



## Chelan County Planning Commission

Chair: Jordan McDevitt

Vice Chair: Vicki Malloy

Commissioners District 1: Vicki Malloy, Aaron Young, Jim Blair

Commissioners District 2: Jim Newberry, Randy Baldwin, Jordan McDevitt

Commissioners District 3: Carl Blum, Pat Hammersmith, Greg Becker

## Meeting Agenda

Wednesday, September 25, 2019 at 7:00 P.M. to 9:00 P.M.

Confluence Technology Center

285 Technology Center Way, Wenatchee, WA

### I. Call Meeting to Order

### II. Administrative

A. Review/Approval of Minutes from July 24, 2019 and August 28, 2019

### III. Public Comment Period

Comment for any matters not identified on the agenda (limit 2 minutes per person)

### IV. Old Business

A. Continued hearing for ZTA 19-004 Short-term rental code and definitions

### V. New Business

A. Workshop for Housing Code Update

- Current projects page for the housing update:  
<https://www.wenatcheewa.gov/government/community-and-economic-development/current-projects>
- Current draft from the same site:  
<https://www.wenatcheewa.gov/home/showdocument?id=22026>

B. Workshop for Comprehensive Plan Update: CPA 2019-001, -002, and -003

### VI. Discussion, at the Chair's discretion

### VII. Adjournment

Materials available on the Community Development website

*Chelan County Community Development*

316 Washington Street Suite 301, Wenatchee, WA 98801 ♦ Phone: (509) 667-6586 Fax: (509) 667-6475

**Next Meeting:** October 23, 2019 at 6:00 P.M.

All Planning Commission meetings and hearings are open to the public.



# CHELAN COUNTY PLANNING COMMISSION MINUTES

Chelan County Special Meeting  
Confluence Technology Center  
285 Technology Center Way  
Wenatchee, WA 98801

Date: July 24, 2019  
Called to Order: 7:00 PM

## **CALL TO ORDER**

Meeting was called to order at 7:05 pm.

## **COMMISSIONER PRESENT/ABSENT**

Greg Becker	Present	Jim Newberry	Absent
Randy Baldwin	Present	Carl Blum	Present
Pat Hammersmith	Present	Vicki Malloy	Present
Aaron Young	Present	Ryan Kelso	Present
Jordan McDevitt	Present		

## **STAFF PRESENT**

Dave Kuhl, Community Development Director  
Kirsten Larsen, Planning Manager  
Emily Morgan, Planner  
David Spencer, Building Official  
Angel Hallman, Code Enforcement Manager  
Lynn Machado, Office Manager  
Bob Plum, Fire Marshall  
Wendy Lane, Permit Clerk  
Lisa Ogle, Permit Clerk

## **APPROVAL OF JUNE 26, 2019 MINUTES**

Upon motion and second by Commissioners Becker and Malloy, the Commission unanimously approve the minutes with no changes.

## **PUBLIC COMMENTS** (for any matters not identified on the agenda – limit 2 minutes per person)

No members of the public commented.

## **PUBLIC HEARING ITEMS** – *Comments will be limited to 2 minutes of speaking time per person.*

**Item #1**

**Case: Hearing for ZTA 18-436 Text Amendments to Chelan County Code Section 11.23.020(3)**

**Manson Downtown Commercial District**

**Staff: Kirsten Larsen, Planning Manager**

Emily Morgan presented the Text Amendment to the Commissioners. She made a recommendation to the board for approval of the Amendment.

Chairman Jordan McDevitt opened the public portion of the meeting. No members of the public were here to testify.

Chairman Jordan McDevitt closed the public portion of the meeting on this matter.

Commissioner Greg Becker had questions concerning public comment on the matter as well as the impact on neighboring properties. Planner Emily Morgan and Planning Manager Kirsten Larsen addressed his concerns.

Vice Chair Vicki Malloy stated that a letter was received from a member of the Manson community that was against the Text Amendment and then a letter from the Manson Community Council received in support of the measure. Planning Manager Kirsten Larsen explained the process on how a member of the public can bring forward a Text Amendment.

**MOTION:**

Upon motion and second by Commissioners Kelso and Baldwin, the Commission voted on the Text Amendment. Commissioners Kelso, Baldwin, and McDevitt were for and Commissioners Blum, Malloy, Hammersmith and Becker were against. ZTA 18-436 Text Amendment was declined.

**Item #2**

**Case: Hearing for ZTA 19-004 Short-term rental code and definitions**

**Staff: Kirsten Larsen, Planning Manager**

Name: Steve Stroud

Address: 10587 Fox Rd, Leavenworth

Provided Testimony - FOR

Name: Dan Eby

Address: 237 Timber Ridge Canyon, Leavenworth

Provided Testimony – AGAINST

Name: Kendell Newell

Address: 3860 Viewmont Drive, Wenatchee

Provided Testimony - AGAINST

Name: Summit Newell

Address: 3860 Viewmont Drive, Wenatchee

Provided Testimony - AGAINST



Name: Zelda Holgate  
Address: 18720 Fir Loop Rd, Leavenworth  
Provided Testimony - AGAINST

Name: Summit Newell  
Address: 3860 Viewmont Drive, Wenatchee  
Provided Testimony - AGAINST

Name: Larry Jungk  
Address: 80 Willow Point Rd, Manson  
Provided Testimony - FOR

Name: Marty Fallon  
Address: 12275 Village View, Leavenworth  
Provided Testimony - FOR

Name: Bob Fallon  
Address: 12275 Village View, Leavenworth  
Provided Testimony - FOR

Name: Katlyn Betinger  
Address: 7990 Icicle Rd, Leavenworth  
Provided Testimony - FOR

Name: Jan Haven  
Address: 6670 Forest Ridge Drive, Wenatchee  
Provided Testimony - FOR

Name: Doug Lewis  
Address: 16750 Brown Rd, Leavenworth  
Provided Testimony - FOR

Name: Kerril Skinnarland  
Address: 510 Dempsey Rd, Leavenworth  
Provided Testimony - FOR

Name: John Olsen  
Address: 234 Okanogan Ave, Chelan  
Provided Testimony - FOR

Name: Stan Morris  
Address: 219 SE Center St, Chelan  
Provided Testimony - FOR

Name: Sean Lynn  
Address: 217 Cascade St, Leavenworth  
Provided Testimony - AGAINST

Name: Heather Mondini  
Address: 3614 Hansee Lane, Leavenworth  
Provided Testimony - AGAINST

Name: Vladamir Steblina  
Address: 4025 Birch Mtn Rd, Wenatchee  
Provided Testimony - FOR

Name: Stan Winters  
Address: 8200 River View Rd, Peshastin  
Provided Testimony - FOR

Name: Mora Bohman  
Address: 7840 E Leavenworth Rd, Leavenworth  
Provided Testimony - FOR

Name: Brian Bohman  
Address: 7840 E Leavenworth Rd, Leavenworth  
Provided Testimony - FOR

Name: Chris Clark  
Address: 9821 Icicle Road, Leavenworth  
Provided Testimony - FOR

Name: Ken Longley  
Address: 15880 Cedar Brae Rd, Leavenworth  
Provided Testimony - FOR

Name: Tracy Franks  
Address: 22621 NE 76 Street, Redmond  
Provided Testimony - AGAINST

Name: Brian Shugrue  
Address: 10230 Suncrest Drive, Leavenworth  
Provided Testimony - FOR

Name: Michelle Green, Jeffers Danielson Law Firm  
Address: 2600 Chester Kimm Rd, Wenatchee  
Provided Testimony - AGAINST

Name: Pat Thirbly  
Address: 1210 Dempsey Rd, Leavenworth  
Provided Testimony - FOR

Name: Lauren Johnson  
Address: 7785 E Leavenworth Rd, Leavenworth  
Provided Testimony - FOR

Name: Alex Thomason  
Address: 110 Lakeshore Dr, Pateros  
Provided Testimony - AGAINST

**MOTION:**

Motion and second by Commissioner Kelso and Becker to continue item to next Planning Commission meeting on August 28, 2019. Motion passes.

**NON-HEARING ITEMS**

**OTHER ITEMS AT THE CHAIR'S DISCRESSION**

**ADJOURNMENT**

**MOTION:**

Upon motion and second by Commissioners Becker and Baldwin, the Commission unanimously agreed to adjourn the meeting at 9:00 PM.



# **CHELAN COUNTY PLANNING COMMISSION MINUTES**

Chelan County Special Meeting  
Confluence Technology Center  
285 Technology Center Way  
Wenatchee, WA 98801

Date: August 28, 2019  
Called to Order: 7:00 PM

## **CALL TO ORDER**

Meeting was called to order at 7:00 pm.

## **COMMISSIONER PRESENT/ABSENT**

Greg Becker	Present	Jim Newberry	Present
Randy Baldwin	Present	Carl Blum	Present
Pat Hammersmith	Present	Vicki Malloy	Present
Aaron Young	Present	Ryan Kelso	Present
Jordan McDevitt	Present		

## **STAFF PRESENT**

Dave Kuhl, Community Development Director  
David Spencer, Building Official  
Angel Hallman, Code Enforcement Manger  
Lynn Machado, Office Manager  
Wendy Lane, Permit Clerk  
Lisa Ogle, Permit Clerk  
Ana Cortes, Permit Clerk

## **APPROVAL OF JULY 24, 2019 MINUTES**

Jordan McDevitt deferred the approval of the July 24, 2019 meeting minutes until the September 25, 2019, meeting due to the fact that not all of the Commissioners had chance to review them.

## **PUBLIC COMMENTS (for any matters not identified on the agenda – limit 2 minutes per person)**

**PUBLIC HEARING ITEMS** – *Comments will be limited to 2 minutes of speaking time per person.*

**Item #1**

**Case: Hearing for ZTA 19-004 Short-term rental code and definitions**

**Staff: Kirsten Larsen, Planning Manager**

Name: Mary Pat Barker

Address: 611 Cedars Street, Leavenworth

Provided Testimony - Wanted to know if rules were being followed at the state and county level.

Name: Kevin Sullivan

Address: 9241 Lone Pine Orchards, Leavenworth

Provided Testimony - AGAINST

Name: Kathy Blum, speaking on behalf of the Manson Community Council

Address: 15 Helious Lane, Manson

Provided Testimony - FOR

Name: Carl Florea

Address: 204 West Street, Leavenworth

Provided Testimony - FOR

Name: Emily Miller

Address: 1831 Dorner Place, Wenatchee

Provided Testimony - AGAINST

Name: Dan Beardslee on behalf of Building Northwestern Washington

Address: 325 32<sup>nd</sup> Street NW, East Wenatchee

Provided Testimony - AGAINST

Name: Sean Seaman

Address: 10463 Titus Road, Leavenworth

Provided Testimony - FOR

Name: Barbara Knapp

Address: 1595 Lone Pine Orchards Rd, Leavenworth

Provided Testimony - AGAINST

Name: Nichole Wright

Address: Leavenworth

Provided Testimony - FOR

Name: Mike Stanford on behalf of Chiwawa Pines

Address: 2393 Kinnickinick Dr, Leavenworth

Provided Testimony - FOR

Name: Lori Vandenbrink

Address: 12690 Ranger Rd, Leavenworth

Provided Testimony - FOR

Name: Tracy Smith

Address: 305 Tumwater Drive, Leavenworth

Provided Testimony - FOR

Name: Greg Steber  
Address: 12512 Wilson Creek, Leavenworth  
Provided Testimony - FOR

Name: Lori Braunstein  
Address: 11033 North Road, Leavenworth  
Provided Testimony - AGAINST

Name: Tony Meier  
Address: 2111 Lake Shore Drive, Manson  
Provided Testimony - AGAINST

Name: Brian Huber  
Address: 7515 50<sup>th</sup> Pl NE, Marysville  
Provided Testimony - AGAINST

Name: Aaron Huber  
Address: 6105 128<sup>th</sup> Street SW, Mukilteo  
Provided Testimony - AGAINST

Name: Gary Planagan  
Address: 714 Cedar Rd, Leavenworth  
Provided Testimony - AGAINST

Name: Allen Glasenapp  
Address: 18819 Alpine Acres Rd, Plain  
Provided Testimony - AGAINST

Name: Tom Latta  
Address: 4603 S 376<sup>th</sup> Street, Auburn  
Provided Testimony - AGAINST

Name: Steve Keene  
Address: 8237 Riverview Rd, Peshastin  
Provided Testimony - FOR

Name: Rick Thirlbey  
Address: 1210 Dempsey Road, Leavenworth  
Provided Testimony - FOR

Name: Hernon Stefano  
Address: 8787 Icicle Rd, Leavenworth  
Provided Testimony - AGAINST

Name: Lori Powers  
Address: 12085 Stromberg Canyon Rd, Leavenworth  
Provided Testimony - AGAINST

Name: Shelly Bickel  
Address: 3929 Camas Creek Rd, Peshastin  
Provided Testimony - AGAINST

Name: Steve Stroud  
Address: 10587 Fox Road, Leavenworth  
Provided Testimony - FOR

Name: Nina Schultz  
Address: 365 Ridgeview Place, Wenatchee  
Provided Testimony - FOR

No additional members of the public wished to comment.

Dave Kuhl suggested closing the public comment portion of the meeting and continuing the Hearing to the September 25, 2019 Planning Commission Meeting.

Chairman Jordon McDevitt closed the public comment portion of the meeting.

**MOTION:**

Motion and second by Commissioners Young and Baldwin to continue item to next Planning Commission meeting on September 25, 2019.

**ADJOURNMENT**

**MOTION:**

Upon motion and second by Commissioners Becker and Kelso, the Commission unanimously agreed to adjourn the meeting at 8:15 PM.

