.com | 8/26/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 155 | Knapp | Dennis and | dknapp3140@aol.com | 8/26/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 156 | Ware | Adam | adampware@gmail.com | 8/26/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 157 | Schulz | Mark and M | toklat2@nwi.net | 8/26/2019 | Lived in Sunnyslope for 16 years. In April a neighboring home was sold and turned into an STR for up to 16 people which causes a negative impact on them. STR use is not compatible with residential neighborhoods. Completely against STR in the neighborhood. |
| 158 | Beaulieu | Jennifer | jenannbeau@gmail.com | 8/26/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 159 | Smith | Mike | miklorsmith@gmail.com | 8/27/2019 | Recently purchased a home in the Lake Wenatchee area to eventually retire in. Agrees that some of the proposed STR regulations make sense. Others such as bedroom limits are a blunt instrument. The 3 strikes rule and verified complaints are problematic. It could put the County in the middle of neighbor disputes. |
| 160 | Wakefield | Janice | janicew35@me.com | 8/27/2019 | Owned and operated a STR in Leavenworth area since 2009. Bought property with the express intention of running an STR. Has previously worked with the County in regards to STR issue. Would not own the property if it couldn't be an STR. The only time they have had noise issues was when non STR guests were staying at the location. |
| 161 | Hansen/Du | Dangy Edra | tdv@dvency.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 162 | Du Val | Allison | tdv@dvency.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 163 | Radovich | Nick and Kr | nick@jcrdevco.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 164 | Sprinker | Nancy | patamaplace@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 165 | Ropka | Ben and Sa | ben.ropka@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 166 | Valdes | Kaela | kv@seattlemetroagent.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 167 | Roy | Melissa | melissareneroy@hotmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |

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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 168 | Hurd | Stacey | staceyhurd@gmail.com | 8/27/2019 | Supports STR regulations. Their house in Plain used to be a nice area made up of families but it is all now just STR full of rude people who don't appreciate the neighbors. Common issues they have experienced include late night partying and noise, garbage not properly disposed attracting wildlife, trespassing. Rental companies do not address issues. Proposed noise regs seem a little wishy washy. How doesn't record and report noise at 2 am. Stronger verbiage is required. A floorplan of sleeping arrangement is not adequate. The number of guest should be restricted to the number of bedroom on building permits or septic systems. A 24 hour support line should be created. You should also be able to text that line to better document concerns. |
| 169 | Lynn | Bill and Kat | info@enchtdriverinn.com | 8/27/2019 | Have operated a BnB in Leavenworth area with a CUP from 2002 till 2017. Closed the BnB in 2017 for health reasons and started renting it as a STR. Their house is 5,000 sq ft and 6 bedrooms and 5 bathrooms and can sleep 14. The have never had an issue that resulted in a complaint to the police. Opposes STR regulations as it will eliminate their income source. |
| 170 | Fiorito | Stephanie | stephaniefiorito@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 171 | Shipman | Brian | cranehawk12@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 172 | Farrar | Tracy | tracy@paradiseontheriver.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 173 | Brown | Annette | leavenworthsl@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 174 | Cuthill | Stephanie | stephanie@leavenworthrealty.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 175 | Groen | Luke | luke.groen@kw.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 176 | Harrison | Karren | k.harrison.inc@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 177 | West | Ken | ken@leavenworthrealty.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 178 | Koopmans | Jacob | jacob.e.koopmans@gmail.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 179 | Glasenapp | Allen and J | allen@leavenworthrealty.com | 8/27/2019 | Has a neighboring property that is an STR. Overall has been good neighbors, and any issues of trespassing has been dealt with through a quick conversation. Does not believe the County has the legal authority to regulate STR and believes the actions are more motivated by revenue generation than concern for public impact. |
| 180 | Ericson | Denise | denise@comfycabins.com | 8/27/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. Has received calls in the past about their property and it has always been someone else, not one of their guests. |
| 181 | Simpson | Kristin | 2kristinsimpson@gmail.com | 8/27/2019 | Owens/operates STR outside of Leavenworth for past 4 year. Would like to point out that they employ many locals. The people who rent the STR spend money in town. If groups can't rent STR they will just go to different areas and tourism in the County will decline. They pay lodging taxes. They are not the enemy and love the County and the community. |
| 182 | Goodridge | Jennifer | j_goodridge@hotmail.com | 8/27/2019 | Owens/operates STR. Concerned about the STR regulations. Unclear about the problem the County is trying to resolve. If noise is the problem, consider properties with on-site owners to be self regulating and eliminating the fees. Also reduce or eliminate fees for units that only sleep 2. Noise complaints should be documented in decibels during the enforcement response, otherwise the three strikes is unfair. They have never had a complaint. |
| 183 | McMahon | Niki and De | dnmcMahon@nwi.net | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 184 | Davis | Reava and | reavadavis@gmail.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 185 | Latta | Tom | 4lattas@comcast.net | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |

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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 186 | Furrer | Tracie and | furrercabin@gmail.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 187 | Baker | Chad | ZayLyLodge@outlook.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 188 | Wagman | Kelly and L | kelly@tailspinners.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. Employ large amounts of people. Has a strict no party policy. Never had a complaint that resulted in a police response. |
| 189 | Whitten | Rob | plainhardware@hotmail.com | 8/28/2019 | Opposes STR regulations. Frustrated with layer upon layer of regulation. Existing laws already cover situational complaint issues. STR owners should not be treated any differently than anyone else. The County is charged with funding the Sheriffs department, if the Sherriff is underfunded and not able to respond, it is the County's fault. Their observation have been that month to month renters are much bigger problems than STR. Asks for data to show that STR are source of complaints. Is the STR fee just to help boost budgets? How is it in the budget before the county-wide STR regulations are enacted, it appears that the decision has already been made. In Plain and Lake Wenatchee, tourism is only economy, and the STR regulations would discourage tourism. The County Code does not allow other options for housing in the Plain, Lake Wenatchee area. No zoning that allows for multi-family or hotel development. Rural Commercial zoning is already built out. |
| 190 | Plannagan | Gary | gary@ospreyrafting.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 191 | Moody | JoAnee and | jumooddy@mac.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. Why can't the county educate people about the current code and then follow it? Why is the County discriminating against one group? |
| 192 | Rhodes | Rande and | yvonnerhds@aol.com | 8/28/2019 | Several neighbors operate STR. Have complained to the county about Speeding vehicles, noise, parties, trespassing, dog feces, and trash. Doug England stopped any response because the BCC didn't know how they wanted to handle STR yet. They have lost their privacy, safety, and security and they have no recourse other than calling the sheriff. |
| 193 | Gaughan | Paul | paularae22@frontier.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 194 | Williams | Matt | mattwilliamsbp@gmail.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 195 | Dillon | Brooke | brookelynnedillon@gmail.com | 8/28/2019 | Opposes STR regulations. Owns/operates STR. Signed form letter. |
| 196 | | | | | |
| 197 | | | | | |
| 198 | Green | Michelle | Jeffers, Danielson, Sonn & Aylward, P.S. | 8/14/2019 | Representing STRACC. Had submitted a Public Records Request to Chelan County Sheriff's Office for copies of all records regarding STR in Chelan County in the last 2 years. 26 records were provided by the sheriff. With 1500-1800 STR in the County, 26 incidents in the last two years is certainly not a major problem and their is no need to enact regulations for them. Of those 26 only 2 were legitimate incidents. The county's existing regulations are sufficient to deal with issues. Included is a copy of each of the 26 incidents that was provided by the Sherriff. |
| 199 | | | | | |
| 200 | Noble | Deborah | life.gardener@hotmail.com | 8/27/2019 | Opposes STR regulations. STR helps the County's economies. These regulations would hurt the middle class. |
| 201 | Thresher | Michael | ichael@thresherphotography.com | 8/27/2019 | Opposes STR Regulations. STR are important to the communities they are in and should have the support of the County. |
| 202 | | | | | |
| 203 | | | | | |

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| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 204 | Huffman | Susan | huffman@nwi.net | 7/24/2019 | Who would be enforcing the STR regulations? How does someone report and issued? Who keeps tally for the 3 strikes? Will the County enforce after the third strike? Parking requirements are not sufficient. Neighboring STR routinely have one car per bedroom or per guest. The fine is too low, and is often less than a weekend rental. Expand the 300 ft notice to are larger area. Trash and wildlife issue are a large concern in Leavenworth. What is one lot? Will the county STR regulations align with the City of Leavenworth in the UGA? |
| 205 | Loukusa | Kerwin | kerwinloukusa@gmail.com | 9/10/2019 | Number of STR vastly outweigh the number of long term rentals and it impacts the ability for people to live in the areas that are impacted by tourism. The proposed STR regulations are a good start but would like the County to look for ways to balance tourism and residency. Perhaps a tax for STR that goes to the community to build infrastructure and community amenities. |
| 206 | Morse | Stan | Stan Morse, Attorney at Law | 8/7/2019 | Offers several ways to improve the proposed STR regulations. |
| 207 | Kragt | Mallory | jmkragt@gmail.com | 7/24/2019 | Opposes STR regulations. The majority of the people who run STR are good law abiding citizens who contribute to the local economy. More appropriate to increase fines and enforcement. |
| 208 | Leavenworth | Friends of | Friends of Leavenworth | 7/24/2019 | Supports STR regulations. It is important to have a diversity of accommodation types, that diversity shouldn't come at the cost of the integrity of neighborhoods. Main concern with STR of whole houses without on-site owner. STR regulation needs clear statement of purpose to protect the integrity and character of residential neighborhood and ensure there is adequate housing for fulltime residents. Limit should be set at 4 bdrm and/or max of 10 people including children. Off-street parking requirement not adequate, all parking for STR should be off-street. Supports three stake rule. Density of STR in neighborhoods must be addressed. Include a list of code recommendations from the group. |
| 209 | Barton | Mary Pat | 611 Cedar St, Leavenworth, WA | | Home owners insurance is null and void if the property is used for STR (a commercial business). If owner or guest damages other properties the insurance doesn't cover it and restitution is very difficult. Need to require mandatory commercial insurance. |
| 210 | Haire | Karen | 1380 Commercial St, Leavenworth, WA | | STR regulations seem reasonable. They have an STR across the river from them and is used for loud parties. Have been woken up at midnight to loud music and people screaming. Has called police and they have shut it down but is hard for them to go back to sleep when they work at 3 am or 5 am. Figured out who managed the STR and called them up and haven't had a problem since. Its about the management not the property size. |
| 211 | Stanford | Mark | 2393 Kinnikinck Dr, Leavenworth, WA 98826 | | Supports STR regulations. President of Chiwawa River Pines HOA Board of Trustees. Lived there for 38 years. Currently the subdivision has 367 lots with 307 owners, about 32 are STR. Chiwawa River Pines went through the court system regarding STR. The majority of the owners in the subdivision are for some form of STR, however the board has received complaints about STR for noise, overcrowding, sewer, parking, property trespass, reckless driving, garbage and illegal fires. The Board supports the proposed STR regulations |
| 212 | Seaman | Shaun | 10463 Titus Rd Leavenworth | | Supports STR regulations. The 2017-2037 Chelan County Comp Plan Chapter 5 says there is enough housing stock for the next 20 years, but does that account for long term housing lost to STR. The goals and the policies of the Comp Plan are to promote affordable housing. The Comp Plan says that vacation rentals impact the character of a neighborhood and impact housing stock. |

