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To: CD STRComment
Cc: Cherie" Warren
Subject: Comments on proposed STR code development
Date: Friday, September 4, 2020 5:47:56 PM

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Thank you for the opportunity to comment on Chelan County's efforts to develop code to regulate short-term rentals.

General Comments

<!--[if !supportLists]-->1. <!--[endif]-->Please create a "purpose and need" statement that clearly articulates what the proposed code is meant to accomplish in the context of the County's Comprehensive Plan. What specific opportunities provided by STRs does the County want to expand? What problems or negative externalities does the County want to solve or remedy? Develop a companion set of guiding principles the County will use to inform the hundreds of small decisions required to develop a coherent regulatory code in service of meeting the purpose and need. Be as spatially explicit as possible in the purpose and need statement and guiding principles. To be useful tools during code development, the purpose and need statement and guiding principles need to be specific about the varied microgeographic contexts regarding STRs that currently exist across Chelan County. The Vision statement currently provided in materials from Berk Consulting is too vague to guide decision-making. Highlight the purpose and need statement and guiding principles in all outreach activities throughout the code development process, use them as touchstones, and modify them judiciously as required by new learning and information.

Specific Comments (largely in support of comments provided by RUN)

<!--[if !supportLists]-->1. <!--[endif]-->STR Task Force activities. Following-up on conversations during BOCC Zoom meetings on this topic, please consider convening the Task Force to review effects of regulations and determine refinements or clarifications no later than 12 months after regulations have been enacted. Background research and effectiveness monitoring of regulations from other jurisdictions is limited. The regulations the County adopts will undoubtedly have flaws. Chelan County needs to be timely and responsive in terms of reviewing the effects of their first attempt at regulation and making needed adjustments.

<!--[if !supportLists]-->2. <!--[endif]-->Tier 2 and Tier 3 STRs (the absentee owner rentals) are not compatible in residential zones especially on small lots (i.e., RR 5 and smaller). Please protect neighborhoods from commercial operations that are incompatible in a residential setting.

a. <!--[endif]-->Be spatially explicit about the particular neighborhoods where the number or density of STRs needs to be reduced and where further expansion of STRs will be allowed or encouraged. Consider developing redistributive mechanisms tied to customized polygons derived from the best available information about the current distribution of STRs relative to housing stock. Use best available information from other jurisdictions and academic research to establish limits on the number, density, and spatial clustering of STRs that are consistent with goals and policies in the Comprehensive Plan.
b. <!--[endif]-->Consider distinguishing between "mom and pop" and commercial operators (multi-unit hosts) within the proposed three-tier framework. Structure regulations to give more lenient treatment to true "mom-and-pop" hosts (Wegmann and Jiao 2017). This category could be defined as hosts who are present in their housing unit

during the guests' stay (i.e., true "home sharing"), and also possibly include those who only rent their entire dwelling to guests for up to a certain number of total nights within a certain time period (for example, up to 30 nights within a given calendar year). This could steer the vacation rental market away from direct competition with the formal hospitality sector, and towards the provision of a genuine "home sharing" experience, including extended stays in a neighborhood setting, unavailable in conventional hotels and motels (Wegmann and Jiao 2017).

<!--[if !supportLists]-->3. <!--[endif]-->Phase out (sunset) non-conforming STRs within 2 years. Addressing the STR-related problems in our neighborhoods and our crisis in affordable housing cannot wait 5 years.

4. <!--[endif]-->Limit occupancy in Tier 1 and Tier 2 STRs to 2 people per bedroom or a maximum of 10 people, whichever is less. The number of bedrooms can be no greater than described on the approved septic and building permits.

Reference Cited:

Wegmann, J., & Jiao, J. (2017). Taming Airbnb: Toward guiding principles for local regulation of urban vacation rentals based on empirical results from five US cities. Land use Policy, 69, 494–501.

Thank you for considering my comments.
Sincerely,
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