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: Another example- Spring Street  
**Date:** Monday, August 19, 2019 7:55:36 AM  
**Attachments:** [ATT00001.htm](#)  
[Video.MOV](#)  
[ATT00002.htm](#)  
[image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Dave Kuhl  
**Sent:** Monday, August 19, 2019 7:24 AM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>  
**Cc:** Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>  
**Subject:** FW: Another example- Spring Street

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**From:** Bob Bugert <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>  
**Sent:** Sunday, August 18, 2019 3:37 PM  
**To:** Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>; Doug England <[Doug.England@CO.CHELAN.WA.US](mailto:Doug.England@CO.CHELAN.WA.US)>; Dave Kuhl <[Dave.Kuhl@CO.CHELAN.WA.US](mailto:Dave.Kuhl@CO.CHELAN.WA.US)>  
**Subject:** Fwd: Another example- Spring Street

For your information.  
Thanks  
Bob



Sent from my iPhone

Begin forwarded message:

**From:** "Robin John" <[robin@posthotelleavenworth.com](mailto:robin@posthotelleavenworth.com)>

**To:** "Bob Bugert" <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>

**Subject: Another example- Spring Street**

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

It's been another afternoon of having to keep our kids inside with music on (loud swearing and talking about very crude things that we could hear from 2 houses down). I just wanted to pass this on so you have information of what these rentals are like. Hopefully the sound on the video goes through!

Thank you and please let me know if there's anything I can do!

Sincerely,  
Robin John  
206-841-6904







**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Thursday, August 22, 2019 9:04:44 AM  
**Attachments:** [image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
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Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
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[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** jason trichler <jtrichler@yahoo.com>  
**Sent:** Wednesday, August 21, 2019 7:32 PM  
**To:** Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** Re: Continued Public Hearing - Vacation/Short Term Rentals

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

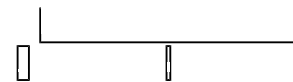
My 3 bedroom 3500 sq ft home would be limited to 6 guests? That doesn't even make sense? 8 was almost understandable almost but my house easily accommodates 10-12 people

I'm all for limiting these rentals that sleep 14 people and are like 1800 sq ft but removing the 2 additional guests clause is ridiculous

Sent from my iPhone

On Aug 21, 2019, at 1:00 PM, Chelan County Community Development <[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)> wrote:

***Wednesday, August 28th, 2019***  
***Chelan County Planning***  
***Commission***



The Chelan County Planning Commission, along with the Department of Community Development, invite you to a public hearing (continued from July 24, 2019) in regard to code development for the management of short term/vacation rentals.

***Location***

Confluence Technology Center  
285 Technology Center Way  
Wenatchee, WA 98801

***Time***

August 28th, 2019

7:00-9:00 PM

**Draft Code**

Click map above for specific  
directions to the Confluence  
Technology Center

**Agenda**



If you have questions, please contact the Department of Community  
Development @ 509-667-6225, or email [Lynn Machado](#).  
[Community Development Website](#)



Chelan County Community Development | 316 Washington Street, Suite 301, Wenatchee,  
WA 98801

[Unsubscribe jtrichler@yahoo.com](#)

[Update Profile](#) | [About Constant Contact](#)

Sent by [lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us) in collaboration with



[Try email marketing for free today!](#)

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: Short term rentals  
**Date:** Thursday, August 22, 2019 9:04:57 AM  
**Attachments:** [image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Steve Shumway <steveshum@aol.com>  
**Sent:** Wednesday, August 21, 2019 5:06 PM  
**To:** Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** Short term rentals

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

I was wondering we live in Manson and there's a lot of vacation rentals in our area. I was wondering if there could be a distance between vacation rentals in a high density neighborhood?

Sent from AOL Mobile Mail  
Get the new AOL app: [mail.mobile.aol.com](http://mail.mobile.aol.com)

**From:** [Kirsten Larsen](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: Short Term Rental Regulations  
**Date:** Monday, August 19, 2019 7:28:26 AM  
**Attachments:** [image001.png](#)

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**Kirsten Larsen, AICP**  
**Planning Manager**  
**Community Development Department**



316 Washington Street, Suite 301  
Wenatchee, WA 98807  
Phone: (509) 667-6225 | Fax: (509) 667-6475  
[Kirsten.Larsen@co.chelan.wa.us](mailto:Kirsten.Larsen@co.chelan.wa.us)

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

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**From:** Matthew Carlisle <carlislematthew@hotmail.com>  
**Sent:** Saturday, August 17, 2019 10:11 AM  
**To:** Dave Kuhl <Dave.Kuhl@CO.CHELAN.WA.US>; Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>  
**Subject:** Fw: Short Term Rental Regulations

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

Hello,

Please see below. I got an "undeliverable" response to this message which is confusing as it's the published email address.

I wasn't quite sure who to email so I hope I picked the right people. If not, please forward as appropriate.

Best regards,



-Matthew Carlisle

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**From:** Matthew Carlisle

**Sent:** Saturday, August 17, 2019 10:02 AM

**To:** [cdplanning@co.chelan.wa.us](mailto:cdplanning@co.chelan.wa.us) <[cdplanning@co.chelan.wa.us](mailto:cdplanning@co.chelan.wa.us)>

**Subject:** Short Term Rental Regulations

Hello,

I'm writing to express strong support for the introduction of short term rental regulations. I live in Plain and own property adjacent to three rentals operated by Vacasa and I write to you tired and frustrated after a sleepless night of noise until 2:30AM in the morning. You can imagine what it's like during Oktoberfest once the party transfers from Leavenworth back up to Plain.

While Vacasa has expressed support for my concerns, I do not currently have access to 24 hour support. In fact, I texted Kevin King who is the local Vacasa operations manager at 11PM last night asking what can be done. So far as of the following morning at 10AM I have no response. They are not required to respond, after all. There are no consequences and I'm possibly just an annoyance to them.

Problems I personally experience that significantly diminish my ability to enjoy living here:

**-Noise.** Mostly drunk partiers in the summer, screaming and shouting into the early morning hours. Though I'm probably 100 yards from the properties, sound travels well out here and in the summer I need my windows open at night.

**-Trespassing.** I have no fences between my property and the 3 rentals. Vacasa has put a note in for the renters, and we have installed ropes. It seems to be helping but time will tell. I once had people camping on my property. In winter time it's common to have people looking for a sledding hill.

**-Garbage.** Short term renters sometimes over fill the garbage bins (which are not secured against animals) and the property management company is not putting them out on Monday morning reliably. The net result is often garbage on the road and blowing onto my property. I once had used diapers on my driveway that I had to clean up.

The crux of the problem is that short term renters do not live here, so any problems they produce will just be left here for those that *do* live here. They are not all bad of course, but there are enough of them cycling through that the 10% that are not considerate significantly

impact me. This is not the same as long term renters who have an incentive to get along with the neighbors. There needs to be consequences to the operators and/or owners of these rentals so that they take the problem seriously. Right now their only real motivation is to try and keep the level of the problem down just enough to stop them being regulated and potentially getting fines.

In general I think the draft regulations are good and appreciate the work you're doing in this area. I have the following comments:

**-Noise.** The noise regulation seems wishy washy. How do I record and report noise at 2am, and who decides if it's acceptable or not? What about 9pm? 10pm? I recommend a stronger set of verbiage here. What about "quiet hours"?

**-Bedrooms.** The formula for number of bedrooms is easily manipulated. If the owner just has to provide a floor plan showing sleeping arrangements then they can just provide bunks, sofa beds. There are seemingly no limits. I recommend that the number of bedrooms be determined by the lower of the number of bedrooms from an approved building permit, or the number of bedrooms supported by a health department approved septic installation (if applicable). There is a reason why the septic systems are approved for a specific number of bedrooms; I don't want my drinking water contaminated. It can't just be a building permit because mine back in 1992 had 3 bedrooms but there is actually only one real bedroom and that's what my septic is rated for.

**-24 hour support.** I'm in strong support of the provision for a 24 hour telephone number but I believe it should also a number that can be texted. Texting will allow for better documentation of concerns and response for review afterward. Do we need to clarify that the 30 minute response is applicable for every day in the year?

I am considering renting my place out for short term usage at some point in the future. I welcome the regulation because I have no interest in making the neighborhood a bad place to live for those that live here full time, as I currently do. Unfortunately, some people are not as neighborly and require regulation in order to enforce good behavior. We have laws for a reason.

Thank you for your time and consideration and I appreciate the work you're doing in this area. Would you mind emailing me back to let me know you got my comments? I'm hoping they can be added to the record for the next meeting as I can't make it in person.

-Matthew Carlisle  
16975 River Road,  
Leavenworth, WA 98826

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: STR - Leavenworth  
**Date:** Monday, August 19, 2019 8:26:25 AM  
**Attachments:** [image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Rebecca Hills <mamahills@frontier.com>  
**Sent:** Thursday, August 15, 2019 11:39 AM  
**To:** Bob Bugert <Bob.Bugert@CO.CHELAN.WA.US>; Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** STR - Leavenworth

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

The picture that didn't go through was of just some of the garbage after a stay. (Not tech savvy)  
Side note: I sure feel bad for the housekeeper.

Just a couple of points:

I've seen up to nine cars at one residence and the house is not large. (I have some pictures of the cars if needed.) I worked in the hotel business and I know there is a limit to the amount of people that can stay in a room or it is in violation of the fire code.

I'm not sure, but I suspect the pools located at two of the residences may not be up to code for

public use.

This is something that should not be my concern, but I wonder if the insurance they carry on the properties covers overnight rentals? Really, how could it if this area is not zoned for overnight rentals?

I'm sure my frustration is coming through and I apologize for that.

Thank you again for your time.

Rebecca Hills  
509.670.4825

## Wendy Lane

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**From:** Kirsten Larsen  
**Sent:** Friday, August 23, 2019 11:45 AM  
**To:** Wendy Lane  
**Subject:** FW: For Submission into the Public Record

**Kirsten Larsen, AICP**  
**Planning Manager**  
**Community Development Department**



316 Washington Street, Suite 301  
Wenatchee, WA 98807  
Phone: (509) 667-6225 | Fax: (509) 667-6475  
[Kirsten.Larsen@co.chelan.wa.us](mailto:Kirsten.Larsen@co.chelan.wa.us)

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

[CLICK HERE TO TAKE THE SURVEY!](#)

**NOTICE OF PUBLIC DISCLOSURE:** This e-mail account is public domain. Any correspondence from or to this e-mail account may be a public record. Accordingly, this e-mail, in whole or in part, may be subject to disclosure pursuant to RCW 42.56, regardless of any claim of confidentiality or privilege asserted by an external party.

**From:** Camila Borges <[camilafletcher@gmail.com](mailto:camilafletcher@gmail.com)>  
**Sent:** Friday, August 23, 2019 11:37 AM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>; [+kevin.overbay@co.chelan.wa.us](mailto:+kevin.overbay@co.chelan.wa.us);  
[+bob.bugert@co.chelan.wa.us](mailto:+bob.bugert@co.chelan.wa.us); [+doug.england@co.chelan.wa.us](mailto:+doug.england@co.chelan.wa.us); [+carlye.baity@co.chelan.wa.us](mailto:+carlye.baity@co.chelan.wa.us)  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property Camila Fletcher of 1 short-term rental unit in Leavenworth for the past 4 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise

complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Camila

--

"Quem quer fazer alguma coisa, encontra um meio. Quem não quer fazer nada, encontra uma desculpa"

## Wendy Lane

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**From:** Kirsten Larsen  
**Sent:** Friday, August 23, 2019 11:45 AM  
**To:** Wendy Lane  
**Subject:** FW: For Submission into the Public Record

**Kirsten Larsen, AICP**  
**Planning Manager**  
**Community Development Department**



316 Washington Street, Suite 301  
Wenatchee, WA 98807  
Phone: (509) 667-6225 | Fax: (509) 667-6475  
[Kirsten.Larsen@co.chelan.wa.us](mailto:Kirsten.Larsen@co.chelan.wa.us)

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

[CLICK HERE TO TAKE THE SURVEY!](#)

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**From:** Camila Borges <[camilafletcher@gmail.com](mailto:camilafletcher@gmail.com)>

**Sent:** Friday, August 23, 2019 11:41 AM

**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>; Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>; Bob Bugert <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>; Doug England <[Doug.England@CO.CHELAN.WA.US](mailto:Doug.England@CO.CHELAN.WA.US)>; Carlye Baity <[Carlye.Baity@CO.CHELAN.WA.US](mailto:Carlye.Baity@CO.CHELAN.WA.US)>

**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental unit in Leavenworth for the past 4 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term

rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Camila

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"Quem quer fazer alguma coisa, encontra um meio. Quem não quer fazer nada, encontra uma desculpa"



## Kirsten Larsen

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**From:** jeff geers <jeffgeers@outlook.com>  
**Sent:** Friday, August 23, 2019 8:03 AM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental in Leavenworth for the past 4 years. I personally support the County's desire to regulate the nightly rental market, but I do feel we have been wrongly stigmatized by recent conversation that seems to paint nightly rentals as a bad development. Increasingly travelers love to vacation in groups or families and nightly rentals are the only viable option. I first bought my home in Leavenworth because it was just plain impossible to book a hotel unless you plan months in advance. I live here part time and plan to retire here.

I support safety inspections of my home, limits on how many renters can occupy a home (in part to limit parking issues) and I always pay my taxes. I support the idea that certain zoning restrictions (for example in UGAs) would not allow nightly rentals so that pockets of development would be more affordable and full time residents would have a better sense of community.

I think the noise nuisance policy targets nightly rentals in a discriminatory manner. There are plenty of homes with permanent owners or monthly renters that occasionally get a little too noisy, yet nightly rentals are being unfairly targeted. The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints. Although I have never had reason to complain about my neighbors who rent and no one has ever complained about my own renters, I worry that opponents of nightly rentals will unfairly use complaints to try to shut down neighboring nightly rentals out of spite.

Finally, as a Developer I think the new regulations will likely improve safety conditions and limit rental groups that are way too large and have too many cars. I'm skeptical that it will help with the affordability of housing. A huge number of nightly rentals are very nice properties that would be expensive regardless of their rental value. Most of the smaller rental homes and condos that could be affordable are not really affected by the new regulations. I think true progress on affordable housing comes down to zoning and proactive development.