| | A | B | C | D | E |
|-----|-----------|-------------|--|---------------|---|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 213 | Florea | Carl | Leavenworth | | Not fundamentally opposed to STR. Most issues they have heard from neighbors have to be about noise, parking, and garbage but there are other issues to consider too. STR significantly increase housing prices because people can make money off of them and therefore are able to afford a higher price. This also means that long term rentals are turning into STR because they can make more money. The preservation of housing stock is a goal of the Growth Management Act. An STR is not a residential use just as a hotel is not a residential use. STR should only be allowed in commercially zoned areas. A fee should be charged for each night a STR is rented that supports affordable housing. Just because the genie is out of the bottle doesn't mean it can't go back in. It happened with marijuana and can happen with STR. |
| 214 | Thrillby | Richard | | | Line 92 of draft contains a should that needs to be a must. Endorses Host Compliance as an invaluable tool that has been used in many other jurisdictions. |
| 215 | Blum | Kathy | 15 Helios Hills Lane, Manson, WA | | On behalf of Manson Community Council. Asks for a moratorium be placed on all STR permits within the Manson UGA. Concerned that STR regulations does not address density. STR regulations should address septic system issues. STR should be required to have land-line telephones as many areas do not have cell phone service. For STR on sewers, capacity should be 2 per bedrooms plus two additional person, should include anyone over the age of two in those calculations. Includes a memo from the Manson Community Council. |
| 216 | Johnson | Nola | 10196 Ski Hill Drive | 8/22/2019 | Supports STR regulations. Has had problems with neighboring properties that are STR including street racing in front of house. |
| 217 | Stroud | Steve | sstroud@nwi.net | 8/28/2019 | Supports STR regulations. STR are destroying neighborhoods. They create issues with traffic, noise, lights, over occupancy, and drunk rowdy behaviors. They are filling residential areas with commercial uses. Why is there a hotel in my neighborhood? Requests no STR in residential neighborhoods. Requests STR be permitted, licensed, inspected, regulated and taxed. Permits need to be contingent of neighborhood acceptance. Any county commissioner or planning commission member with an STR must recuse themselves from the final decision. |
| 218 | Sartin | Gabe | gabesartin@gmail.com | 8/28/2019 | Owens/operates an STR. Supports some amount of regulation. Feels like a solution is being proposed for a problem that is still unclear. What is the problem being addresses? Fees should be proportional to usage not a flat fee. Any fees should be paid through the lodging tax structure instead of creating a new process. |
| 219 | Beckley | Kari and Da | karibeckley@outlook.com | 8/28/2019 | Own/operates STRs. Opposes the requirement to have a responsible party within 30 minutes of the property. Opposes the permit fee. Opposes requirement to notify neighbors. Opposes the requirements of 1 STR per lot. Have appropriate off street parking. |
| 220 | Chicoine | Joe | joe.chicoine@gmail.com | 8/28/2019 | Supports STR regulations. Owns/operates an STR. Big players like VACASA are problems that only care about volume and turnover. Included several photos of issues with STR renters. |
| 221 | Monahan | Tom | celticcross3000@yahoo.com | 8/28/2019 | Opposes STR regulations. Owns/operates and STR. The STR regulations are government at its worst. |
| 222 | Murphy | Patrick | pmurph53@hotmail.com | Aug-19 | Supports STR regulations. Has experienced noise, yelling, outdoor music, outdoor floodlights, speeding cars, illegally parked cars, overflowing septic tanks, trespassing. Preference to ban STR. STR are destroying neighborhoods in Leavenworth. STR are commercial uses in residential areas. Economic benefit of STR is minimal as most are owned by no-residents as an investment property. Rejects the claim that STR will self regulate. Humans don't self regulate, that's why we need police, lawyers, and judges. Self regulations also puts the onus on the neighbors to report and takes away responsibility from the property owners. |

| | A | B | C | D | E |
|-----|-----------|------------|--|---------------|--|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 223 | Huffman | Susan | huffman@nwi.net | 8/28/2019 | Who would be enforcing the STR regulations? How does someone report and issued? Who keeps tally for the 3 strikes? Will the County enforce after the third strike? Parking requirements are not sufficient. Neighboring STR routinely have one car per bedroom or per guest. The fine is too low, and is often less than a weekend rental. Expand the 300 ft notice to are larger area. Trash and wildlife issue are a large concern in Leavenworth. What is one lot? Will the county STR regulations align with the City of Leavenworth in the UGA? |
| 224 | Hansen | Katie | katie@kadhanson.com | 8/28/2019 | Opposes STR regulations. The regulations would have a negative impact on their rental income because it would limit how many people they could rent to by limiting number of people per bedroom. Employs others to help with STR maintenance. |
| 225 | Fallon | Bob | bofballon@gmail.com | 8/28/2019 | Supports STR regulations. STR detract from neighborhoods and sense of community. They decrease the availability and increase cost of housing for full time residents. They occasionally are the sites of disturbances and detract from the health, welfare, and safety of citizens. The STR regulation needs density limitations. RR10 or denser, have to be primary residence of full time residence and the resident must be present when the property is rented. No more than 2 rented bedrooms per property. When allowed in residential zones, full house rentals must have no more than 4 bedrooms, renters of all ages county, and only register guests may be present. No person or entity may own more than one STR in the County. Density limitation mechanism must be developed. Larger STR allowed in commercial zones, and in agricultural and forester areas with a CUP. Likes Host Compliance as an enforcement mechanism. Includes links to several news articles about STR laws and regulations. |
| 226 | Tait | Shannon a | johannsmountainviewsuite@hotmail.com | 8/29/2019 | Supports STR regulations. Own/operates STR. Never had issues. Rely on income from STR. Some STR are giving the rest a bad name. |
| 227 | Hosford | Shawn | shawnhosford@comcast.net | 8/29/2019 | Owns/operates an STR. Rents out to Stevens pass employees in the winter and as an STR in the summer. |
| 228 | Gould | Bill | gouldw@charter.net | 8/28/2019 | Recommends that permits and CUP be required in phases starting with Leavenworth, as that is the area of largest concern, and CUP process takes time. What will happen if the County receives hundreds of application at once? A simple permit will still take time and again what happens if the county receives a thousand applications at once. Add back the plus 2 additional person to the occupancy portion of the code. Remove the response time requirements as it was made up by the commissioners and refer to the non-emergency response requirements within the CCC. No trespassing signs should be discouraged unless requested by neighbors. Why are permits and home inspections required annually, when a CUP is only required once. Remove the water and septic verification as it was completed when the home was built. STR permits should run with property like CUPs and be valid for longer amounts of time. Photographic evidence and videos can create conflict. Included a report by the California Economic Forecast, "The Effect of Short Term Rentals on Neighborhood Nuisance Complaints Along the Central Coast." |
| 229 | Fallon | Marty | martfallon@gmail.com | 8/28/2019 | Supports STR regulations. Proposed regulations needs to be more restrictive. The argument of not disrupting income flows for those who bought property for the sole purpose of turning the home into an STR is weak compared to the argument expressing the need to preserve residential neighborhoods. STR is a commercial use. Consider limiting full house STRs in densities of RR10 or smaller. |

| | A | B | C | D | E |
|-----|-----------|------------|--|---------------|--|
| 1 | Last Name | First Name | Contact | Date Received | Comment |
| 230 | Savina | Leslie | lesliesavina@comcast.net | 9/3/2019 | Supports STR regulations. The proposed regulations appear reasonable on paper but in practice will not curb the negative impacts. Example: having a 30 minute requirement is great but when you are disturbed in the middle of the night by a loud party the damage is already done. Only limiting STR will alleviate the problem. Consider what other communities have done: limiting the nights in a year that an STR may be rented; not permitting additional STR within a distance of an existing STR. STR are no longer supplemental income for property owners but primary income for business owners in residential areas. Renters have no motivation to be good neighbors. They are loud, trespass, litter, let dogs run loose, get stuck in the snow, illegally park. |
| 231 | Stoller | Heidi | stollerheart@gmail.com | 9/6/2019 | Asks about what is happening with STR regulations and what is required to start an STR. Not fair to charge same fee for those who rent out a room in a house as those who rent a whole house. |
| 232 | McMahon | Niki | dnmcmahon@nwi.net | 9/1/2019 | Opposes STR regulations. Owns/operates a STR. Built a home specifically to be an STR for the income. Home is surrounded by STR. Sometime it is noisy but they are on vacation and they have never called the police or property owner on them. A few bad owners have given the rest of STR owner a bad name. |
| 233 | Clute | Roger | rcandmac@nwi.net | 9/8/2019 | A portion of the hotel/motel tax that is collect on STR should go to the area the STR is in to support code and law enforcement in that area. |

9 Attachment D: Community Proposals

Don't want in URL, STRs existing in this zone currently
Don't want in planned development
Should be in Commercial

FINAL
2-8-20

GENERAL

An annual Short Term Rental (STR) permit is required for all STR's - regardless of zoning. STR property registration fees should be figured on a sliding scale of a "per bedroom" fee. Larger properties are harder to mitigate and take more resources. Limit of 10 people or fewer; including children of all ages. The International Building Code considers all persons regardless of age.