**JEFF GEERS**  
BUILDER | DEVELOPER  
**2JG, LLC**  
206-920-2903

## Kirsten Larsen

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**From:** camilafletcher@gmail.com on behalf of Camila Borges <camilaborgesm8@gmail.com>  
**Sent:** Thursday, August 22, 2019 10:07 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us;  
+doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental units in Leavenworth for the past 4 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Camila Fletcher

New vacation  
rental code  
Comments

## Kirsten Larsen

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**From:** Melanie <melanie.riddick@gmail.com>  
**Sent:** Thursday, August 22, 2019 10:10 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us;  
+doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental units in Plain, WA for the past 2.5 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Melanie Riddick

## Kirsten Larsen

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**From:** Cody Harris <codycharris@gmail.com>  
**Sent:** Thursday, August 22, 2019 10:25 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental near Lake Wenatchee. We are concerned about the proposed code regulations and how it may impact the community of Plain, WA. The revenue produced by STRs in the area employee several contractors, from cleaners to handymen, and support the outdoor recreation and tourism industry for the area. If the restrictions on STRs increase, we will simply let our place sit vacant 300+ days a year, increasing fire risk due to reduced regular maintenance and killing several jobs in the area. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint whatsoever, including by our neighbors.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing \*existing" ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Cody Harris  
Cedar Brae Chalet

## Kirsten Larsen

---

**From:** Andrea Clark Watson <andrea.clark@vacasa.com>  
**Sent:** Thursday, August 22, 2019 10:32 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us;  
+doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property manager of 326 short-term rental units in Chelan and Leavenworth area for the past 3 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical for homeowners in paying for their living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten homeowners investment and our futures, not to mention the local economy.

We have been good stewards of our properties, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Andrea Clark

## Kirsten Larsen

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**From:** Matt Simonis <k9mat@hotmail.com>  
**Sent:** Thursday, August 22, 2019 10:39 AM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of one short-term rental unit in west county, west of Coles Corner, for the past year. We secured this property by converting my retirement into an LLC that officially owns the property. Our goal is to supplement our Social Security with the revenue from this property (and maybe more later).

We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses during our retirement. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

I have been in 38 states and 15 countries. Leavenworth is one of the coolest places on the planet! This is why we chose to buy there.

We have been good stewards of our property, and caring for the surrounding community in good faith. Our neighbors are amazing. We are in the process of building a cabin and look forward to continue being an excellent neighbor, spending as much time as possible there when rentals are not booked.

We have a serious concern in this matter: The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of over 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Matt and Dewan Simonis  
Managers, Psymuhnys LLC

If you would like to discuss this further, please do not hesitate to contact me at the number below.

Matt Simonis, MBA, CMBA, C.P.M., CQT, CQI  
+1 360 929 7100

## Kirsten Larsen

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**From:** Snowgrass Lodge <snowgrasslodge@gmail.com>  
**Sent:** Thursday, August 22, 2019 11:29 AM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of 2 short-term rental units just outside Leavenworth for the past 2 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Hernan Savastano

## Kirsten Larsen

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**From:** dunegrass <dunegrass@gmail.com>  
**Sent:** Thursday, August 22, 2019 11:32 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner and manager of one short-term rental unit in Chelan County (Lake Wenatchee area) for the past year. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. There has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing the Sheriff's department staff to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Kim Kertson



## Kirsten Larsen

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**From:** Brook L. Nunn <brookh@uw.edu>  
**Sent:** Thursday, August 22, 2019 12:24 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental units in Plain WA for the past year. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Brook Leanne Nunn

## Kirsten Larsen

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**From:** Gloc Haus <gloc\_haus@outlook.com>  
**Sent:** Thursday, August 22, 2019 1:01 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

My name is Joe Glockner, I am a property owner of a short-term rental property in Chelan County. My wife and I are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We focus on earning excellent reviews from our guests and receive consistent 5-star reviews. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only TWO verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,

Joe Glockner

## Kirsten Larsen

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**From:** Kimberly McRoberts <kamcroberts02@gmail.com>  
**Sent:** Thursday, August 22, 2019 1:05 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental unit in Leavenworth for the past year. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. I relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to remodel my property. The new regulations would threaten my investment and future, not to mention the local economy.

I have been a good steward of my property, and caring for the surrounding community in good faith. I do my best to be respectful of neighbors and are on call to respond quickly to any nuisance created by our guests. As far as I'm aware, there has never been an incident at my rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Kimberly McRoberts

Check out Acorn Studio on Airbnb for your next visit to Leavenworth! 😊 🏠 <https://abnb.me/jFZSOiAYTW>

## Kirsten Larsen

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**From:** Angela Sucich <asucich@hotmail.com>  
**Sent:** Thursday, August 22, 2019 1:26 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

My husband and I are property owners of a short-term rental in Leavenworth, which we purchased two years ago as part of our dream of moving to the area and supporting ourselves while contributing to the community and local economy. We are deeply concerned about the proposed code regulations and how they will impact us. The revenue we receive from our rental is critical to paying for our living expenses and our retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property two years ago. The new regulations would threaten our investment and our futures, and we understand it would also negatively impact the local economy by driving out many STR-related businesses and affecting the tourism market in the process.

We have been good stewards of our property, and we do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Angela Sucich

## Kirsten Larsen

---

**From:** Allegra Andersen <allegraand@gmail.com>  
**Sent:** Thursday, August 22, 2019 1:55 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a joint property owner of 1 short-term rental unit in Leavenworth for the past 13 years. I am deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,

Allegra Andersen  
206-551-0461

## Kirsten Larsen

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**From:** Don Eikenberry <doneikenberry@hotmail.com>  
**Sent:** Thursday, August 22, 2019 2:12 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity; Don Eikenberry  
**Subject:** For Submission into the Public Record

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

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I own a vacation rental on the Leavenworth golf course which is outside the UGA and city limits. I also have a vacation rental in Kona and one in Chelan at the Grandview. I live in Chelan and was born and raised in Wenatchee.

I wanted to weigh in on the proposed short term vacation rental regulations you are considering at this time. I'm not much of a "official meetings" guy so appreciate the chance to say my piece from a computer and have it in the record.

Even though I'm a vacation rental owner, I'm not entirely opposed to some of the proposed rules and I'm sympathetic to residential home owners concerns.

11.93.380 (8) (B) I'm in favor of noise ordinances but they should be enforced in a fair manner to rule out an unhappy home owner from targeting a legal rental property they take unfair issue with. The noise ordinances are already there and I'd welcome fair enforcement of those rules. It would be nice if home owners could work with the vacation rental manager to solve the problem before calling law enforcement but I'm not sure how you could mandate that. Perhaps the county or vacation rental industry could hire a noise compliance officer to respond to complaints before law enforcement is involved. There should be some sort of intermediary between homeowner noise complaint and the sheriff.

11.93.380 (9) (A)(iii) I'm in favor of clarifying the 30 minute rule for the property representative. I think being "contactable" within 30 minutes of an issue is fine but being "on site" within 30 minutes of notification is unreasonable. You can't even get to Leavenworth from Wenatchee within 30 minutes, much less Chelan. In Hawaii, the responsible person has three hours to be "on site" in case of a call. I think a couple hours would be fair for someone to be on site after first responding with a phone call within 30 minutes.

11.93.380 (2) I'm in favor of expanding the two adults per bedroom and kids under 6 don't count as it's overly restrictive. Most vacation rentals have a sofa bed in the living room that sleeps two so I'd rather the rule be two per bedroom, plus two (sofa bed). Also, raising the age limit of kids who "don't count" should be raised to 12. This would encourage more family type use of vacation rental homes.

11.93.380 (1) I'm in favor of the one vacation rental per lot rule as it cuts down on congestion in residential areas.

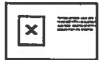
11.93.380 (7) This rule should be clarified/changed to allow for a rentals property manager to have a business license in lieu of the owner. For example, my property manager is a host on Airbnb. Airbnb directly pays hotel/lodging/sales taxes required of the city and county. The property manager "operates" the vacation rental and will have a business license. Some owners prefer to have a passive relationship with respect to their rentals and employ a property manager. There is no reason for both the property manager AND the owner to have a business license. It's an unnecessary burden to the owner and creates a potential tax complications.

Thank you for the opportunity to weigh in on these issues for the record.

Feel free to contact me at:

Don Eikenberry  
PO Box 947  
Chelan, WA 98816  
(509) 288-0637  
doneikenberry@hotmail.com

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## Kirsten Larsen

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**From:** Whitney Curry <whitneycurry@gmail.com>  
**Sent:** Thursday, August 22, 2019 2:13 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Cc:** Sean Lynn; Will Curry; Elaina Bruce  
**Subject:** Keep short term rentals! - Email For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm am a **highly concerned property owner of one short-term rental unit in Plain for the past 3 years**. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Whitney & Will Curry



## Kirsten Larsen

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**From:** David Patterson <davepatt1955@gmail.com>  
**Sent:** Thursday, August 22, 2019 2:38 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I have been a property owner, along with my sons, of one short-term rental units on Fish Lake for the past three years. I am deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue I receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,

David Patterson

**From:** [deborah noble](#)  
**To:** [Wendy Lane](#)  
**Date:** Tuesday, August 27, 2019 3:39:19 PM

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

How stupid is this! Once again, hurt Chelan County. People from out of state come in and spend vacation money that help small business merchants and build relationships in our community giving the middle class jobs. As usual bureaucracy interferers. Always has to find an additional way to tax the middle class or shut them down. Go support hotels in the community no one can afford. Leave oout hard working families or young adults. How stupid is this!!!! No, i will not attend this meeting or support anyone who has encouraged this meeting.

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**From:** [Michael Thresher](#)  
**To:** [Wendy Lane](#)  
**Subject:** Short term rentals  
**Date:** Tuesday, August 27, 2019 3:37:53 PM

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

Dear Chelan County Commissioners,

Short term renting is a viable home business that many of us need to make ends meet. Promoting entrepreneurship is key to our county's health and like all home based entrepreneurs in our county, we should have your support, not your opposition. Please say "NO" to special interests who want to limit other people's property rights for their own benefit.

Thank you for protecting our property rights,  
Michael Thresher  
Cashmere WA  
509-741-7060

337  
My name is Daniel Eby, at Timber Ridge Canyon in Leavenworth, I own Destination Leavenworth, and am President of a regional association of professional managers *and legal committee chair of STRACC*

This association was formed in 2010 as a result of a pledge we made to the County commissioners, Keith Goehnor, Buell Hawkins and Ron Walters in a Public Hearing that we would self-govern our industry and we would form an association to help us achieve this goal. In response, the commissioners voted to not regulate then and twice additionally over the years.

**We have kept our pledge and today we have what we believe to be, the lowest record of complaints for short-term rentals in the nation.**

Our recent proposal to the Commissioners offered a New Approach to show how the current codes, applied to every residential property, along with actual enforcement when issues arise is the right solution, These codes will work well, if we simply enforce them.

The Short-Term Rental Alliance of Chelan County is not against COMMON SENSE codes that are applied to all properties equally. We are against codes that discriminate against a select group of property owners because it is the right of a property owner to rent their own property.

Despite our proposal and individual meetings with each of the County commissioners, they have ignored our recommendations and have:

- Passed the 2019 budget with a line item for new permit fees for STR's in order to raise \$750,000 to make up for a budget deficit from a poorly run CCCD. This new revenue extraction from property owners would make up 24% of the new CCCD budget for 2019.  
**Passing this current budget, while telling us they are only considering new codes and have not made a decision, is both hypocritical and not transparent.**
- Told the CCCD to begin development of code against a select group of property owners, who then wrote up 14 pages of draft code that will severely impact the economy of this County, lower tax revenue, lower property values and discourage tourism.

**Yet the real problem remains: CCCD does NOT enforce the current code when issues occur.**

Enforcing existing code—is the only REAL solution for the relatively few instances when incidents actually do happen. AS Sheriff Burnett has testified—there is really not a problem.

Confront the person causing the disturbance, and if need be, fine him on the spot, but don't punish the Owner of the property.

**STRACC** is not saying NO REGULATION...we are saying we have **ENOUGH REGULATION**

**Just USE IT—IT WILL WORK!**

Discriminating against property owners unfairly, divides communities and forces neighbors to report on each other **instead of** encouraging friendliness and cooperation.

Now groups against STR's are stirring up opposition to tourism, with their slogan:

**Neighbors Not Strangers**

Does our county want to be known for telling families from other places: **Don't Come Here**—when the trend is clear that families across the nations want to stay in homes when they travel?

Even some of the County Commissioners admit that they stay in vacation rentals. Could they imagine hearing, **"You Are Not Welcome Here, as** there is little availability in our town, because our local government has strangled property owners with oppressive regulation which caused an exodus as owners sold their homes in a down market."

**Yet, that is the effect of these proposed Draft Codes.**

Our nation was founded on the principle of "limited government"- protecting life, liberty and the pursuit of happiness—which is the protection of property rights.

**This Draft code is NOT what the founders described as LIMITED GOVERNMENT.**

We all tired of the oppressive nature of state and federal bureaucracy. It seems impossible to stop what's happening in Washington DC or Olympia, but here in Chelan County we can and must make a stand against a local government that is run amok with ideas to extract money and pass codes that ruin individuals and families who are just trying to make a living.

Accountability must begin here in Chelan County.

For over 35 years, Chelan County has been a great, safe place to invest in a home for the future. WE oppose new codes that will ruin the dreams of those who have bought property as a way of helping to pay for their retirement or pay their bills.

These individuals were counting on Chelan County where they could find a local government that would be business and tourist friendly, a County that would see the benefits that limited government gives to those seeking to visit, invest or stay.

You, the Planning Commission, a volunteer board of Chelan County citizens and business people have an opportunity, YOUR VOICE COUNTS.

- VOTE NO to this extraction and regulatory nightmare within this Draft Code.
- Tell the Commissioners we already have existing codes in place that addresses every possible violation, and for every type of resident.
- Tell them we have an industry willing to self-regulate and call out any property owners who are not following the current rules.

But most of all, we ask you this Commission to:

- INTERPOSE yourself between the County and the hundreds and hundreds of property owners and protect these owners from the County's attempt to take away their right to rent and the years of hard work they have invested here.
- Please VOTE NO to the Proposed Draft Code against STR's and protect those dreams of families **who just like you are trying to prepare for their future.**

Thank you

Hi, my name is Summit Newell and my family build a vacation rental in 2014. My mom and dad told the county exactly what they were going to build - a large vacation rental for big family reunions, church groups and business retreats. The county planners and commissioners all said the same thing, "we do not regulate vacation rentals". With the blessing of the county we got a loan and built The Leavenworth Lodge, next to pear orchards, Smallwood's Harvest and Silvara Winery.

According to my Uncle Keith, who was the former commissioner, we have had one complaint in the 5 years we have been in business. I guess a family celebrated New Year's Eve with some fireworks and now we have changed our rental agreement to not allow fireworks. My Dad works hard to keep our neighbors happy and they are. In fact, some of our neighbors are here in support of us today.

Here are 3 reviews from lodge guests:

*"We stayed at the lodge for our women's church retreat! We had 28 women who all slept in beds and were very comfortable! The kitchen was perfect for preparing meals for our large group!"*

Here is another one:

*"We stayed at the Leavenworth Lodge for a company retreat and the house itself is spotless and large enough to sleep 25+ people without feeling cramped."*

And finally:

*"We stayed at the Leavenworth Lodge celebrating a 40th birthday with several families. It was really easy to find, next door to Smallwoods which is the best*

*country mercantile I've ever been to. It was also right next door to the Silvara Winery. Every night we sat out back and watched the sun go down while the kids rode their bikes around the patio (it's that big!). We had a wonderful time and I highly recommend the place to anyone wanting to be in the Leavenworth area that has a large group."*

Does this sound like a business that needs to be shut down? The restrictions the county is proposing would put us out of business.

Is it fair to punish our family and other owners that are doing it right? Shouldn't the unneighborly renters be fined severely for breaking existing laws? If you obey the speed limit, do you get a ticket for the car in front of you that is speeding? That wouldn't be right.

Please do not create new regulations. Instead, enforce the current laws. Do not punish people that are doing it right. Instead, impose heavy fines on the ones causing problems.

Please include this in the public record.

The Sheriff of Chelan County, Brian Burnett, was not able to be here tonight because of previous obligations, but he sent this statement regarding vacation rentals to be added to the public record:

**As a follow-up from our phone and meeting with your short term rental group last year in Leavenworth, I believe that there appears to be fewer complaints to our office or through RiverCOM local dispatch center against short-term renter than hotel guests in hotel facilities or long-term residents in Chelan County. Short-term residential disturbances on average can be easier to deal with by both law enforcement and property owners and managers compared to long-term residents. The land lord tenants laws in the state of Washington have a tendency to protect the renter making it much more difficult for the property owner or manager to deal with the issue at hand in an adequate or timely manner, outside of law enforcement issuing notice of infractions or criminal citations. Additionally, if a short-term rental group is behaving in such a way which violates their contract to use the premises, Law enforcement can work with property owners and property managers to remove the short-term renters for trespass should the property owners or managers request such and under proper advisement to the short-term renters. Long-term renters must go through a much more lengthy eviction process. Law enforcement rarely needs to return to the location in order to rectify the complaint but long-term rentals can add the challenge of repeat offenses by the same persons residing at the rental location. Obviously not all complaints are the same in nature and can be difficult to track or put into anecdotal stats as complaints will come in the form of noise complaints from neighbors or disturbance calls**



**due to disorderly, Domestic Violence or other miscellaneous natured calls warranting a response by Law Enforcement.**

**Sincerely,**

**Brian Burnett**

According to our county's sheriff, the 1,500 vacation rentals in Chelan County are not a problem. And if there is a problem, people can rely on existing nuisance laws, make a simple call to law enforcement, who will then take care of the matter, even up to eviction if necessary.

Tonight, you have heard complaints against vacation rentals and it is likely you will hear more. If the problems are real, why are people calling the commissioners to complain and not calling law enforcement to take care of the problem?

Please add this to the public record

15  
Comments from Barbara Rossing, 7785 E. Leavenworth Rd July 24, 2019  
regarding REVISED Chelan County draft short term rental code

Thank you for this revised draft. Our group of neighbors especially applaud the regulations' limit of number of occupants to 10. We hope a robust enforcement system will be put in place. We favor a per-bedroom registration fee, so that large rentals pay more than smaller.

*Int'l Bn/ln*  
*Code for*  
*Thantye/Manser*

**Specific Suggestions:**

Add back in line 33 (from the Manson code) which is crossed out, and make this a preamble to the entire document "Vacation rentals shall maintain the character of surrounding neighborhoods."

Rationale: the whole purpose is to maintain the residential character of neighborhoods. All specifics of the regulations need to be for this purpose. The rural residential character of all neighborhoods zoned RR should be protected.

Other Specific changes we would like to see in order strengthen the regulations:

1. District Use ~~Chart~~ *from*: Decrease 5 bedrooms to 4 bedrooms. *limit* Rationale: some people invariably sleep in other rooms, on hideabeds, so it would be difficult to enforce a 10-person limit in a house with 5 bedrooms. Two persons per bedroom is an excellent limit, with overall ten-person limit.
2. Lines 71-74: delete the word "overnight" so that daytime use is also limited to 10 persons (two per bedroom). Rationale: this limits large-group events such as weddings.
3. Line 74, Occupancy limits: delete "A guest is a person over six years of age." Rationale: Children count in the International Building Code limit of ten persons in transient accommodations. Children are people.
4. Lines 101-102, addressing complaints: Add "in person" so it reads, "A designated local property representative who will address complains and emergencies **in person** within 30 minutes;
- 5. Lines 108-09: Swimming Pools, Hot Tubs: Add "must be limited to registered guests only." Rationale: standard policy for hotels, motels, B & B's; necessary for controlling noise and large parties.

6. Lines 116: Rules of Conduct: Add "and on booking web site and in Contract." Rationale: prospective guests need to be informed of the rules in advance, before booking.

In addition:

We request a mechanism to address density, so that the number of rental houses per neighborhood does not exceed a certain percentage—probably 5-10%.

*Our* RR neighborhoods should not become "sacrifice zones," dominated by party houses at the cost of quiet neighborhood community. Entire streets must not become nightly rentals—as happened to Icicle Lane (according to a Wenatchee World article 2 weeks ago) and seems to be happening to Prusik Peak Lane.

With the City of Leavenworth enforcing its ban—which we applaud, a ban that also applies to the UGA—~~now~~ the epidemic is moving into *our* unincorporated RR neighborhoods, ~~and we~~ are becoming rapidly becoming saturated with short term rentals. A young working family across from us was told they must move out of their long-term rental at the end of this year so the landlord can turn it into a nightly rental. They tell me it's impossible to find an affordable long-term rental for their family in the RR neighborhoods of Leavenworth valley.

According to our research on other counties ~~and municipalities~~ the *you* County could legally regulate density via several possible options, or a combination of options:

- Option 1: Lottery a fixed number of permits, with a specific number of permits turning over each year (Pacific Grove, California—only a total of 250 permits; other rentals were "sunsetting"—this held up to legal challenge);
- Option 2: First come first served: Sell only a fixed number of permits per sub-area of the County, after which others must wait ~~for a permit to be surrendered~~ (Maui County, Hawaii) ~~similar to municipalities that limit the total number of liquor licenses or other licenses that can be sold per neighborhood in a city~~;
- Option 3: Limit the number of permits any one owner may hold (Maui County, Hawaii and Methow River District, Okanogan County, stipulate only one permit per owner or LLC); Rationale: Prevents concentration of ownership by investors and speculators. Protects future retirees or others who need to rent out one house.

- Option 4: ~~Lot size~~: If a house is in a subdivision that was granted a density bonus to decrease lot size-- smaller in size than the underlying RR zoning—all short-term whole house rentals should be prohibited—since the whole rationale for a density bonus is to help provide housing for residents.
- Option 5: Mandate a waiting period after new construction, before allowing a change of use to short term rental. (We suggest 5 years; this is the period in Maui County Code).

Rationale: On building permit application, the building department confirms that the signature box is similar to an affidavit. If a person indicates it is being built as a "single family home" it must stay that way following construction, for a certain period of time.

To underscore: This limiting of density is important for the FUTURE, or more and more new homes will be "flipped" in the Leavenworth valley and other desirable areas..

We increasingly see New Construction on East Leavnorth Road that never gets occupied as single family home, even though that's the building permit says—2 doors down from us is a nightmare case in point: the minute the owners got their occupancy permit, they immediately started renting out the house to 24 people as a "lodge," complete with a 16-seat theatre, 2 commercial kitchens, and 8 bedrooms. The noise is very bad at times..

Workforce housing is what the county Comprehensive Plan says we most need. There is nothing in the Comprehensive Plan that states any kind of need for more short-term rentals. The need is for residential housing, workforce housing, and affordable housing.

Therefore, there needs to be a mechanism going forward to curtail the flipping of new construction into lodges that were never intended to be any more than nightly rentals.

If people apply for a single family home building permit they should know they must occupy the house or rent it long-term for 5 years. This will help keep housing residential.

Density matters.

To summarize. RR Neighborhoods are for neighbors. Don't let neighborhoods become sacrifice zones, where 50% or more of houses are nightly rentals, house prices skyrocket, and community is destroyed..

Short Term Rental Regulation Hearing July 24, 2019

Testimony by Mara Bohman, Leavenworth

7840 E. Leavenworth Rd

I'd like to thank the county and the commissioners for addressing this very important issue of regulating Short Term rentals in Chelan County.

In the 6 years my husband and I have lived in unincorporated Chelan County, 3 miles south of Leavenworth

1. An 8 bedroom nightly rental complete with a commercial kitchen and movie theater was built across the street. None of the neighbors were notified when it opened for business, advertising a sleeping capacity of up to 24 people. The impact of this business on the neighbors was huge.

2. A single family home about a year ago, opened for business as a duplex to the east of us. Managed by Vacasa and advertised on sites such as Hotels.com, guests enjoy the 2 decks and hot tubs often into the wee hours of the morning. As many as 15 cars are often parked at the property. Garbage and recycling are placed in a commercial dumpster that is emptied every Tuesday morning at 5:30 am.

3. And now I have learned that the family who rents the home a few houses to the north, are being evicted so that the home can be used as a nightly rental.

The lucrative and unregulated nature of nightly rentals has turned our single-family residential zones into commercial lodging zones and the issue of density must ~~also~~ be addressed.

I ask that in addition to the regulations you are adopting, you also help to preserve available long term rental housing and the integrity of our neighborhoods by limiting density of short term rentals in specified zones. Many other communities have done this, ~~so through a lottery system such as with~~ the community of Manzanita Beach, and Newport, Oregon.

In addition, property owners must be limited to just one Short Term Rental permit, to help prevent investors from purchasing multiple properties to convert to short term rentals ~~such~~. Many communities have enacted this into their code, including our neighbor, Okanogan County.

References:

**OKANOGAN COUNTY NIGHTLY RENTAL CODES**

**5.06.050 Restrictions**

Only one dwelling may be rented per owner. Each property owner may rent only one nightly rental regardless of the number of properties owned. A nightly rental permit is required for a single dwelling on



a lot of record or for a second dwelling on a lot of minimum size for the zone in which it is located. For a second dwelling on a parcel to be rented as a transient tourist accommodation, the owner must live in the main residence. No permit shall be issued to the holder of an existing bed and breakfast license for a nightly rental structure on the same property. In no case shall the primary dwelling and the accessory dwelling be rented at the same time.

## **City of Newport Short-Term Rental Code Update Ordinance No. 2144:**

### **Summary of Key Changes      April 2019**

#### **Establishes License and Density Limits for Vacation Rental Dwellings**

- **Creates a Vacation Rental Overlay Zone (the "Overlay Zone") that restricts vacation rental dwellings to areas proximate to the City's major tourist commercial districts.**
- **Limits the total number of vacation rentals within the zoning overlay to not more than 200, with a specific cap number to be set by Council resolution. The City Council has asked that 180 be the limit set by resolution.**
- **Institutes spacing standards (i.e. proximity limits) to avoid concentration of vacation rentals along any given street segment.**

## **CITY OF PACIFIC GROVE**

### **Existing License Holders**

Over the last year, significant STR program changes have taken place. In May 2018, the City conducted a one-time STR Lottery that determined 51 STR Licenses to sunset on April 30, 2019. In November 2018, residents of Pacific Grove voted on Measure M and U which were subsequently passed, and approved on November 27, 2018. Both the STR Lottery and Measure M have direct implications on the vast majority of existing STR licenses. Please read the information below to understand how your STR license may be impacted and what license renewal requirements are:

**STR Lottery:** If your STR license was selected in the STR lottery; that means your STR license is scheduled to expire (*provided you have renewed your license*) and sunset on April 30, 2019. You must cancel/deactivate any online listings for this property effective May 1, 2019. Please also be advised that honoring any pending reservations, and advertising and/or renting your property as a Short-Term Rental without a license are violations of the Short-Term Rental Ordinance (PGMC 7.40).

Violations of the City's Short-Term Rental Ordinance are subject to penalties of 100 percent of the total revenue earned through illegal hosting. Penalties are assessed the day the illegal Short-Term Rental activity begins and continue to accrue until the violation is fully abated. Repeat violations may be subject to escalated penalties including referral to the City Attorney's Office for additional assessment (i.e. lien) on the subject property. Further, illegal STR's are ineligible from obtaining a STR License for two consecutive years provided that the property is located in either Coastal or Commercial Zone and meet all applicable City regulations.

**Measure M:** If your STR property is outside the Coastal and Commercial zoning areas, your STR License is scheduled to sunset on Wednesday, May 27, 2020. Since your current STR License expires on March 31, 2020, you will need to renew your STR license if you wish to maintain your license for the period of April 1 - May 27, 2020. STR Zoning information can be found through the [STR Database](#), [STR Map](#), or [pgparcel.net](#). Detailed instructions (including applicable fees) on your STR License renewal will be available on this website in early February 2020.

**Measure U:** Effective July 1, 2019, the Transient Occupancy Tax (TOT) rate will increase from 10% to 12%. Please contact [Lori Frati](#) at (831) 648-3133 for any questions regarding the TOT increase.