Maximum of 4 bedrooms. Five bedrooms or more are not allowed in residential zones, only in commercially zoned areas. Sign must be posted outside the entrance of home by that includes: Permit number, expiration date, maximum occupancy, name & phone number of person to contact in case of problems. Response time for complaints must be within 30 minutes.

New construction for a single-family home building permit cannot be used as a STR for 5 years. When a homeowner goes to the County and signs the building permit for a "single family home," that designation must be honored following construction for a period of time. This will encourage community cohesiveness and good neighborhood and discourage those who only want to buy into our small rural communities for monetary gain, with complete disregard for existing homes and families. Additionally, this encourages the possibility of those homes being placed into long term, monthly rentals. Current STR permits are not transferable if the property is sold. New owners must reapply for a new STR Permit. STR's should honor and maintain the character of surrounding neighborhoods.

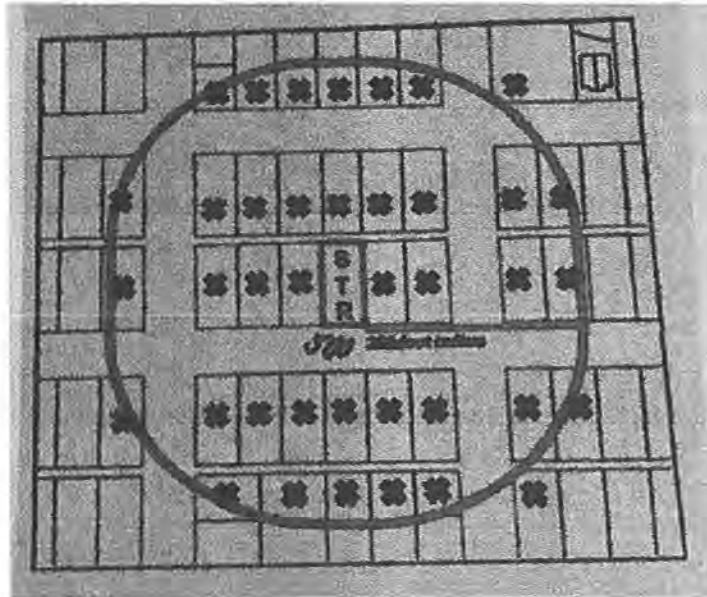
MANSON USE CHART

The Manson UGA Use Chart should be changed to reflect the changes outlined in this document.

LIMITING THE NUMBER OF STR'S PER NEIGHBORHOOD

For STR applications, there shall be at least 500 feet of separation between properties permit is STR's. This 500 foot of separation is measured radiantly from the STR property boundary (see figure below). This separation includes all properties that are wholly or partially within that radius (all properties in the figure with an "x" Shown

below). If one property within 500 feet of your property is an approved STR, your property cannot be approved as a new short term rental until the existing STR permit terminates.



Once the capacity of the STR's has been determined by Chelan County within Manson's Urban Growth Area, new STR's can only be designated and licensed once a slot becomes available. A lottery system should be used to determine if and when another property may apply within the 500 foot radius (upon termination of the existing STR permit).

COMPLIANCE

All owners of property used for STR's shall comply with the Manson UGA, Chelan County Codes, and the State of Washington requirements under the RCW.

PROPERTY MANAGEMENT

Property Management Plan. A property management plan demonstrates how the vacation rental will be managed and how it impacts neighboring properties. It shall be submitted for review and approval as part of the permitting process. The property management plan shall address (but not limited to) points of contact available to respond immediately to complaints,

garbage pick-up, instructions on septic use (if not on a sewer system), good neighbor policies (including addressing noise), and if there is direct access to a Lake Chelan, water and boating safety as well as how to keep our lake clean. It will be posted in a visible location within the vacation rental and a copy will be available with point of contact for problem resolution.

Requirements. The vacation rental shall meet all applicable state and local health, safety and building codes.

Property Manager. STR's must have a local property manager who is available 24 hours per day during periods the property is rented. The property manager must ensure compliance with all requirements set forth in this code, including timely response (within 30 minutes) to all complaints and their resolution.

Adjacent Notification. Upon approval by Chelan County of an STR, the owner or property manager will provide a notice by US mail to all adjoining property owners within a 500 foot radius of the property boundaries as a condition of license approval. This notice will include the UBI number, county registration number, current telephone number of the required in property landline, and a contact name and number of the owner or property manager that can respond to issues within the required period.

Right To Farm. For STR's abutting or adjacent to farm or orchard land, any inconvenience or discomfort arising from a properly conducted agricultural operation on agricultural land will not be considered a nuisance for purposes of Chelan County codes. STR tenants should be advised and prepared to accept such inconvenience or discomfort as a normal and necessary aspect of living in a county with a strong rural character and an active agricultural sector. This shall be disclosed in the Property Management Plan and should be disclosed in the rental agreement.

MAXIMUM OCCUPANCY

STR Property on Public Sewer

STR's served with public sewer shall not exceed 14 overnight guests, provided the rental meets the bedroom number standards as per Table 1. below.

STR Property with on-site septic system

STR's served by an on-site septic system shall not exceed 10 overnight guests, provided the rental meets the bedroom number standards as per Table 2. below. See specific entry below for properties served by an on-site septic system.

| Table 1. Maximum Occupancy and Parking Requirements Rentals with Public Sewer | | |
|--|--------------------------|------------------------|
| Number of Bedrooms | Maximum Occupancy | On-Site Parking |
| 1 | 4 | 1 |
| 2 | 8 | 2 |
| 3 | 10 | 3 |
| 4 | 12 | 4 |
| 5 or more | 14 | 5 |

| Table 2. Maximum Occupancy and Parking Requirements Rentals with On-Site Septic Systems | | |
|--|--------------------------|------------------------|
| Number of Bedrooms | Maximum Occupancy | On-Site Parking |
| 1 | 2 | 1 |
| 2 | 4 | 2 |
| 3 | 6 | 3 |
| 4 | 8 | 4 |
| 5 or more | 10 | 5 |

NOTE: 5 or more bedrooms only allowed in CT and CD

Septic Systems

For those applications where the proposed STR is serviced by a septic system, STR Permit applications must include annual certification from Chelan/Douglas County Health Department that the on-site septic systems are adequate for the maximum occupancy of home.

Parking

Off street parking should be required on a "per bedroom" basis (see Table 1 or 2 above). One parking space per bedroom, as determined by the fire marshal to legally be used as a bedroom. All parking must be off street; no street parking is allowed. This includes recreational vehicles, boat and jet ski trailers, etc. Parking will be consistent with chapter 11.90 Chelan County Code.

Pets

Pets outside of the rental structure will be secured at all times, either by STR

permanent fencing or a leash. Nuisance barking or noise from the pet is prohibited.

SIGNAGE

One sign either attached to the dwelling or placed in front of the dwelling and containing no larger than 4 square foot is permitted. No off site signage or advertising is permitted.

On properties containing both residential dwelling and an accessory residential dwelling or dwellings, only one structure may be rented out as a short-term vacation rental. All businesses identifier number and the names and addresses of the property owner and agents authorized to act on the property owners behalf;
Display the address of the residence so that it is clearly visible from the street or access road.

GARBAGE

All garbage must be screened from view from the street and neighbors, inaccessible to wildlife, and put out for collection only on the day of collection. Trash cans must be removed from the street within 24 hours of collection.

NOISE

STR's must comply with County and State noise ordinances which are clearly stated in Chelan County Code 7.35, regardless of time of day.

FIRE SAFETY

Annual on-site fire inspection must be performed by Fire Marshal as part of the annual STR Permit Application Process. Home must have current and adequate fire safety equipment and evacuation routes from the home posted clearly.

Additionally, outdoor fireplaces or fire pits must be able to be locked. The property manager or owner will ensure the outdoor fireplace or fire pit is closed and locked immediately during periods of a burn ban.

VIOLATION AND REPEAT OFFENSES

A short term rental of a home, apartment, accessory unit, or room without a permit from Chelan County Community Development and/or without a Washington State business

license will be fined in accordance with Title 17 of the CCC.

Failure of the owner, authorized agent, or local contact of a short term rental to respond to a complaint made to the Chelan County Sheriff Department arising out of the occupancy and use of short term rental by a tenant, or tenant's visitors or guests, is considered a violation and will be fined as follows:

1st Complaint & Violation Received: Written Warning

2nd Complaint & Violation Received: \$750 FINE

3rd Complaint & Violation Received: \$1000 FINE

4th Complaint & Violation Received: PERMIT REVOKED

In addition to any other remedy provided by this chapter, a short term rental permit and license issued pursuant to this chapter may be suspended, modify, or revoked for violations of this chapter, for violation of any other lot on the premise of a short term rental, or the maintenance of such other conditions as maybe shown to be in the interest to the public health and safety.

All STR is must register with the state of Washington Department of Revenue and show proof when applying for a Chelan County STR permit.

PROPERTY ACCESS

The road access to the vacation rental shall be constructed to meet minimum Chelan County road standards and shall be adequately maintained and clear of obstructions, including illegally parked cars, recreational vehicles, boats, trailers, junk/abandoned/unlicensed vehicles, etc., to ensure unimpeded passage of emergency vehicles and other vehicle or traffic.

If there is a legal easement that provides renters access to off site areas (such as a beach access), this shall be indicated on a map in the property management plan and the easement shall be clearly marked.

PHONE SERVICE

The vacation rental shall have a working landline with local phone service that can be found in the Rivercom 911 database. The phone number servicing the vacation rental shall be included on the property management plan.

SWIMMING POOL/HOT TUBS

Swimming pool and hot tub usage is *limited to registered guests only*. This is standard policy for all licensed hotels and motels, as it's necessary for controlling noise and large parties. Pools & hot tubs must be continuously managed by a company that has been approved by the Chelan/Douglas County Health Department during the months the property is rented. Properties with pools must adhere to Chelan County codes regarding barriers, safety, hygiene, etc.



Vacation Rentals in Bend Oregon

*Bend
from a
STR -
mng.*

*letter for a mng person
to a renter*

Questions? 541.241.6676

HOME

in the heart of Bend

VACATION HOMES

HOME LOCATIONS & MAP

RESERVATION CALENDAR | RESERVE HERE

CONTACT US!

Find the perfect
Bend home for
your stay

Arriving



Nights



Location



Bedrooms



Daily Price From



Daily Price To



☐ Pet Friendly

☐ Air Conditioning

Bend's Good Neighbor Guidelines

These homes are located in some of Bend's best downtown neighborhoods. We are serious about preserving these great neighborhoods for peaceful living and enjoyment of all residents and visitors! These are not party houses and you are required to observe the strict occupancy limits and quiet hours of 10pm to 8am.

All guests are required to follow the City of Bend's Good Neighbor Guidelines. They are posted here and at the home:

We have strict penalties for violations of the Good Neighbor

- ☐ Fireplace
- ☐ Jacuzzi
- ☐ King Bed
- ☐ Monthly Rental

Property Name or ID

Display Results



Khaya

3 Bedrm, 2.5 Bath, House
Westside Downtown Bend
Newport Neighborhood



Bernhard Justice Bungalow

3 Bedrm, 2 Bath, Cottage
Historic Downtown Bend



Cinder Cone Cottage

2 Bedrm, 1 Bath, Cottage



CITY OF BEND

Short Term Rental Operating License Good Neighbor Guidelines

The Good Neighbor Guidelines (GNG) were created to educate Short Term Rental (STR) owners and tenants/guests on the importance of being a good neighbor. Welcome neighbors! Be nice, you're in Bend!

1. **24-Hour Contact Information.** If at any time you have concerns about your stay or in regards to your neighbors, please call the 24-hour contact number listed in the rental lease agreement or posted in the unit. In the event of an emergency, please call 911.
2. **General Respect for Neighbors.** Be friendly, courteous, and treat your neighbors like you want to be treated. Respect your neighbors and their property.
3. **Noise.** Be considerate of the neighborhood and your neighbor's right to the quiet enjoyment of their home and property, especially after 10 p.m.
4. **Maintenance of Property.** Be sure to pick up after yourself and keep the property clean, presentable and free of trash.
5. **Garbage Disposal.** Place trash and recycling containers at the appropriate place and time for pickup. Return trash and recycling containers to the designated location within 12 hours after pickup. Cigarette butts should be properly extinguished and disposed of in the garbage.
6. **Parking & Traffic Safety.** Refer to the parking diagram posted in the unit and park on-site whenever possible. Do not park on lawns or in a manner which blocks driveways, sidewalks, alleys or mailboxes. Drive slowly through neighborhoods and watch for pedestrians and children playing.
7. **Pets.** Promptly clean-up after your pets. Prevent excessive and prolonged barking, and keep pets from roaming the neighborhood. Control aggressive pets, and be sure to abide by the local leash laws. Store pet food indoors and in a secure container to reduce the likelihood of unwanted pest problems.
8. **Tenant/Guest Responsibility.** Approved guests and visitors are expected to follow the Good Neighbor Guidelines. Be sure to read your rental agreement for additional terms and restrictions which may include consequences for violating the Good Neighbor Guidelines.

Guidelines

lines and/or your rental contract. If you are found in violation of the rules, you may be asked to leave the home immediately with loss of deposit and rents without refund. We licensed by the City of Bend and our license depends on guest behavior.

Remember

homes

away

have

Remember...you're in Bend! Be nice! Please respect these loved homes and neighborhoods as your own and enjoy your home away from home.

Have a great time and enjoy Bend! Hope to see you soon!



Planning Department
201 1st Avenue East
Kalispell, MT 59901
Phone: (406) 758-7940
Fax: (406) 758-7739
www.kalispell.com/planning

November 28, 2018

Amunda & Ryan Pokorny
485 3rd Ave WN
Kalispell, MT 59901

RE: Short Term Rental @ 485 3rd Ave WN - FIRST NOTICE

Dear Mr. & Mrs. Pokorny:

We wanted to let you know that the Kalispell City Council recently enacted an ordinance addressing short term residential rentals (VRBOs, Airbnbs, etc) after focusing on the issue at a series of public meetings from April through December of 2016. The ordinance generally allows short term rentals in any residential home or dwelling unit provided that several conditions are met and a permit is obtained. It appears that you are listing on one of these sites, but have not yet applied for a permit.

The permit process helps ensure that those conditions are satisfied. The conditions set by the Council include: (1) a fire/building code inspection of the home; (2) checking that health department and state bed tax requirements are met; (3) that there are parking spaces on the property that would be required for a home in that location; (4) an affirmation that private covenants do not prohibit a short term rental; and (5) that contact information for the owner or their representative be included in the notice sent to property owners within 150 feet of the rental.

There are a number of documents that are available on our website. The permit application is available on-line at <http://www.kalispell.com/files/central-business-center/2018/02/28/Short-Term-Residential-Rental-Application-NEW>.

There is also a link to the checklist used by the fire inspector when he does his inspection. It is available at <http://www.kalispell.com/files/central-business-center/2018/02/28/Short-Term-Rental-Fire-Inspection-Checklist-PDF>.

Please contact us by December 12, 2018 to start the permit process and let us know if you have any questions.

Sincerely,

PJ Sorensen
Kalispell Planning Department



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250

(360) 378-2354 | (360) 378-2116

dcd@sanjuanco.com | www.sanjuanco.com

Vacation Rental Permit Application Checklist

Provisional (administrative) Permit or Conditional Use Permit

Application Checklist

- ☐ A completed Vacation Rental Permit Application and Checklist
- ☐ A signed and notarized agent authorization letter, if submitted by an agent (see SJCC 18.80.020.C.2);
- ☐ A legal description of the site and/or San Juan County Assessor's information for the property (available here: [Polaris Mapping Application](#); search address, click on the "I" information icon and then click on your parcel; scroll to links on assessor site and/or recorded documents to find this information.)
- ☐ Narrative description of proposal; surrounding land uses; and how the proposal is consistent with the applicable regulations and permit approval requirements.
- ☐ A copy of a County approved sewage disposal permit (available here www.sanjuanco.com/432);
- ☐ Floor plan(s) showing the use of all of the rooms, including bedrooms, in the structure(s) that will be used for the vacation rental. Plans should be drawn on 11" X 17" or smaller size paper;
- ☐ A property management plan including the following (see SJCC 18.40.275(K)(1)):
 - ☐ Rules of conduct, see SJCC 18.40.275(C) that address trespassing, noise, off-site parking issues, speeding on access roads, burn ban, and water conservation;
 - ☐ Unified Business Identifier number, and the names and addresses of the property owner and agents authorized to act on the property owner's behalf;
 - ☐ A designated local property representative who lives on the island where the vacation rental is located and will respond to complaints and emergencies; and
 - ☐ A valid telephone number where the local property representative can be reached twenty-four (24) hours per day.
- ☐ Applicable fee: www.sanjuanco.com/documentCenter/View/1683/Permit-Fees-PDF?bidId= and
- ☐ A site plan containing the following information:
 - ☐ Site plan printed on 11" X 17" (or smaller) paper;
 - ☐ North arrow and drawn to a standard engineering scale (1" = 40' for parcels over one acre in area and 1" = 20' for parcels under 1 acre);
 - ☐ Location of all existing structures, driveways, septic system components and significant features on the subject property and on adjacent properties;
 - ☐ All structures where vacation rental bedrooms are located should be marked on the site plan;
 - ☐ Property lines, adjoining streets, and immediately adjoining properties and their ownership;
 - ☐ Location and dimension of required parking spaces; and
 - ☐ Title block with the project name and address, drawing title, tax parcel number, and the name/address/phone of the person preparing drawing.

All the above is required for a complete application. If any information is missing, the Department of Community Development will not be able to begin the review process.