## **CITY OF MANZANITA**

Once a dwelling unit located within the R-2, R-3 or SR/R zones inside Manzanita's City limits passes inspection, the applicant will be placed on a waiting list if there is no license available. The number of short term rental licenses is limited in the R-2, R-3 and SR/R zones to 17 1/2 % of the total number of dwelling units within those zones combined. [Zoning Map with addresses](#)

Hi, my name is Zelda Holgate; I reside at 18720 Fir Loop, Leavenworth Washington. I am the vice chair of The Short Term Rental Alliance of Chelan County, a member of the Northwest Vacation Rental Professionals, have a degree in hospitality management and ~~I am~~ the proud owner/ operator of Natapoc Lodging in Plain, Washington. A property management company that operates 6 homes as short term rentals.

Natapoc Lodging was one of the first short term rental companies formed in the State of Washington. It began in 1989 specifically for the purpose of short term rentals. I bought the property management company in 2011 as a way to support myself after a divorce. It provides an income I can live on and I employ 3-4 people with a livable wage and a positive work environment. I have guests that have stayed at Natapoc Lodging for 30 straight years, making memories and spending money in the Plain Community.

I cannot understand why this is a hot button for community development and the commissioners. Why are the commissioners choosing to listen to a few very vocal residents who complain about noise, parking, garbage, and trespassing? All issues currently covered under code in Chelan County and apply to everyone, full time residence, long term rental and short term rental. Where is the substantiated evidence that short term rentals are an issue in the county requiring additional overreaching code? We have asked this question over and over and gotten no



answer. When I try to work with people who say they have a poorly managed short term rental as a neighbor I am continually turned down. They don't want my help in improving the situation but they have no issue with continually complaining to the county. The economic benefit that short term rentals bring to the county far outweighs the "not in my back yard" community complaints.


As the vice chair of STRACC and a constituent of Chelan County I have concerns with the way this process has been conducted. The biggest concern is a line item in the 2019 Community development budget that says vacation rental permit income of \$750,000 or 24% of the total budget. Mind you this was written before this process for new code began. This says to me that community developments decision has been made to permit and shows a lack of transparency on the County's part. A permit technician for community development said in a recent email "There is a draft permit currently being reviewed/revised. We still do not have a set timeline but I know our managers and director are trying to get this adopted ASAP!" There has been a rush to pass this code yet in the Wenatchee World Bob Bugert was quoted as saying "We want to make sure that we take this slowly and deliberately as we can and be as transparent as we can,"

STRACC believes that enforcement of the current codes for parking, noise, garbage and trespassing and the passing of HB 1798 will sufficiently deal with any ~~unsubstantiated~~ issues in the short term rental industry. We believe in the findings

that Washington courts have repeatedly held that homeowners have the right to rent their homes, and that a home is used for a "residential use" whether the homeowner rents the property for short-term or long-term periods.

If you are going to make new code you need to make it so that all residences, permanent, long term rental or short term rental have to abide by it. Do not single out short term rentals.

If the goal of this planning commission, community development and the county commissioners is to hurt our tourist and recreation community then by all means adopt this code. If your goal is to promote tourism as is in The Chelan County Growth management act then do not adopt this code.



YOUR EFFORTS WILL REDUCE TOURISM REVENUE, ~~TAX~~ ~~RECEIPTS~~, EMPLOYMENT, PROPERTY VALUES, AND TAX RECEIPTS FROM ALL STAGES OF THAT VALUE CHAIN. IN ADDITION, YOU WILL GUARANTEE A COSTLY LEGAL BATTLE FOR THE COUNTY THAT YOU LIKELY WILL NOT WIN. ~~FINALLY~~, YOU <sup>COULD</sup> EXPEND EFFORT ON THIS WHEN YOU COULD BE TACKLING MORE PRESSING ISSUES ELSEWHERE.

~~Commercial Are long term Rentals  
neighborhood not all Idyllic  
crumbling property rights  
A for community~~

Reava Davis - 8211 Lynn St, Peshastin

Peshastin Community is not overwhelming  
in support of shutting down Vacation Rentals  
as mentioned by Stan Winters.

The Peshastin Community Council (7 people)  
have tried to rally the community against  
VR and recently sent out a Survey trying  
to identify their desires to close ~~down~~ these  
down. They had very people reply (because they  
don't care) and almost  $\frac{1}{2}$  of the responders  
were in support of VR. A few people are trying  
to carry a loud voice for so many people that  
it does not reflect what's real.



1210 Dempsey Rd 98826

My name is Richard Thirlby. I have one brief suggested modification of the draft and a strong endorsement of a tool that would optimize efforts to regulate the crisis of Short-term rentals. First, a suggested change in the draft. Line 92 of the draft contains a classic "should vs must" error. Current state is quote " (E) Portable fireplaces/pits must be able to be locked when burn ban is in effect." I strongly suggest deletion of "able to be." The ~~end product~~<sup>draft</sup> would then say ~~the~~<sup>and</sup> portable fireplaces/pits must be locked when burn ban is in effect."

As we learn more and more about the efforts to regulate short term rentals, it has become clear that Chelan County is not involved in a ground-breaking process. In fact, effective solutions to this epidemic are well established. STR's were enabled by information technology.....the solution for eliminating the adverse effects of unrestrained STR's also has been accomplished with IT. For example, a vendor that uses IT for the solution, Host Compliance, has in excess of 250 clients. The demographics of their clients are remarkably similar to Chelan County: Hood River OR, Beaver Creek CO, Sun Peaks Mountain Resort Municipality, Town of Jackson, WY, City of Napa, CA, , and the County of Santa Cruz, CA to name just a few. Their testimonials are extremely positive: From Pasadena..Quote: "Host Compliance's Short Rental Market Overview Reports are invaluable. There simply is no cost effective way for an (internal) IT department to replicate the results. The short--term rental registration website that Host Compliance built for the City of Pasadena is streamlined, easy to navigate, and could not have been constructed in-house as efficiently and as cost effective." <sup>by</sup>

From the county of Mendocino, CA, quote "Host Compliance is an amazing platform to assist with locating non-compliant short-term rentals. After one complete year of using this software, Mendocino County generated revenue 10 times the cost ~~expended~~<sup>"</sup>.

In conclusion, uncontrolled STR's have had devastating adverse effects throughout the country. **We do not need to reinvent the wheel.** ~~Effective,~~ Cost effective methodologies to measure and treat the adverse effects of STR's density are readily available. I would strongly suggest that Chelan County learn from the successes of hundreds of cities and ~~as~~ counties across the country and leverage their experience by involving an IT expert such as Host Compliance now.



July 24, 2019

Board of Commissioners  
400 Douglas Street, #201  
Wenatchee, WA 98801

**Re: OBJECTION TO JULY 12, 2019 DETERMINATION OF NON-SIGNIFICANCE**

Dear Commissioners,

This office represents several concerned property owners who request their identity be kept confidential until this proceeds to litigation. The County has not complied with the State Environmental Policy Act ("SEPA") review when it issued a Determination of Non-Significance ("DNS") for proposed regulation on short-term rentals. Furthermore, because the DNS was issued under WAC 197-11-340(2), the County may not vote on this proposal within fourteen (14) days from July 12, 2019. The County produced no evidence that it employed the optional DNS process in WAC 197-11-355. Thus, any vote on July 24, 2019 will be unlawful.

**A. Request for State Environmental Policy Act Review.**

The Chelan County Proposal severely limits or prohibits short-term rentals in the County. This will reduce housing maintenance, encourage neglect or demolition rather than renovation of existing housing, remove housing from the short and long term rental market, reduce housing affordability, reduce the availability of housing for some segments of the population, and impact historic structures. These are significant adverse impacts to the already built environment, including housing and aesthetics. These impacts will harm nightly rental owners in Chelan County. Nightly rental owner interests are ones the county was required to consider in issuing a DNS, and the record is absence of such consideration.

WAC 197-11-340(3)(a)(ii) provides the lead agency shall withdraw a DNS if there is significant new information indicating, or on, a proposal's probable significant adverse environmental impacts. Our initial investigation indicates the County failed to comply with the requirements of the SEPA. The specific errors in the decision are outlined below.

We respectfully request that the County 1) provide additional public notice to affected stakeholders and opportunity to comment; 2) correctly describe the Proposal; 3) prepare and publish an adequate checklist; and 4) either (a) prepare an Environmental Impact Statement ("EIS") addressing the significant adverse environmental impacts of the

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Proposal or (b) make modifications to the Proposal or adopt mitigation measures to eliminate these significant adverse environmental impacts.

Under SEPA, "Agencies are encouraged to describe public or nonproject proposals in terms of objectives rather than preferred solutions." WAC 197-11-060(3)(iii); see also Department of Ecology SEPA Handbook, Section 4.1. To the extent that objectives are discussed in the nightly rental regulations (Section 17A.270.010 Purpose), there is no information demonstrating that the regulations will accomplish the objectives and there are no alternatives identified or discussed. The County failed to describe their Proposal in a way that encourages considering and comparing alternatives, in violation of WAC 197-11-060. The County fails to provide any evidence that the stated purpose of policy "to preserve the residential character of the areas in which [nightly rentals] are located" is achieved by the adopted regulations. The duration of use does not change the residential nature of a building.

**I. SEPA Considerations the County must consider prior to making a DNS finding.**

1) The SEPA checklist Part A Question 9 asks whether there are known land use applications pending for development projects related to the land uses addressed in the proposal. Our investigation is ongoing, but adequate investigation on the County's behalf would have revealed that the proposal at the time of its approval will affect all pending land use applications that include dwelling units because it restricts the future use of those units.

2) Short-term rental use is not limited to "visitors" but also provides needed housing for people working in Chelan County in a wide range of professions, including engineers, contractors, and technicians, and others either on a temporary basis or relocating here. The County regulations curtail this important housing supply.

3) Section 3 Water. Our investigation is ongoing, but adequate investigation on the County's behalf would have included a study as to whether the Proposal would actually increase the use of nightly rentals, thereby affecting surface, ground, and water runoff.

4) Section 4 Plants. Our investigation is ongoing, but adequate investigation on the County's behalf would have included a study as to whether the Proposal would require landowners to alter or remove vegetation to comply with the Proposal to accommodate, for example, increased traffic and parking.

5) Section 5 Animals. Our investigation is ongoing, but adequate investigation on the County's behalf would have included a study as to whether the Proposal would require landowners place fences or barriers to enclose their properties, thereby restricting, altering, or affecting the migration of wildlife.



*v. County of Spokane*, 53 Wn. App. 838, 847-848 (1989); *Indian Trail Property Association v. City of Spokane*, 76 Wn. App. 430, 444 (1994).

Here, the regulations will have significant adverse environmental impacts over time. The regulations will result in probable significant adverse physical impacts to the built environment, land use, housing, aesthetics and transportation. Property owners who rent their properties on a short-term basis must maintain these properties in excellent condition in order to be competitive in the market. Thus, properties that are rented on a short-term basis are often better maintained than those rented on a longer-term basis. In addition, property owners use the income from short-term rental to maintain their properties. The regulations severely limit short-term rentals. As a result, property maintenance will decline and blight will occur, causing significant adverse land use and aesthetic impacts.

### **III. Public Process.**

The purpose of SEPA is to inform the public and decision makers. The regulations have numerous significant adverse impacts and unintended consequences that were not acknowledged in the county's checklist. We request the County take into account information provided by short-term rental owners, small businesses supporting short-term rentals and short-term rental tenants.

### **IV. Conclusion.**

We request time to review the County's SEPA compliance. The regulations will result in significant adverse environmental impacts. WAC 197-11-340 (3)(a) provides: "The lead agency shall withdraw a DNS if: (ii) There is significant new information indicating, or on, a proposal's probable significant adverse impacts."

We respectfully request that you consider all of the information we raised regarding the regulation's adverse environmental impacts and either 1) issue a DS and prepare further environmental analysis, which may include an EIS, addressing these impacts; or 2) make modifications to the regulations established by the Proposal or adopt mitigation measures to eliminate the environmental impacts.

Sincerely,

ALEX THOMASON  
Attorney at Law



Kat Thirlby  
1210 Dempsey Rd  
98824

In reviewing the proposed draft, the DENSITY of Short Term Rentals and their impact needs more consideration. Many neighborhoods in rural Leavenworth have a disproportionate number of rentals and your constituents do not have neighbors and can not enjoy their homes or residential property. Controlling the concentration of rentals in geographically defined areas and the number of units an owner can have, prevents clustering of businesses and the exploitation of local real estate opportunities. Unrestricted density favors the rental industry, facilitates OVER TOURISM and will eventually ruin all that we have here. Caring communities will disappear and our once pristine recreation environment will be irreparably damaged. This affect was reported recently in an embarrassing Seattle Times Article about the abuse of The Enchantments. The Icicle and Wenatchee Rivers are next. All enabled by the huge crescendo in unrestricted, dense, rental development outside of commercial areas. Big investors, purchasing and developing multiple properties prevent our local work

force, families, first time buyers and retirees from having affordable housing. Hank Lewis quoted Mayor Farivar in May of 2017 and said if a home for sale is seen as a potential rental property, its listing price goes up \$100,000. A four bedroom home for a family of five with two cars, turns into a rental for 10 or more people bringing eight or more cars into our area. This creates demands on our natural resources, ~~public~~ infrastructure and recreational environment. Visitors not educated about fire safety hold us at risk every season. There are rural residential areas of Chelan County where NO rentals should exist. Please address the density issues and the number of rentals an investor can own. We are losing our community. I know Dave Kuhl has useful data from Host Compliance that validates this concern. We can not risk the consequences of losing our neighborhoods and ruining the environment. Love Leavenworth? We're Loving it to death.

Stan Winters  
509 293-0457

I'm Stan Winters

I was elected to serve on the Peshastin Community Council two years ago. As a council member I have a responsibility to work with the council to "make informed decisions that are in the best interest of the community as a whole".

Our plan was to work toward making Peshastin a better community by doing more things like our annual Pet Parade and our Santa Claus breakfast. But instead we were broadsided by the issue of short-term rentals, which according to our Peshastin Urban Growth Plan, are not allowed in the residential areas of Peshastin. That has been the focus for more than two years now. Multiple houses in Peshastin have been converted to short-term rentals. Violation notices have been sent by the County, appeals have been made, and an Administrative Determination that short-term rentals are indeed not allowed in the residential areas of Peshastin has been delivered. This isn't in question. What hasn't happened is any enforcement of existing Chelan County Code.

The planning and public input that you, Chelan County, are working on now, was done in Peshastin a decade ago, beginning in 2005.

Community members in Peshastin invested hundreds and hundreds of hours to create our Urban Growth plan. They held public meetings, they used surveys, they held open-houses. They collected input from as many people and groups as they could. The resulting plan, which was adopted by Chelan County and is part of Chelan County Code today, set a vision for our community which includes future development, sustainable growth, and adequate housing that fulfills the needs of all segments of the population.

Now, ten years later, the county wants public input about short-term rentals. As I said, in Peshastin, we have done this work. But in response to these illegal short-term rentals we have gathered more input.

We have done more surveys, community members have signed petitions asking the county to enforce our UGA, and our last community council election, when we had two seats open, became a referendum on this issue. About 110 Peshastin community members gathered at our Memorial Hall for this election in which two of the short-term rental owners/operators (who happen to be married to each other) ran for the open seats. The defining issue of this election was short-term rentals. There was a time for a short introduction, then voting by secret ballot. The two winners of the election, who were in favor of maintaining the current zoning regulations, won more than 98% of the vote.

We also put this issue on our Community Council agenda for three meetings this spring, asking for community input. The number of people who attended and gave their input in favor of allowing short term rentals in the residential areas of Peshastin was exactly zero.

The Housing section of the Peshastin UGA starts with "The appeal of a community can be attributed to many factors; however, the quality of its housing stock and residential neighborhoods is probably the best indicator of its viability in the long run". The primary goal is to "Encourage housing development for all income levels by defining the different types of housing and densities allowed, and to Support and encourage the retention and rehabilitation of existing housing units."

Nowhere in the plan does it say that Peshastin should allow or encourage the use of our residential areas and housing stock to be turned into mini-hotels for tourists, that benefit absolutely none of our community members, removes housing opportunities, and destroys our neighborhoods.

The idea that a short-term rental association would "self-regulate" is laughable. These are people who can hold their Chelan County violation notice in one hand and with the other hand sign an AirB&B Terms of Service document that reads: You represent and warrant that any Listing you post... will (ii) comply with all applicable laws (such as zoning laws).

There are some very significant development opportunities happening in Peshastin now. Depending on what the county commissioners decide, those developments will either provide much needed housing for upper valley residents, or they will enrich a few land owners who will build and operate mini-hotels, which does nothing to create or support our community.

The community of Peshastin asks for the county to honor the work that our community members did to create our Urban Growth Document and help us by, without delay, enforcing the zoning codes that have been in the Chelan County code for at least 10 years.

Stan Winters  
winterss1@mac.com  
509 293-0457  
8200 River View Rd  
Peshastin WA 98847

Sean

## 7/24 STR Presentation Outline

- A. Introduction and background.
  - a. Love Leavenworth 8 Years in the STR field
  - b. STR's Now woven into the tourism lodging fabric across our nation
  - c. Two years of working with local government.
  - d. Introduction of solutions (Responsible party form)
- B. Positives of STRs
  - a. STR lodging benefits families, friends, work groups and business travelers
    - i. Creating a wonderful home away from home environment.
    - ii. Open spaces within the home allow for wonderful friends and family conversations
    - iii. Families with small children prefer STR's
  - b. Allows homeowners the ability to still use their home as a vacation for themselves..
  - c. Economic benefits (List off of STR Data)
  - d. Aesthetic value benefits
    - i. STR homes are usually well maintained
    - ii. Increased beautification of the neighborhoods
  - e. Jobs (List data)
- C. Identified potential issues by County
  - a. Noise Parking Garbage
  - b. Neighborhood character
  - c. Affordable housing
  - d. Evidence- 1 complaint call per week from neighbors to County officials. This works out to roughly one call for every 3000 nights of STR rentals
- D. The real issue's
  - a. Neighbors that do not want to see STR's in their neighborhoods and simply will not tolerate STR's regardless of how well managed
  - b. A small amount of STR's homeowners or managers that improperly handle neighbor issue
  - c. Most notable issue is the lack of reasonable communication between STR owners and neighbors. This issue can be easily resolved with simple regulation.
- E. STR's are effectively self managing
  - a. Airbnb and VRBO review processes
  - b. Market driven solutions
    - i. It behooves STR owners to have a well maintained home, great communication with guests and to prevent bad guests for renting.
  - c. Liability driven solutions

Myth Busters  
Party House

- i. STR homeowners are critically aware of the life and safety issues and then much more.
- F. Love Leavenworth Clients and myself support no new regulations
  - a. Very few actual complaints
  - b. HB1798 resolves most issues and goes into effect in 4 days
  - c. Support STRACC in their fight to stop this current regulatory process
  - d. LL clients and myself fully support BuildingNCW's positions opposing this code
- G. The identified issues can be resolved with much less restrictive code
  - a. HB1798 identifies issues and properly regulates the STR industry
  - b. As previously mentioned the industry is essentially self regulating with market driven solutions
- H. Line by Line arguments for proposed Draft Code including Landuse Tables, Definitions and proposed code 11.93.380
  - a. Pages 1-4 Table Use Chart and permitting- Why permit when Long Term Rentals are an acceptable use?
    - i. STR's fundamentally operate the same as an LTR. Guests cook, sleep, eat, shower and watch sports and news on TV just as any other residential tenant or homeowner would. Why differentiate our State Supreme court did not in the Wilkinson VS Chiwawa Communities Association in 2014.
      - 1. If a vacation renter uses a home "for the purposes of eating, sleeping, and other residential purposes," this use is residential, not commercial, no matter how short the rental duration. Ross, 148 Wn. App. at 51-52
    - ii. Permitting- There are numerous issues as this proposed code does not identify
      - 1. Permits can be denied or revoked due to non-compliance. Very concerning.
      - 2. Time to actually permit
      - 3. What process of permitting is being used Limited Administrative Review or other...
      - 4. Costs of Permit not listed in code language
      - 5. How those permit fees are used- It is my layman's understanding that permit fees can only be used to process the permits. How will the county pay for compliance costs. Additional fees?
      - 6. Currently the County has a massive backlog of compliance enforcement (900?). 1500 + new permits annually recurring and the compliance issues associated with those seems like it would bog down CCCD even more.
      - 7. Request to Strike permitting from proposed code language or revisit with license or registration language

- iii. Why limit STR's to 5 bedrooms? What is the rational?
  - 1. Discrimination-County is opening themselves to litigation from homeowners that can afford to purchase large second homes in our area.
  - 2. Limiting the number of large homes would generate the market to respond by simply adding smaller homes and increasing the number of STR's in each neighborhood. Seem counterproductive.
  - 3. Request to strike bedroom restrictions
- iv. CUP Requirement in Peshastin
  - 1. It is odd that the Peshastin UGA or any UGA in our County should have differentiated codes from the county when STR's are concerned.
    - a. The logical and rational argument being that UGA's are used to designate areas of growth and to protect the right of ways and other items in those areas where future development is concerned. The use of an STR is residential and can easily be changed from an STR to an LTR or owner occupied home almost overnight (though 6 months advance notice would be appreciated) should a city ever wish to incorporate UGA zoned areas. The UGA designation should have no bearing on the residential use of a home and County code concerning STR's should be uniformed in all areas of our County.
    - b. The County enforcing City ordinances in UGA's areas is legally suspect at best due to the fact the homeowners within UGA's can not vote in the cities and have limited options to fair city representation. The County would be wise to steer clear of this potentially legal issue in my opinion.
- v. Request to remove permitting process from this code proposal as it does not solve the problems of STR's existing or operating.
- b. Line 71--74 Regarding occupancy. The proposed code is to limit STR occupancy to two guests per bedroom. A bedroom is defined as being permitted by Chelan County by building permit. Guest is defined as anyone over 6 years of age. What is the rational.
  - i. Super restrictive in nature and unreasonable. Many homes in our area have lofts, dens, daylight basements that all offer safe egress options and are currently being used by STR's, LTR's and homeowners safely in our County without negative incidents. These sleeping areas may not be called out on the building permit though this code discriminates against STR's by not including them as viable sleeping options.



- ii. By reducing the occupancy available in each current STR the County is increasing a market need for more STR's. Again and coupled with the "no 6 bedroom rule" the County is inadvertently driving the need for more smaller homes to be used as STR's. Very counterproductive
  - iii. I would ask that the occupancy limitation be struck from the proposed code.
  - iv. If the request to strike is not considered I would request that a much more reasonable occupancy limits be set. Considering the home's SF size and layout, such as in many counties and municipalities across our nation have adopted. I would request that real conversation happen concerning this issue.
  - v. Severly limiting the occupancy rates would have an immediate and negative effect to the STR industry as well as forcing homeowners to find ways to avoid the occupancy regulations through dishonesty or loopholes. Please think this one through.
- c. Line 75-77 Solid Waste Removal. Why is this here.
  - i. County Code already exists to regulate solid waste issues. Why the specific call out?
  - ii. This issue is handled on the self regulating side for STR's. Guests arriving to full garbage cans or worse garbage strewn all over the yard are not happy. The reviews from these incidents to online platforms will quickly make any STR homeowner or PM comply.
  - iii. Very little factual evidence exists that this is an issue for any homeowner in our County let alone STR homeowners.
  - iv. Request to strike this from the proposed code
- d. Line 78-79 Onsite Parking. Why is this here? Is parking really a huge issue?
  - i. Table 11.90-3 of CCC lists that residential single family residences are required to have 2 spaces per dwelling unit. This code is sufficient and should be the code used for compliance in all homes across our County
  - ii. This is another self regulating issue as do you know what guests don't like? Parking tickets, Nasty notes from neighbors or having their car towed while on vacation. Any of those issues would generate an STR owner to react quickly and notify guests what is acceptable for parking at their homes.
  - iii. County code and laws exist to handle parking issues. Why is this code needed?
  - iv. Request to strike from proposed code or adopt Table 11.90-3 provisions
- e. Line 80-81 Posting address. Why is this here? What problem does it solve?
  - i. I personally have no objections to posting the address of an STR clearly

- ii. Addresses posted clearly are pretty critical in the STR world. Do you know what STR owners and Operators don't enjoy? Phone calls from guests trying to find their homes. The guests don't enjoy it either.
  - iii. Request to strike from the proposed code though if left in do not object.
- f. Line 82 No outdoor signs. Why is this here?
  - i. The logical argument against this proposed line item is simple. By placing a reasonable sign with the homes STR name at the front of the house this will confirm for guests that they have arrived at the correct home and avoid inadvertently bothering a neighbor.
  - ii. We have several homes on shared drives that signage has helped reduced any guest confusion and the neighbors next to the STR's were very happy that we resolved the issue with signage.
  - iii. Signage has little to no marketing value to STR operators.
  - iv. This line item actually creates more issues than it resolves.
  - v. I would suggest that the County signage regulations in CCC11.92 are sufficient and would again request to strike this line item from proposed code.
- g. Line 83-85 Taxes Why is this here?
  - i. HB 1798 effective 4 days from tonight has similar if not exact ordinance in place. See Line 32 of Section 4 of HB1798 Is there a need to duplicate state law?
  - ii. I personally do not object to any STR operator or manager paying all applicable taxes in a timely manner.
  - iii. Request to strike line from code as it is redundant and not needed.
- h. Line 86-93 Existing County Code callouts except line 92-93 Why are these here?
  - i. Lines 88-91 exist in County code currently and are laws regulating private property nuisance issues. The codes listed are reasonable and just but if already codified why call them out again in STR code. Seems redundant. Request to remove from proposed code with exception to lines 92-93
  - ii. Lines 92-93 Fire pits and outdoor burning.
    - 1. This is good common sense addition to insure that STR operators are informing guests of fire dangers with the exception of locking firepits. The reason for the exception is that all fire pits/rings may not be easily secured and locked. I would request that signage with warnings in home and in the actual pit would suffice. Note: We warn our guests that failure to observe our burn ban notices are grounds for eviction and fines from law enforcement.
  - iii. The nuisance issues are tough to enforce whether the home is a STR , LTR or owner occupied and I'm sure cause headaches for both law

enforcement and local government alike. I would argue that STR homeowners and operators have nothing to gain by ignoring or actively disturbing their neighbors. In fact, problems with neighbors could easily become problems for guests and therefore may have a negative impact on reviews of the home. It is in an STR operator's best interest to ensure that their guests are abiding by all local laws as well as being good neighbors while residing in homes.

i. Line 96-109 Management Plan

i. Request to strike as the bulk of these requirements are already called out in HB 1798. If unable to strike out please consider the arguments against individual line items.