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250

(360) 378-2354 | (360) 378-2116

dcd@sanjuanco.com | www.sanjuanco.com

Land Use Vacation Rental (VR) Permit Application

PROPERTY INFORMATION

| | |
|-------------------------------|---|
| Tax Parcel Number | Island: |
| Designation | Subdivision/Lot # |
| Water Body | Shoreline: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Acreage: |
| Street Address (if assigned): | |
| Directions to Property: | |

APPLICANT INFORMATION

| | |
|-------------------|-------------|
| Name of Owner(s): | Email: |
| Mailing Address: | Phone: |
| City: | State: Zip: |

CONTACT/AGENT INFORMATION (THIS IS THE PERSON TO BE CONTACTED ABOUT MATTERS PERTAINING TO THIS PERMIT APPLICATION)

| | |
|------------------------|-------------|
| Name of Contact/Agent: | Email: |
| Mailing Address: | Phone: |
| City: | State: Zip: |

ADDITION INFORMATION

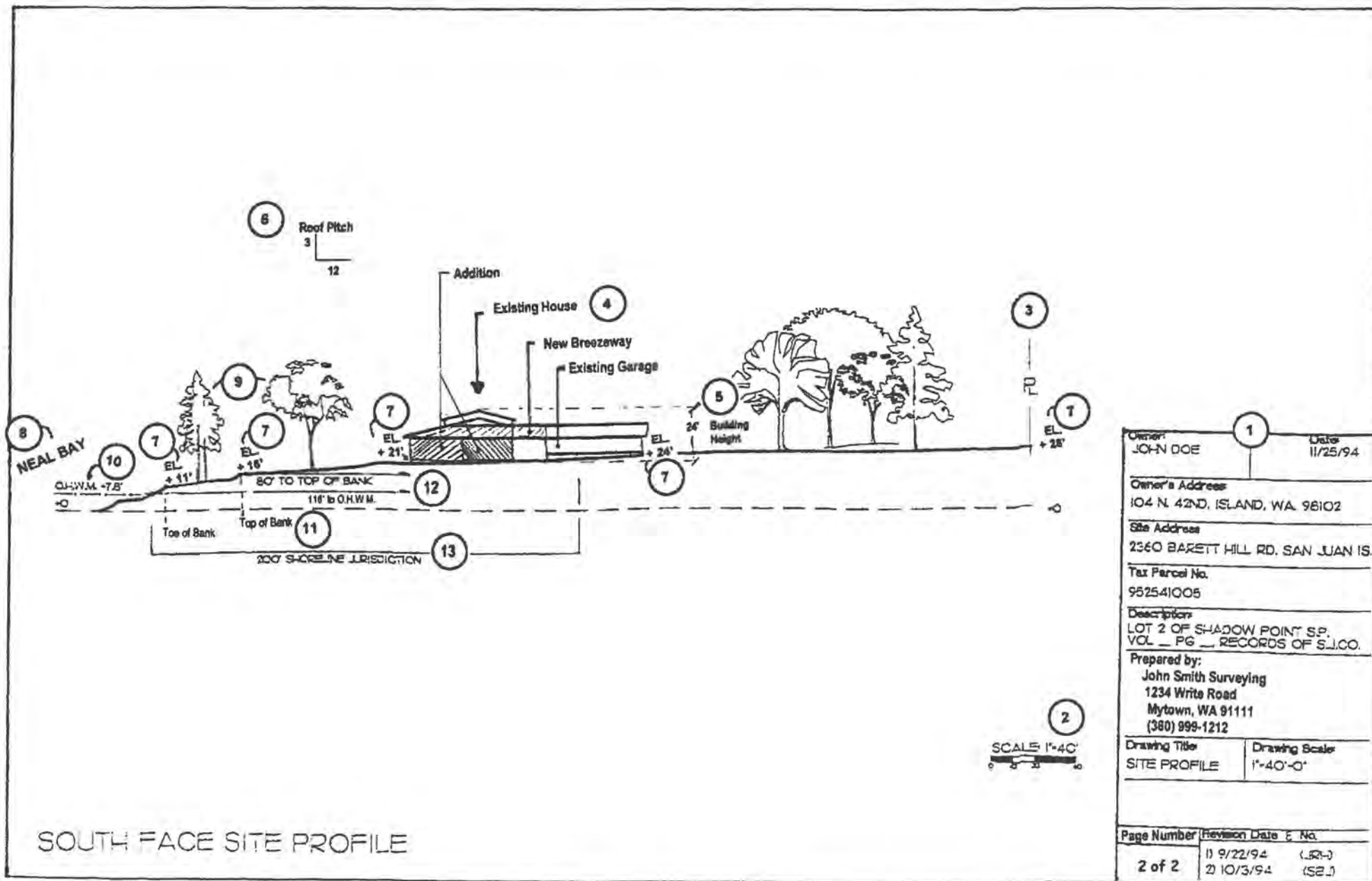
| | |
|---------------------------------------|--|
| # of bedrooms proposed in the VR? | Is there an accessory dwelling (ADU) unit on the property? |
| # of guests to be hosted in the VR? | Do you propose to rent the SFR (home) or ADU? |
| # of on-site parking spaces proposed? | What year was the ADU built? |

PERMIT CERTIFICATION (Must be signed by all property owners or a signed and notarized agent authorization provided.)

1. I have examined this application and attachments and know the same to be true and correct, and certify that this application is being made with the full knowledge and consent of all owners of the affected property. (Attach an additional signature sheet if necessary)

| | | |
|------------------|--------------|--|
| Signature | Printed Name | Date |
| Signature | Printed Name | Date |
| For DCD Use Only | | Complete Application: <input type="checkbox"/> YES <input type="checkbox"/> NO |

| | |
|------------|--|
| DATE STAMP | FOR STAFF USE ONLY |
| | Amount Paid: Receipt #: SEPA Exempt Code Citation: Inspection Required: <input type="checkbox"/> YES <input type="checkbox"/> NO |
| | <input type="checkbox"/> Approved By: Date: <input type="checkbox"/> Denied |



SOUTH FACE SITE PROFILE



SAN JUAN COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT

135 Rhone Street, PO Box 947, Friday Harbor, WA 98250

(360) 378-2354 | (360) 378-2116

dcd@sanjuanco.com | www.sanjuanco.com

Vacation Rental Permitting Process

The purpose for requiring a permit to conduct land uses is to ensure that they are compatible with County land use and development regulations.

All Permits

After an application, fees, and required attachments and information are submitted, DCD has 28 days to determine whether the application is complete. If it is not complete, the applicant has 90 days to provide all missing information. Once the application is complete, DCD will begin processing it. The County must publish a notice of application in the local paper, and the applicant must post a notice on the property and mail the notice to adjacent property owners.

If approved, prior to operation, the applicant must have the driveway inspected by the SJC Fire Marshal; call (360) 378-3473, or make your request by e-mail to dcd@sanjuanco.com.

An annual certification of compliance is required to maintain the permit (SJCC 18.40.275 (K)(4)).

If you wish to convey the permit upon sale, please follow SJCC 18.40.275 (K)(5).

Your land use designation will determine which permit type you will be required to apply under, Provisional or Conditional. Each is explained below.

Provisional Permit

After the public comment period, DCD staff determine whether the project is consistent with the County land use and development codes and the criteria for approval. At that point the application may be approved, approved with conditions, or denied. There is no public hearing. The decision may be appealed by any party of record to the County Hearing Examiner by filing a written appeal and appropriate fees within 21 days of the decision.

Conditional Use Permit

When all necessary information has been submitted, DCD staff will schedule a public hearing before the San Juan County Hearing Examiner. At least 10 days prior to the hearing staff will issue a staff report analyzing the proposal for consistency with code requirements and the criteria for approval. At the public hearing, the Hearing Examiner will review the staff report, the applicant's presentation, and all public testimony and, after the hearing is closed, determine whether the proposal is consistent with the criteria for approval. The Hearing Examiner may approve, approve with conditions, or deny the application. For shoreline permits a notice of the decision is sent to the Dept. of Ecology and for variance and conditional use permit applications, within 30 days of transmittal they make the final decision. The Hearing Examiner's action on all except shoreline permits may be appealed to Superior Court in accordance with the requirements of the Land Use Petition Act. Appeals of shoreline substantial development permits must be submitted to the Shoreline Hearings Board within 28 days of the transmittal to Ecology, and shoreline variances and conditional use permits, must be submitted within 28 days the Ecology's final decision.

Criteria for Approval

Provisional Use Permits

1. The provisional use permit application shall only be approved by the administrator if the use has been reviewed for consistency with the applicable sections of this code (e.g., Chapter 18.40 SJCC, Performance Standards, Chapter 18.50 SJCC, Shoreline Master Program, and Chapter 18.60 SJCC, Development Standards) and found to meet the requirements set forth by this code; and
 2. Any provisional use application (not including short subdivisions) involving property located within the jurisdiction of the state Shoreline Management Act but not requiring a shoreline permit must conform to the policies in Element 3 of the Comprehensive Plan and the applicable regulations in Chapter 18.50 SJCC (the Shoreline Master Program).
-

Conditional Use Permits

1. The proposed use will not be contrary to the intent or purposes and regulations of this code or the Comprehensive Plan;
2. The proposal is appropriate in design, character and appearance with the goals and policies for the land use designation in which the proposed use is located;
3. The proposed use will not cause significant adverse impacts on the human or natural environments that cannot be mitigated by conditions of approval;
4. The cumulative impact of additional requests for like actions (the total of the conditional uses over time or space) will not produce significant adverse effects to the environment that cannot be mitigated by conditions of approval;
5. The proposal will be served by adequate facilities including access, fire protection, water, stormwater control, and sewage disposal facilities;
6. The location, size, and height of buildings, structures, walls and fences, and screening vegetation associated with the proposed use shall not unreasonably interfere with allowable development or use of neighboring properties;
7. The pedestrian and vehicular traffic associated with the conditional use will not be hazardous to existing and anticipated traffic in the neighborhood;
8. The proposal complies with the performance standards set forth in Chapter 18.40 SJCC;
9. The proposal does not include any use or activity that would result in the siting of an incompatible use adjacent to an airport or airfield (RCW 36.70.547); and
10. The proposal conforms to the development standards in Chapter 18.60 SJCC.

From: Lilith Vespier <dsmanager@cityofleavenworth.com>

Sent: Tuesday, February 18, 2020 5:31 PM

To: Bob Bugert <Bob.Bugert@CO.CHELAN.WA.US>

Subject: Vacation Rentals

Joel shared your proposed code conditions with me and said you were open to comment. I've put a few thoughts below. No need to reply but I am open to meeting and discussing. I'll be back from vacation in March.