1. Line 98 Rules of Conduct- Hard to argue against as the County has not described what the Rules of Conduct are. Please Strike from proposed code or define.
2. Line 99-100 UBI and STR operator info. Please Strike as HB 1798 specifically calls out STR identification section 3 Page 3 which should be sufficient.
3. Line 101-102 Local Contact- Please Strike also listed in HB 1798 Section 3 Page 3.
4. Line 103-104 24 Hour contact- Please strike as HB1798 already implies 24 hour contact in section 3 page 3.
5. Line 105-107 Exit routes and emergencies.... Please strike as HB1798 addresses the valid sections of lines 105-107. Furthermore logic says that having a water shutoff or breaker box and other location information on file will sit on a hard drive in some local and not be of any real use in an actual emergency. Why does the County want this info?
6. Line 108-109 Pools- County code already specifically covers the requirements for public pools. Please Strike as this line item is redundant.

j. Line 110-115 Notice to nearby neighbors

- i. I personally do not disagree with the notification other than possibly limiting the radius to a more reasonable 100 feet. Furthermore I think that this is just about the only proposed code that actually works towards solving STR issues with neighbors.
- ii. Rationale of the 100 foot limitation is that assuming the neighbors nearby are full time residents that they also know other full time neighbors in the area and by default will notify any neighbor having issues with an STR.

k. Line 116-121 Trespassing

- i. This is super restrictive and discriminates against STR's requiring the signage and notifications.
- ii. How silly to install signage on fully fenced in homes, forest service boundaries and other areas where no signage is needed.
- iii. Request to please strike from proposed code or rework language that handles trespassing on a case by case basis where needed. Blanket code on this issue is in my opinion a really bad idea.
- iv. Personal note. If the neighboring homeowners are bothered by potential trespassers than it should be up to those homeowners to post signage on the proper boundaries.

l. Line 122-123 Posting permit # on listing sites

- i. Fundamentally it is noted that permits are strongly opposed previously Should permitting, registration or licensing be codified I would have no issue with this requirement.

m. Line 124-131 Life and Safety Requirements

- i. The owners/operators of STR Rentals are acutely aware of the life and safety potential issues as well as much more minute liability exposures with in their own homes. The majority of STR homeowners and operators want their guests to have safe and injury free stays.
- ii. I would like to express that great caution be considered here by County officials. If a guest in a STR were to be injured in a permitted and inspected STR home would the County be exposing themselves to unnecessary liability. Costly insurance premiums and exposed liability may not be a good thing.
- iii. Sections 2-5 of House Bill 1798 explicitly cover liability concerns and even require that STR owners carry commercial liability insurance. I would guess that those involved with state insurance exposure pointed out that limiting exposure of government to liability is preferred..
- iv. I personally do not have issue with the life and safety requirements in the present code as they are reasonable and when it comes to life and safety redundancy is a good thing.

n. Line132 Transferability

- i. This requirement is super restrictive as the guests are renting a home. A STR with calendar full of potential guests adds value to a home and increases the sales price (and taxes on that home price). Making permits non transferable is restrictive as to change permit holder information would be reasonably simple at a County level.
- ii. What is the rationale for requiring this line item. It seems it would burden the County with more permitting process and inspections for a home that

is already certified to operate as a rental. Request to strike line item or change to permit transferable.

o. Line 133-135 Advertising

- i. This language seems redundant as it is assumed that if a permit is required and an individual did not have a permit that they could not advertise the availability of the home. .
- ii. Other than opposing the permit process if the permitting process were approved this line item is unopposed.

p. Lines 136-141 Enforcement

- i. A major concern of STR owners and operators is the enforcement section. A disgruntled neighbor unhappy that a STR is operating in their neighborhood now has a playbook on how to have a STR permit revoked. Specifically concerning are:
  - 1. Verifiable violation- What does this mean and who verifies? What are the time limits that a complaint stays in place for? 1 year? 10 years?
  - 2. Revoking permit- Essentially this is 3 strikes and you're out. Very concerning and may have real impact for those considering purchasing or starting an STR. This offers little stability for potential STR operators.
  - 3. May create extra neighbor on neighbor issues and encourage extra neighbor complaints about STR's that are reported to local law enforcement and to County leaders. This seems counter productive to reducing the complaints by neighbors into government officials.
- ii. If permitting is required please revisit the language and add protection against unwarranted complaints this is ultra concerning and may have very negative effects on the STR operators.

- I. Closing- In effect I believe I have laid out that little real problems exist that this entire draft code will resolve and in some cases it may even create more rentals which I'm sure is the exact opposite effect intended. If passed in it's current form this code could create many more issues for neighborhoods, create bottlenecks for permitting and compliance at the County level and may upset a thriving self regulating market that has economic benefits for the surrounding communities. Please consider sending this proposal back to the drawing board and create something that actually works.

July 23, 2019

Chelan County  
Department of Community Development  
316 Washington St., Suite 301  
Wenatchee, WA 98801  
Attention: Kirsten Larsen

**Re: Comments on Proposed Short Term Rental Code Amendments (Title 11 Zoning) – July 24, 2019 Public Hearing**

Dear Ms. Larsen,

This letter provides my comments on the proposed code amendments to Title 11 (Zoning)<sup>1</sup> of the Chelan County Code concerning short term rentals (STRs). Please include these comments in the public record associated with the July 24, 2019 public hearing on this topic.

Before getting into more specific issues, I have a general comment that pertains to the overall process that has led up to the proposed code amendments. When the development of these code changes was being discussed in early 2018, Chelan County indicated that a public taskforce would be created to help guide the development of new STR rules. I indicated at that time that I would like to be a part of that public taskforce. It is disappointing that this did not happen, and that public input is only now being allowed after the draft code amendments have been developed. This makes it that much more difficult for the public to have a meaningful impact on how Chelan County will address STRs.

Further, the County was initially going to hire a consultant to review how STRs were being regulated by other local governments. It was hoped that this would have resulted in a written document that could be shared with the public to get ideas on how to proceed, as was done by most other local governments that have reviewed this issue. This apparently did not happen (despite a Request for Qualifications being prepared) and I have not seen any equivalent document prepared by County staff.

Along with this, I would point out that while the County has attempted to address the question of “how” operating STRs should be regulated, it has failed to address the question of “how many” and “where” STRs should be allowed to exist, particularly in areas that are already highly impacted by STRs. This issue is particularly appropriate in the Lake Chelan Valley, where an extremely high percentage of existing dwelling units are considered to be seasonal instead of long-term.<sup>2</sup>

Having such a large percentage of the housing stock in seasonal use (e.g., used as STRs) has a profound negative impact on long-term housing affordability, traffic, business sustainability, and overall quality of

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<sup>1</sup> Chelan County is also proposing changes to Title 14 to add new definitions, but I have no comments on these changes.

<sup>2</sup> For example, the Chelan County Comprehensive Plan estimates that seasonal homes comprised 34% of the housing stock in Manson in 2010. The City of Chelan Comprehensive Plan estimates that the percentage of houses within the city limits that are occupied seasonally has increased from 5.2% in 1980 to 32% in 2014. The percentages for both locations likely approach or exceed 40% given historical growth trajectories.

life for residents. In April of 2018 I prepared a white paper specifically on this issue in anticipation of these actions by Chelan County. Although it has taken much longer to get to this point than the County originally anticipated, the analysis in this white paper is still relevant, with the only changes being that the impacts of STRs in the Lake Chelan Valley have already gotten worse in terms of housing prices, the costs of construction, traffic, and the degradation of the livability of the area for long-term residents.

I have included this white paper as Attachment A to this letter and it forms the underlying rationale for why I am requesting that Chelan County consider limiting where and how many STRs are allowed in the Lake Chelan Valley portion of the County. I have therefore divided my comments into two parts:

- Comments pertaining to the need for Chelan County to restrict the overall number and/or locations of STRs in the Lake Chelan Valley portion of the County, and
- Comments pertaining to the proposed Title 11 code amendments and the associated Staff Report.

### **1. Restricting the Number and/or Location of STRs in the Lake Chelan Valley**

As part of the County's review of the need to further regulate STRs in Chelan County, it is not apparent that any assessment was made of the actual impact of STRs within the County. This is a fundamental issue and one that has been properly assessed by many other local governments in the Pacific Northwest and throughout the U.S. In many cases, particularly in areas highly impacted by tourism, allowing STRs to proliferate without limitation has been found to adversely impact long-term housing availability and cost, traffic, and livability for long-term residents. This issue is thoroughly reviewed in Attachment A to this letter.

There are areas within Chelan County that are much less impacted by tourism than the Lake Chelan Valley (which includes Manson and Chelan). As a result, it is possible that it makes sense to treat areas outside of the Lake Chelan Valley different than what I am proposing in this letter. My comments are therefore specific to the Lake Chelan Valley and the County can decide if the proposed solutions are applicable elsewhere. As has been used by other local governments, a special STR overlay district could be created to apply STR regulations specific to the Lake Chelan Valley that might not be applicable elsewhere within unincorporated Chelan County.

Additionally, because the City of Chelan and the unincorporated areas in the Lake Chelan Valley are inextricably intertwined in terms of housing markets, traffic, and available public resources, it would make sense for STRs rules for Chelan and the other areas of the Lake Chelan Valley to be similar. Not doing so makes it extremely difficult to address the impact of STRs to the area. I therefore strongly urge the County to work with Chelan to come up with similar, compatible STRs regulations.

There are two obvious ways to restrict the overall number of STRs in an area to help reduce their negative impacts on a community:

- Restrict the areas where STRs are allowed.
- Restrict the total number of STRs that are allowed.

In many cases it may make sense to utilize a combination of these two approaches.

It's easy to argue that STRs just simply are incompatible within certain locations. For example, having STRs within areas full of long-term residents generally does not make sense. Fundamentally, long-term residents and tourists have different priorities. It is clear that Chelan County staff understands this issue



to some degree and is trying to determine how to ameliorate these impacts to long-term residents through a series of new requirements with associated methods of enforcement. What these new requirements do not address, however, is the impact that STRs have on driving out long-term residents by increasing long-term housing costs (whether renting or buying) and degrading the quality of life for these residents.

The obvious solution that has been utilized by other local governments is to simply not allow STRs in these areas. Examples include:

- Chelan, Washington: STRs are not allowed within residential zoning areas.
- Leavenworth, Washington: STRs are not allowed within city limits.
- Pacific County, Washington: STRs within residential zoning area are not allowed unless a special use permit is obtained; applying for a special use permit requires a public hearing process allowing for public comment and input. During the permit review process, the Department of Community Development or the Hearing Examiner may impose additional conditions on the project such as additional parking, improved access, landscaping, or additional screening to ensure the proposed vacation rental is compatible with the surrounding residential character.
- Gearhart, Oregon: STRs are banned in low- and medium-density residential areas.

These cities/counties are both highly impacted by tourism and have made the prudent choice to ban STRs within certain residential areas. In order to preserve the livability of our community, I request that Chelan County do something similar within the Lake Chelan Valley.

Another approach to slowing down the adverse impact of STRs within the Lake Chelan Valley is to limit the total number of STRs allowed. Some variation of this approach has been utilized by a number of areas impacted by tourism. Examples include:

- Walla Walla, Washington: Starting in 2017, no new STRs are allowed anywhere in the city unless they are owner-occupied. Non-owner-occupied STRs previously in existence were allowed to continue to operate if continuous compliance with STR regulations could be demonstrated.
- Newport, Oregon: 2019 STR regulations restrict total STRs to no more than 200 (a lower number may ultimately be used). STRs are restricted to a Vacation Rental Overlay Zone.
- Cannon Beach, Oregon: Starting in 2004, the total number of STRs was limited to 92.
- Manzanita, Oregon: STRs within R-2, R-3, and SR/R zones are limited to 17.5 % of the total number of dwelling units within those zones combined.
- Seaside, California: No new STRs were allowed after April 10, 2018.

Again, these are areas that are highly impacted by tourism. The local governments evaluated the negative impact of STRs on their communities and determined that the total number had to be restricted to preserve the livability of the area. It's also important to note that as the tourist population increases due to the increase of STRs in an area, the impacts on traffic and available resources ultimately makes the area unpleasant for tourists as well.

I recommend that Chelan County review not only the STR regulations for the communities specifically noted in this section, but the rationales provided by each for making the restrictions that they have.

***Simply regulating STRs without restricting the locations and number of STRs as Chelan County is currently proposing will do very little to preserve the livability and economic viability of the Lake Chelan Valley for persons across all income ranges.***

There is clearly an issue for property owners that are currently renting out their homes as STRs. These people may be operating in compliance with all currently-applicable laws and are dependent on the STR income to prevent financial distress. It would be unfair to these people to suddenly restrict their ability to rent out their home as an STR. Other local governments have dealt with this issue in an equitable manner, providing useful examples to Chelan County.

In many cases, local governments have “grandfathered” existing STRs if they are being operated lawfully. Often these grandfathered STRs can be slowly removed from the rental pool if future property owners are not allowed to use the homes as STRs or if STR permits are allowed to expire without the automatic right for renewal.

Although there are many possible approaches to how STRs in the Lake Chelan Valley could be limited to reduce their adverse impact on the community, I will provide one plausible approach that would be consistent with what other local governments have done and provides a reasonable degree of fairness to existing STR owners.

- Disallow STRs within low- and medium-density residential areas with a grandfathering provision (alternatively, allow STRs only within high-density residential and other types of zoning districts with a grandfathering provision).
- The grandfathering provision would allow STRs that can demonstrate that they are operating lawfully at the time the new restriction is proposed to continue to operate as STRs. “Operating lawfully” would mean complying with all currently-applicable permitting requirements (e.g., with a permit if within the Manson Urban Growth Area), business licensing, and tax codes.
- Existing STRs in low- and medium-density residential zoning that commit a third violation of new STR operating rules (e.g., as described in proposed 11.93.380(11)) would lose their grandfathered status.
- Existing STRs in low- and medium-density residential zoning that are transferred from one owner to another would lose their grandfathered status.
- Based on the number of existing STRs operating legally in the portion of unincorporated Chelan County within the Lake Chelan Valley, place a cap on the total number of STR permits that Chelan County will issue. This cap could always be revisited and adjusted in the future as necessary. Again, this area could be defined by a special STR overlay district if the County wanted these provisions to apply only to the Lake Chelan Valley.

Taking these steps would begin to bring the STR crisis under control, not cause any immediate shocks to the number of available tourist accommodations in the Lake Chelan Valley, and provide long-needed protections to long-term residents. It is obvious that the City of Chelan has been willing to protect their long-term residents from many of the adverse impacts from STRs and it's time for Chelan County to do the same for its long-term residents.

## **2. Comments on the Proposed Title 11 Code Amendments**

I also have some comments on the proposed amendments to Title 11 of the Chelan County Code. The proposed land use charts under 11.04.020, 11.22.030, and 11.23.030 would indicate that STRs are a permitted use in various residential zoning areas. As indicated in Section 1 of this letter above, I

generally oppose allowing STRs in areas zoned for low- and medium-density residential use. Specifically, I would propose that STRs **not be permitted** in the following zoning areas based on the rationales provided in Section 1 and Attachment A:

- In 11.04.020: RR20, RR10, RR5, and RR2.5
- In 11.22.030: R-1 and R-2
- In 11.23.030: UR1 and UR2

This would provide some consistency in the Lake Chelan Valley between the County's STR regulations and those already in place in the City of Chelan.

Please make the following grammatical corrections in the proposed ordinance language:

- 11.93.380: "Where short-term rental is allowed by this code..."
- 11.93.380(3): "...solid waste receptacles that are protected from wildlife."