1. Short-term rentals must be operated out of a person's primary residence only.
 - a. Consider allowing in the ADU, this is an efficient use of a separate space and retains one local resident per parcel.
2. The Chelan-Douglas Health District and Fire Marshall must inspect....
 - a. Why the CDHD? If they are confirming the number of bedrooms for the septic that could be streamlined to the application review. Practicably, this will save a lot of expense for the CDHD.
3. The number of cars allowed at the short-term rental will be limited to the number of sleeping units (bedrooms) plus one.
 - a. Why add one? It would encourage use of other rooms for beds and discourage carpooling.
4. Advertise lodging will have no more than two overnight guests per bedroom pls additional three overnight guests.....
 - a. Similar to the parking this encourages the use of other rooms for beds which in turn impacts the septic, noise, and neighborhood character.
5. The sign must be made of natural materials....
 - a. If you limit the size, as proposed, and limit the colors it will remove bold impacting sizes.
6. Rules of conduct approved by the County
 - a. Not sure you want to be in the business of conduct approval which is already regulated by the sheriff.
7. A designated local property representative who lives within 30 minutes....
 - a. This will remove remote rentals which are the types of rentals with the least impact – no or remote neighbors
8. Certify compliance with the conditions of license approval within 90 days after the closing date of the sale of the property...
 - a. Difficult to track and enforce.... These should be treated the same as a conditional use permit which runs with the land and anyone operating would need to comply with the conditions. This removes the potential for loss of an approved short term rental with the sale (affecting the sale value). If the County wants to limit permits or remove existing units there are other more transparent options.
9. Complaints to the commissioners should not be used for enforcement rather all complaints should go only to code compliance officer. Single point for complaints will improve accountability and follow through. I understand that serious issues and noise may go to the sheriff but if the sheriff files a report those should go to the code compliance officer for action.
10. The third verified violation of this code section will result in a one year suspension of the County permit. Current permits for Manson are January to December (even if they don't apply until July they end in December). This violation process indicates a change to multiple start/end permit dates. I would recommend retaining the valid permit through December regardless of the

application/approval date. Then the third violation would be revoking existing permit and not permitting application for the next calendar year.

11. 1% cap... if you tie to January 1st, the number will change year to year and result in confusion and lack of certainty. Consider permitting all who apply in the first 6-12 months and reducing that number by xx% per year to reduce the total or a specific number per region (like Lake Chelan) or other options.

The major issue with these permit is enforcement. Therefore the way the rules are drafted will require careful consideration of how enforcement issues will play out. I didn't know the State had adopted RCW 64.37. The State has identified and provided remedy for enforcement through the RCW. It will be interesting to see how the consultant combines the County objectives and processes with the RCW.

I wish you all the best,

Lilith Vespier, AICP
Development Services Manager

City of Leavenworth

Development Services Department
700 US Highway 2 | PO Box 287
Leavenworth, Washington 98826
P 509.548.5275 ext. 131 | F 509.548.6429
www.cityofleavenworth.com

NEW SECTION 11.101 SHORT TERM RENTAL OPERATING REGISTRY

11.101.010 Purpose

A. The purpose of this chapter is to establish regulations for the operation of short-term rentals as defined herein, within the unincorporated portions of Chelan County. This chapter also establishes a short-term rental registration process.

B. The provisions of this chapter are necessary to promote the public health and safety by protecting year-round residents' enjoyment of their homes and neighborhoods by minimizing the impact of short-term rentals on adjacent residences.

11.101.015 RCW 64.37 Adopted by Reference

All provisions of RCW 64.37 are adopted by reference.

11.101.020 Definitions

For the purposes of this chapter only, the definitions found in RCW 64.37 are adopted.

11.101.030 Applicability

A. Short-term rentals are a permitted use in all rural, residential, and resource zones in Chelan County.

B. All allowed short-term rentals must be registered consistent with Chelan County Code Section 11.101.040.

11.101.035 Maximum occupancy allowed

The maximum number occupants shall not exceed two persons per bedroom, plus four, provided that the standards of the Chelan-Douglas Health district and the Chelan County Fire Marshal are met.

11.101.040 Annual Registration

A. No owner of property within the unincorporated portions of Chelan County may advertise, offer, operate, rent, or otherwise make available or allow any other person to make available for occupancy or use a short-term rental without a valid short-term rental registration. Annual renewal is required.

B. Short-Term Rental Operator Records and Advertisement: The short-term rental registration number shall be listed on all short-term rental advertisements. Every short-term rental owner or authorized agent shall maintain records of guest names and their contact information and revenue earned to assist with enforcement of this chapter.

11.101.050 Application and Fee

46
47 A. Application Required. Applications for registration shall be on forms provided by the County,
48 demonstrating the application meets the standards required by this chapter.
49

50 B. Registration Fee. The fee for application for a short-term rental registration or registration renewal shall be
51 an amount to recover the County's actual average costs of reviewing and issuing the registration or registration
52 renewal application, including a fee for a late application, investigation, and any required inspections, as
53 established by resolution of the Board of County Commissioners.
54

55 11.101.060 Term of Annual License and Transferability

56

57 A. Term. A short-term rental registration shall be issued for a period of one year, with its effective date
58 running from the date the application is due as set forth in 11.101.070 and shall be renewed annually by the
59 owner or authorized agent provided all applicable standards of this chapter are met.
60

61
62 B. Transferability. The registration shall be issued in the name of the property owner and is transferable to a
63 new owner. The new owner or authorized agent shall have 60 days to update owner and contact
64 information to continue operation until the registration deadline. New owners must apply for a new
65 registration by the annual deadline. The registration shall terminate and be deemed void if the new
66 property owner does not update contact information within 60 days when the registration holder sells or
67 transfers the property.

68 69 70 11.101.070 Registration and License Renewal

71

72 A. A registration and number shall be obtained and/or renewed as required in this section. The ability to
73 operate a short-term rental in the County shall be discontinued for failure to obtain or renew a license to
74 operate as provided in this chapter.
75

76 B. Application and Renewal Application Process. A person engaging in a short-term rental who has not yet
77 obtained a registration, or who is required to renew an existing registration, shall do so as follows:
78

79 1. Time for Application.

80

81 a. New Permits. For new registrations applied for after the effective date of this chapter,
82 license applications must be submitted by November 1 for the following operating year.
83

84 b. Renewals. Renewal forms of licenses of registered STRs shall be submitted by December
85 1 for the following operating year, and annually every year thereafter.
86

87 c. Upon change in ownership of a property subject to a short-term rental registration, it is
88 the obligation and responsibility of the new owner or authorized agent to obtain a new
89 registration to operate the short-term rental by the annual deadline. The new owner or
90 authorized agent may operate for the remainder of the calendar year provided that the
91 new owner shall have 60 days from the date of ownership (closing of the sale) to update
92 owner and contact information on file with the County.
93

94 C. Notice – Late Applications. If the license application or renewal application is not received by the
95 expiration date, the County shall send notice of expiration to the owner and authorized agent, if known,
96 of any property for which a timely application has not been received, advising the owner that they have
97 30 days to renew.

98
99
100
101
102

11.101.080 Internet advertising must include registration number.

Any advertising of a short-term rental whether in print or on the Internet, including listings on short term rental platforms shall include the registration number provided for herein.

DRAFT

days to respond. An application will be considered timely submitted if the County receives a completed application, accompanied by the required fees, within the 30-day late period.

D. License Expiration.

1. All registrations will expire Dec. 31 of each year.

2. Late renewals. Renewal applications shall be received by December 1st. If fees are not paid by Feb. 1st, the operator has until March 1st the ability to operate shall be discontinued.

3. For transfer of property to new owners, once the 60-day grace period to update owner and contact information for a current license expires as referenced in subsection (B)(1)(c) of this section, or the new application deadline lapses, the ability to operate shall be discontinued with no further action by the County.

E. Renewal Standards.

1. The County will review an application for registration renewal and issue a renewal provided all the criteria of approval in Chapter 5.15.080 continue to be met. If not met, or documented nuisances or complaints are on file regarding the Short Term Rental, the County reserves the right to deny the renewal of the registration and the property shall not be used as a short-term rental.

2. A decision on a registration application or renewal may be appealed as provided in Title 14, Chelan County Code.

11.101.080 Application Requirements and Criteria for Approval

The applicant for registration shall agree to and meet the requirements of RCW 64.37.

11.101.090 Violations – Penalties

Penalties for violations shall be consistent with RCW 64.37.030(3)

Chelan County Vacation (Short-Term) Rentals
Proposed Code Conditions
27 January 2020

The following conditions are to be included in the Chelan County Code for Vacation (Short-term) Rentals in unincorporated areas of the county. These conditions are to be used as a supplement to the Washington State Statute on vacation rentals (RCW 64.37), which are to be adopted by reference. The draft code provided by Dan Beardslee should be used as the foundation to build upon. These conditions are to be added to Dan's draft.

Vacation rentals must meet all applicable local and state regulations, including business licenses and taxes such as Washington State sales, lodging and business and occupation taxes. In addition, Chelan County shall institute a Vacation Rental license, described below.

Vacation rentals must be operated out of a person's primary residence only. Accessory dwelling units, recreational vehicles, tents and other secondary housing units cannot be operated as Vacation Rentals.

The Chelan-Douglas Health Department and Chelan County Fire Marshall must inspect the vacation rental to secure a license from Chelan County. The first-year license cost must cover HD and FM time, plus licensing processing and code compliance. Thereafter, the annual license fee will cover only the cost of code compliance each year.

The Chelan County Vacation Rental Code will reference the existing codes for trash, trespassing, noise, and outdoor burning. Trash and recycling cans on the right-of-way are to be set out and removed within twenty-four hours of pickup.

The number of cars allowed at the vacation rental will be limited to the number of sleeping units (bedrooms) plus one.

Advertised lodging will have no more than two overnight guests per bedroom plus additional three overnight guests at any one time. The number of bedrooms is determined by the approved building permit for the structure. A guest is a person over six years of age.

All vacation rental license holders are required to display the address of the residence so that it is clearly visible from the street or access road. The house must have a sign or other identifier on outside as vacation rental. The sign must be made of natural materials not exceeding two square feet in area and if illuminated, shall be indirectly illuminated.

All owners of property used for vacation rentals shall comply with the following operational requirements:

1. The vacation rental shall not operate or be advertised without a Chelan County Vacation Rental License. Evidence of operation includes advertising, online calendars showing availability, guest testimony, online reviews, rental agreements or receipts.
2. Vacation rentals must maintain an up-to-date property management plan on file with the Chelan County Community Development Department and property owners within 300 feet of the building within which the vacation rental is located. The property management plan must include the following:

- a) Rules of conduct approved by the County;
 - b) Unified business identifier number, and the names and addresses of the property owner and agents authorized to act on the property owner's behalf;
 - c) A designated local property representative who lives within 30 minutes of where the Vacation Rental is located and will respond to complaints and emergencies within that time frame; and
 - d) A valid telephone number where the local property representative can be reached 24 hours per day, every day;
3. Prominently display in the rental the rules of conduct and a map clearly depicting the property boundaries of the vacation rental, and the escape route in case of an emergency. The map shall indicate if there is an easement that provides access to the shoreline; if so, the boundaries of the easement shall be clearly defined. If there is no access, this shall be indicated together with a warning not to trespass;
 4. Include the Chelan County license number for the Vacation Rental in all advertisements (AirBnB, Craigslist, poster, etc.) and marketing materials such as brochures and websites;
 5. Vacation rental owners must annually certify compliance with the conditions of license approval and with the fire and life safety requirements of the International Fire Code (IFC—or cite county code) as identified by the Fire Marshall and Community Development Department on forms specified by the department director. The annual certification shall be prominently posted on site; and
 6. Certify compliance with the conditions of license approval within 90 days after the closing date of the sale of the property. Written certification must be submitted to the Community Development Department on forms specified by the department director.

The Chelan County License is revoked for one year after three complaints are filed against a particular vacation rental. Complaints will be to the Sheriff, Community Development Department, or Commissioner. The first verified violation of this code section will result in a written notice. The second verified violation of this code section will result in a fine in the amount of \$500. The third verified violation of this code section will result in a one year suspension of the County permit.

A Vacation Rental Permit is not automatically transferable as part of the sale of property. A permit application from the new property owner must be approved to continue as a vacation rental.

The annual number of new vacation rental licenses issued will be capped to 1% of the total number of licensed vacation rentals as of January 1 of each year. Once the maximum number of vacation rental licenses has been reached, no additional licenses will be issued for that year. These licenses will be issued on a first-come, first-serve basis.

From: Bob Bugert
Sent: Monday, February 24, 2020 2:59 PM
To: Steve Jangaard <sejd@me.com>
Cc: Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>
Subject: Re: Short-term rentals. comments to Feb. 14 Plain public meeting.

Steve,
Thanks for your thoughtful email, and apologies for the late response.

We will include your comments on short-term rentals and, if you wish, will include your name as a party of record, which places you on our distribution list on this issue.

As I mentioned at the meeting in Plain, our goal is to have the ordinance completed by July. Do not be hesitant in holding us to this commitment.

Best regards,
Bob

Sent from my iPhone

On Feb 23, 2020, at 11:44 AM, Steve Jangaard <sejd@me.com> wrote:

Bob Bugert,

Thank you for meeting with us Plain folk again.

Of special interest to me and my family are the proposed Chelan County Short-term Rental codes.

I built a cabin on property I own for many years on the River Road in 2000. We use it a lot throughout the entire year and are seriously thinking about calling it home in the future.

Over the years we feel we have become part of the Plain community and love it. That sense of community is extremely important to me, my family and my neighborhood and should be preserved.

I am outlining a few concerns I have concerning short-term rentals (STR's) which I fear are a threat to the character of our community.

- The in flux of short-term rentals (STR's) in our immediate neighborhood is dampening the growth of our neighborhood spirit.
- Homes and cabins are being bought out by people, groups of people and LLC's and turned into STR's strictly with profit in mind.
- Many of the renters do not seem to be concerned for road safety. Increased traffic, ATV (motorcycles, snowmobiles, UTV's, etc) abuses are on the rise. On many occasions persons of all

ages can be observed speeding and playing recklessly on River Road without helmets (children included) and under the influence.

- Lack of respect of private property and people in general seems to be a common M.O. of the renters.
- STR's displacement of long-term rentals is a real issue. Long-term rentals should be encouraged.
- Some of the properties are not safe or designed for rentals. One across the street from me has had multiple visits by the fire department for smoke caused by overloaded heating circuits.
- Increased demands on the Sheriffs Department could also be an issue.

One of my biggest concerns right now is the fact that when people get wind of these proposed regulations there will be a flood of applicants trying to get on board before the 1% cap is imposed. Therefore, time is of the essence in getting something implemented even if its a bare bones regulation to begin with.

we need some regulations that can't be legally challenged but yet carries teeth ASAP.

Sincerely,

Steve Jangaard
16025 River Rd
Leavenworth WA 98826

SeJd@me.com

10 Attachment E: Host Compliance Information

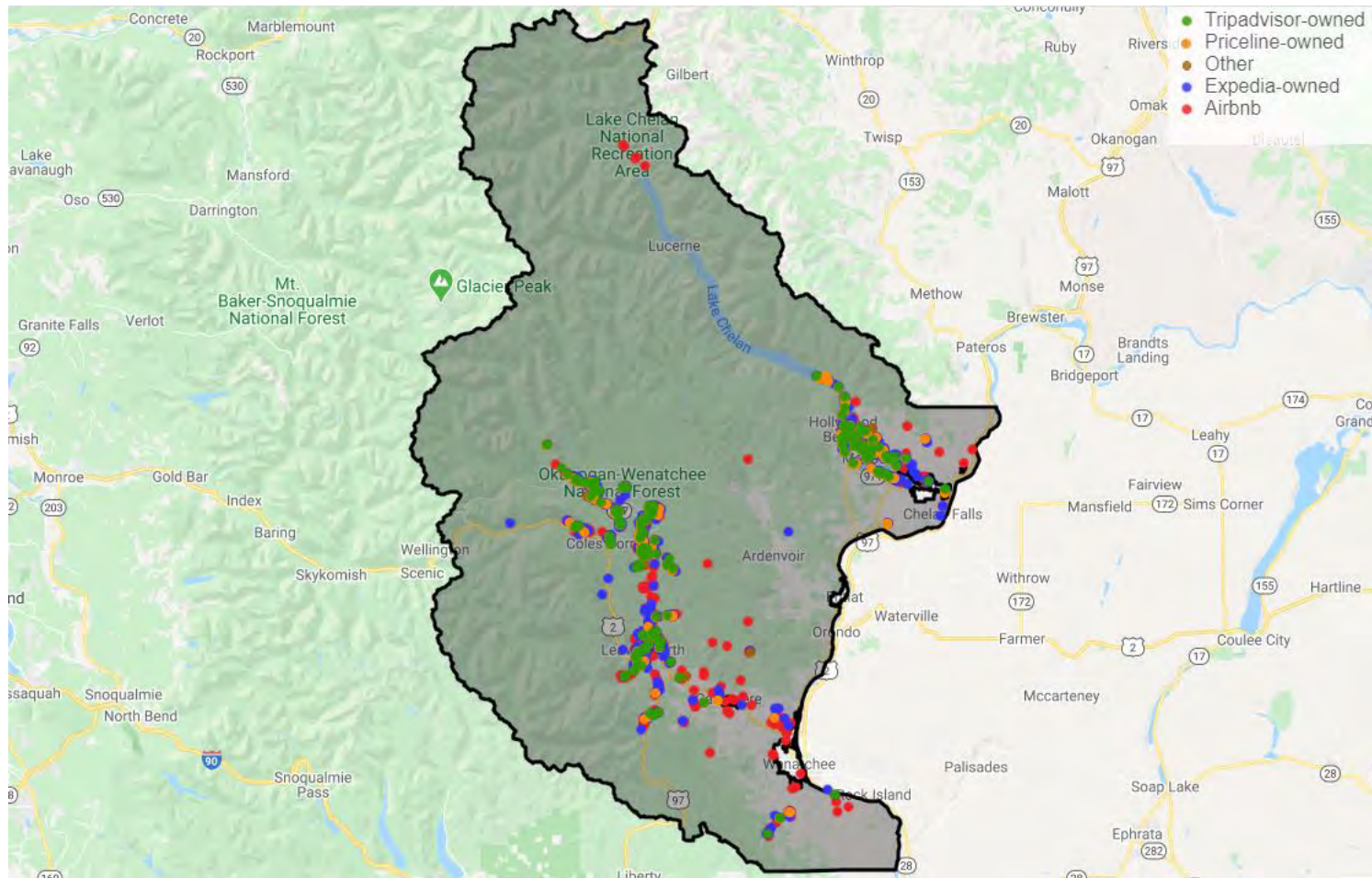


Cost-effective solutions to Chelan County's short-term rental registration, compliance monitoring, fraud, audit and enforcement challenges

March, 2020

...and in the unincorporated areas of Chelan County including the UGA excluding city limits we have identified 2,376 listings, representing 1,535 unique rental units*

Short-term rentals as of March, 2020

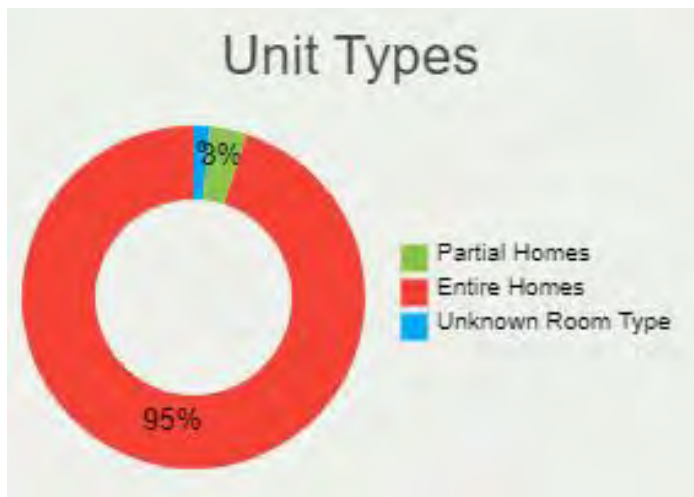


Chelan County's short-term rental listings are spread across a number of online platforms

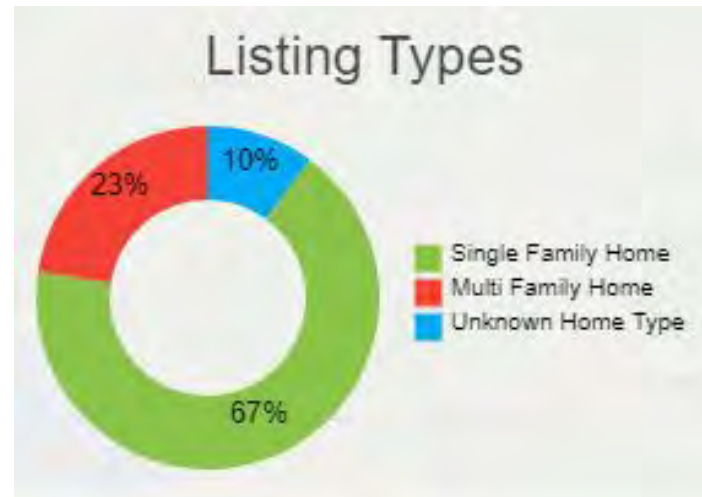
Median Nightly Rate
(USD)

\$216

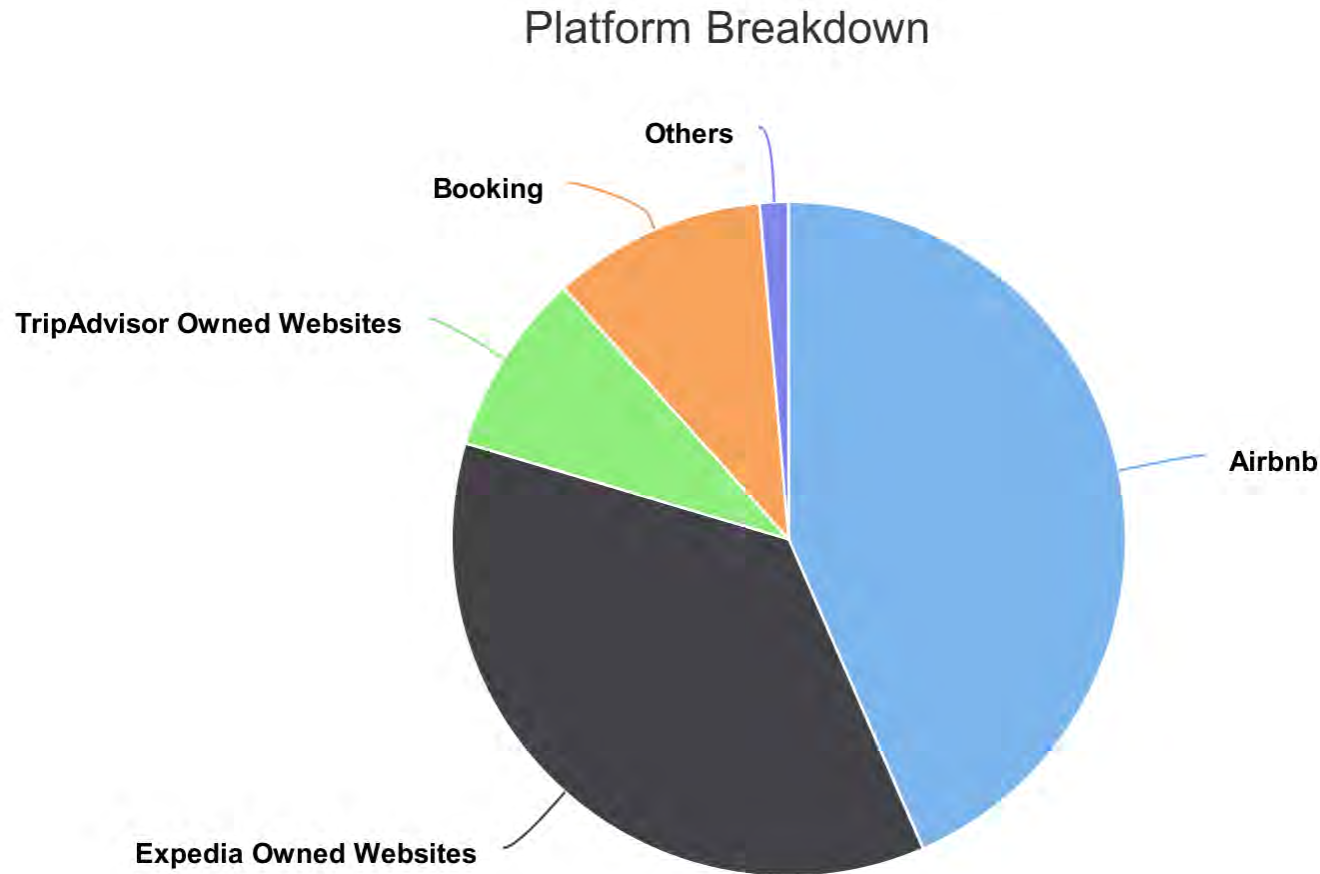
Unit Types



Listing Types



Chelan County's short-term rental listings are spread across a number of online platforms



Host Compliance's can help accelerate progress irrespective of where Chelan County is in the process of adopting and implementing effective short-term rental regulations

Pre-Ordinance

- ✓ Detailed local market data
- ✓ Online Ordinance Assistant tool
- ✓ Free webinars
- ✓ Guide To Effectively Regulating Short-term Rentals On The Local Government Level
- ✓ APA Short Term Rental Online Course
- ✓ Peer Introductions
- ✓ Free draft review
- ✓ Consulting and facilitation

Post-Ordinance

- ✓ Mobile-Enabled Online Permitting/Registration
- ✓ Address Identification
- ✓ Compliance Monitoring
- ✓ Rental Activity Monitoring
- ✓ Tax Collection
- ✓ Tax Audit Automation
- ✓ 24/7 Hotline

Host Compliance's software and services can address all Chelan County's short-term rental related challenges



Mobile-Enabled Registration and Tax Collection: Mobile/web forms and back-end systems for streamlining registration and tax collection processes and capturing required documentation, signatures and payments electronically



Address Identification: Automated monitoring of 50+ STR websites and online dashboard with complete address information and screenshots of all identifiable STRs in Chelan County's jurisdiction



Compliance Monitoring: Ongoing monitoring of STRs for zoning and permit compliance coupled with systematic outreach to illegal short-term rental operators (using Chelan County's form letters)



Rental Activity Monitoring and Tax Calculation Support: Ongoing monitoring of Chelan County's STR listings for signs of rental activity. Enables data-informed tax compliance monitoring and other enforcement practices that require knowledge of STR activity level



Dedicated Hotline: 24/7 staffed telephone hotline and online platform for neighbors to report non-emergency STR problems, submit evidence and initiative automatic follow-up activities



To accommodate any budget and ensure a high ROI for our clients, our services are priced based on the number of STRs that needs to be monitored

Cost per STR Listing/Rental Unit



**Mobile-Enabled Registration/
Tax Collection**

\$8.00 / yr



Address Identification

\$22.50 /yr



Compliance Monitoring

\$11.25 /yr



Rental Activity Monitoring

\$15.00 /yr



24/7 Dedicated Hotline

\$9.00 /yr

Note: The exact scope of work can be adjusted to meet Chelan County's exact monitoring needs in terms of geography, listing sites, listing types and other variables

Affordable modular pricing tailored to Chelan County's needs



**Mobile-Enabled Registration/
Tax Collection**

\$12,280 /yr



Address Identification

\$70,695 /yr



Compliance Monitoring

\$17,269 /yr



Rental Activity Monitoring

\$23,025 /yr



24/7 Dedicated Hotline

\$13,815 /yr

Note: Above pricing assumes 3,142 short-term rental listings and based in USD. Host Compliance would be happy to discuss alternative SOWs, contract terms, contract durations and pricing structures if that would be of interest.

Benefits to using Host Compliance's services

- ✓ Ensures fair, continuous and consistent compliance monitoring and enforcement
- ✓ Frees up valuable staff time that can be focused on higher-value added activities
- ✓ Minimizes noise, parking and trash violations
- ✓ Minimizes the impact on local law and code enforcement agencies as complaints are first handled by our 24/7 hotline and routed to the appropriate property owner before further enforcement actions are triggered
- ✓ Maximizes Chelan County's tax and permit fee collections
- ✓ REVENUE POSITIVE – in most cases, the additional registration fees alone pays for Host Compliance's services several times over
- ✓ Requires NO up-front investment or complicated IT integration
-> we can be up and running in 4 weeks!
- ✓ **6 MONTH UNCONDITIONAL MONEY BACK GUARANTEE!**

Contact info

Please feel free to contact us anytime if you have any questions about short-term rental regulation and how to best address the associated monitoring and enforcement challenges.

Kyle Salonga

kyle@hostcompliance.com

(415) 874-1783

Paul Hetherington

paulh@hostcompliance.com

(604) 763-7285

www.hostcompliance.com