Proposed 11.93.380(4) requires one on-site parking space for each two bedrooms, indicating that this is consistent with Chapter 11.90. I do not see how this is consistent with Chapter 11.90 since this ratio is not mentioned anywhere in this chapter. Off-street parking should be consistent with requirements for bed and breakfasts and guest inns; i.e., one space per bedroom. This is also consistent with STR regulations in other areas.

Proposed 11.93.380(10) should be renumbered as 11.93.380(1) and all other subsections of 11.93.380 renumbered accordingly. It is confusing to start referencing permit numbers, etc. in lower-numbered subsections before arriving at the requirement to have a permit.

There should be a requirement that the location map described in 11.93.380(9)(A)(v) be posted in a prominent location within the home for easy reference by renters.

The process of certifying compliance as specified in 11.93.380(9)(E) should be more clearly spelled out. Will this certification of compliance be performed by County staff, a County representative, and/or a certified independent compliance inspector?

Consistent with STR regulations in other areas, there should be a requirement that the STR operator provide proof of liability insurance of at least \$1,000,000 for the STR business.

Consistent with STR regulations in other areas, there should be a requirement for the satisfactory completion of an Operations & Maintenance (O&M) inspection of any existing on-site sewage disposal system (septic) prior to the initial vacation rental license issuance and every three years thereafter, or more frequently as determined by the Chelan-Douglas Health District. This is necessary to ensure that the on-site septic system (if applicable) is adequate to handle the short-term loads associated with STRs and not cause any health, safety, or nuisance issues.

### **3. Comments on the Staff Report**

The following comments pertain to the Staff Report with file number ZTA 19-004 associated with the proposed Title 11 and Title 14 code amendments.

It is disappointing that the Staff Report makes no reference to the thought process that was used to develop the proposed code amendments to address STRs. There is no evidence that the County

considered the broad range of impacts from STRs, reviewed the impacts from STRs considered by other local governments, or looked at the suitability of the solutions found by other local governments for addressing STRs. From the public's perspective, it does not appear that the County took a comprehensive look at this issue and started with the flawed premise that STRs should be allowed in all locations in unlimited numbers. I believe this is a gross disservice to the majority of the residents in Chelan County.

My remaining comments on the Staff Report reference the same Chelan County Codes used as section titles in the Staff Report.

CCC 14.13.040(1) – The Staff Report notes that the code amendments are intended to “...*address complaints received by the County in regards to the impact of short term rentals on neighborhoods...*”. I would argue that the proposed code amendments do not go far enough in addressing the adverse impacts to these neighborhoods and that the obvious way to address the conflicts between STRs and long-term residents in neighborhoods is to eliminate the conflict; i.e., do not allow STRs in low- and medium-density neighborhoods as has been done by the City of Chelan and many other tourism-oriented communities. This was apparently not even considered by Chelan County staff.

CCC 14.13.040(2) – The Staff Report claims that the proposed code amendments support “...*the Growth Management Act goals for (4) Housing, (5) Economic development, ...*” However, when these Growth Management Act (GMA) goals are reviewed, this part of the County's statement is simply not true.

**Housing** – The Staff Report states that the GMA goal for Housing includes “*Encourage the availability of affordable housing to all economic segments of the population of the state...*” However, as determined by the studies referenced in Attachment A to this letter, allowing a high percentage of the housing stock to become STRs, as is the case in the Lake Chelan Valley, causes housing affordability to decline, pushing out mid- and low-income long-term residents from an area. This issue has become of paramount importance to the residents of the Lake Chelan Valley, and allowing an unrestricted and ever-increasing percentage of the housing stock to become STRs has exacerbated this issue. Clearly, this GMA goal is not being met by the proposed code amendments.

**Economic Development** – The Staff Report states that the GMA goal for Economic Development includes encouraging and expanding growth “...*all within the capacities of the state's natural resources, public services, and public facilities.*” However, as described in Attachment A, the unrestricted and ever-increasing growth in STRs in the Lake Chelan Valley has overwhelmed the area in terms of traffic capacity, available services, and public access to Lake Chelan. Clearly, this GMA goal is not being met by the proposed code amendments.

This makes the County's Suggested Findings of Fact that “*The amendments are consistent with Chelan County Code Title 14 Development Permit Procedures and Administration.*” at least partially untrue.

#### **4. Summary**

The Title 11 code amendments proposed by Chelan County are insufficient to properly regulate STRs and restrain the increasingly negative impact that STRs are having on the Lake Chelan Valley. Again, having roughly 40 percent of the current housing stock in the Lake Chelan Valley in seasonal use is completely dysfunctional.

The GMA requires Chelan County to consider and address these negative impacts. STR owners will argue that limitations on where STRs can be located and how many STRs are allowed restrict their property rights. However, as has been demonstrated by the actions taken by numerous other local governments:

- Equally important are the property rights of long-term residents that are already being infringed by STRs through the degradation of their quality of life (noise, traffic impacts, reduced access to public facilities, etc.).
- The entire community suffers from the impact of STRs when average workers can no longer afford to live in the area. STRs have been demonstrated in numerous studies to cause an increase in overall housing costs in contrast with GMA goals.
- Local governments have the legal right to enact these restrictions and the general public has been found to support them.

As noted above, the City of Chelan has put STR restrictions in place to protect city residents and it is well past time for Chelan County to do something similar.

In a perfect world it would be possible for property owners to rent out their housing units as STRs without adversely impacting others in the community; we do not live in this perfect world. Therefore, an equitable balance must be achieved as has been the goal of the other communities with STR regulations mentioned in this letter. What Chelan County has currently proposed leaves the equity balance in favor of STR owners (many of whom do not live in Chelan County) to the detriment of long-term residents. ***I therefore request that the comments I have provided be carefully considered and additional restrictions be placed on STRs in the Lake Chelan Valley as part of the proposed Title 11 code amendments (or other code amendments as applicable) to restore equity in our community.***<sup>3</sup>

Please feel free to contact me with any questions ([bcpatters@yahoo.com](mailto:bcpatters@yahoo.com)), and please keep me informed of any future public actions or correspondence related to the proposed amendments.

Thanks,



Brian Patterson, Ph.D.  
Environmental Scientist (retired)  
150 Kestrel Lane  
Manson, WA 98831

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<sup>3</sup> To reiterate, the majority of my comments apply to the Lake Chelan Valley, which is already heavily impacted by STRs due to the disproportionate impact of tourism in this area. If the County does not wish to apply the proposed STR restrictions County-wide, an STR overlay district could be created to define where additional STR restrictions apply.

## **Attachment A**

### **Short Term Rental White Paper**

# **Issues Associated with Short-Term Vacation Rentals in the Chelan Valley**

*prepared by Brian Patterson, Ph.D.; Manson, Washington; bcpatters@yahoo.com*

*April 16, 2018*

## **Executive Summary**

Short-term rentals (STRs) are a rapidly-growing segment of the housing inventory in the Chelan Valley, becoming a larger and larger fraction of housing in the region. Although STRs can benefit their owners and provide a boost to the local economy in terms of tourist dollars spent, there are a number of significant negative impacts that counter-balance these benefits that need to be considered.

Based on researching available literature and regulations, and in some cases personal anecdotal information where empirical data are not available, the following negative issues associated with STRs *as they pertain to the Chelan Valley* were identified:

- 1) STRs can destroy the character of residential neighborhoods by introducing unwelcome sources of noise, garbage, and excess vehicles, and reducing the sense of community that having long-term neighbors can bring about.
- 2) STRs can create an unfair advantage relative to established motels and hotels if they are not held to the same requirements to obtain business licenses and pay lodging taxes.
- 3) STRs are increasing peak tourist populations in the Chelan Valley, which will eventually overload existing infrastructure and recreational resources, significantly degrading the experience of living in, or visiting, the area.
- 4) STRs are increasing the cost of housing in the Chelan Valley.
- 5) STRs negatively affect the economic stability of the Chelan Valley.

This document does not address the impact of STRs outside of the Chelan Valley, where impacts could potentially be quite different.

Many local governments have identified some, or all, of the negative impacts listed above and have chosen to take regulatory steps to mitigate them. These steps have ranged from simply setting up new regulations and requiring permits to address residential community complaints and ensure payment of appropriate taxes (minimal mitigation) to banning STRs completely (maximum mitigation).

Impacts 1 and 2 above are fairly straightforward to understand and are commonly addressed by most local governments looking at the STR issue; as such, this document does not spend time looking at these impacts. Impacts 3 through 5, however, are often overlooked and are more difficult to understand. Therefore, much of this document is dedicated to further describing these impacts and how they might be mitigated.

## **1 Introduction**

This document has been created as an informational white paper for those government agencies tasked with looking at the issue of regulating short-term rentals (STRs) in the Chelan Valley in Washington State. Although many of the issues raised in this document are generally applicable to other areas, certain



features of the Chelan Valley cause STRs to have more of an impact than they might in other areas. As such, the approach to addressing STRs in other areas may be significantly different to that needed for the Chelan Valley.

As a resident of the Chelan Valley, I have seen explosive growth in new home construction since moving here in 2014. Along with this, I have seen the cost of housing also increase rapidly and have observed the numerous articles and discussions about how lower- and middle-class people are being forced out of the local housing market due to cost. As both Chelan County and the City of Chelan have started taking a look at how STRs might be affecting the affordable housing crisis, I decided to conduct my own review of how STRs (as defined in Section 2 below) are impacting my community more generally. This document is the outcome of that research.

It must be acknowledged that STRs in the Chelan Valley can have certain positive effects for some individuals, first and foremost those who directly profit from them (STR owners). Additionally, by bringing more tourists into the Chelan Valley than might otherwise be accommodated, STRs can benefit local businesses by providing more customers. And stronger, more viable, businesses can also benefit local residents by ensuring that these services continue to be available. Most people can easily recognize these benefits, and the people who benefit, but it is often more difficult for decision-makers to identify some of the negative impacts associated with STRs; therefore, this document attempts to enumerate those negative impacts that are sometimes more difficult to identify resulting from STRs in the Chelan Valley to hopefully ensure that they are not overlooked when evaluating the overall pros and cons of STRs.

## 2 Defining the Issue

For purposes of this discussion, STRs are defined as housing units that are rented out for less than 30-day periods (typically to tourists visiting the Chelan Valley) that could otherwise potentially be used as long-term residential homes (occupied by owners or renters). This would not include rooms within owner-occupied homes or accessory dwelling units where the principal home is owner occupied. This also does not include hotels, bed and breakfast units, or condominiums that are part of a larger complex that was built specifically as vacation rentals.

In many cases these are investment homes purchased or built specifically for short-term rental to tourists, sometimes with the idea that the owner might visit a few weeks out of the year.

## 3 Impact of STRs on Chelan Valley Peak Tourist Population Growth

### 3.1 *STRs Accelerate the Growth in the Inventory of Tourist Accommodations*

On one level it is obvious that allowing STRs will increase the inventory of tourist accommodations in areas where they are allowed, by converting existing housing units from long-term residential use to STRs. What may not be so obvious is the way that they greatly accelerate the growth in the inventory of tourist accommodations beyond what might otherwise be expected. The reason for this is that the economics of STRs stimulate the construction of new single-family units built primarily for STR use.

The Lookout development in Chelan provides a perfect example of how this happens. I believe that one of the most impactful decisions on the housing market made by the City of Chelan was to allow STRs in the Lookout development when it was approved by changing the zoning to Tourist Accommodation.

Allowing STRs at the Lookout completely changed the financial dynamics of selling and building homes there. Although the development was presented as being designed to have “a focus on walkability, shared spaces, and a connection with neighbors”, very few people buy homes in the Lookout to live there full-time. A quick look at the Vacation Rentals page on the Lookout website reveals that at least two-thirds of the homes currently purchased there are being used as STRs.

Being able to use homes at the Lookout as STRs allows many people who otherwise would not be able to purchase a second home to do so, since the high summertime rental rates (often \$3,000 a week or more) significantly offset the mortgage and insurance costs associated with owning a second home. For many people, the rental income generated by the home could offset most, or all, of the annual costs associated with owning it. Since those owners would then have a place for themselves to stay a few weeks a year, as well as the potential to benefit from increasing home prices, the incentive to purchase and build new homes in the Lookout is high.

But the side effect of this is to increase the availability of tourist accommodation in the Chelan Valley in a way that otherwise would not have occurred. If STRs had not been allowed at the Lookout, it is clear that only a fraction of the number of homes currently sold and built would have occurred (probably less than half), and the growth in tourist accommodations in the area would occur at a more manageable rate. And this impact will be felt for years to come; the 2017 Chelan Comprehensive Plan notes that the Lookout has been approved for approximately 487 dwelling units, of which less than 20 percent have thus far been constructed.

### *3.2 Increasing the Inventory of Tourist Accommodations Diminishes the Chelan Valley Experience*

Because they do increase the growth in tourist accommodations, as discussed in Section 3.1 above, they will also increase the growth of the tourist population (“If you build it, they will come.”). The resulting impact of the excess growth in tourism due to STRs on the Chelan Valley experience is one that is often overlooked or underappreciated. This is an impact that is greatly influenced by some of the unique aspects of the Chelan Valley which limit the ability of the area to absorb greater and greater numbers of tourists. The reason that the maximum number of tourists is the focus of this part of the discussion, rather than the number of residents, is because tourists dominate the peak population of the Chelan Valley; for example, the 2017 Chelan Comprehensive Plan estimates that during peak summer periods the number of tourists in the Chelan area exceeds the number of residents by at least a factor of four.<sup>1</sup> In addition, tourists are more impactful to local infrastructure on a per capita basis than are residents as will be discussed further in this document in Section 6.2.

The Chelan Valley has several unique features that limit its ability to accommodate ever-increasing numbers of tourists. Some of these features are geographical; for instance, the terrain elevation rises steeply from the shoreline around Lake Chelan, generally constraining major thoroughfares to pathways near the lake or through the few valleys or coulees radiating out from the shoreline. Building a new highway out from the city of Chelan, for example, is hindered by the surrounding hills.

Highway 150 between Chelan and Manson (separated by about seven miles) is constrained to the shoreline, in particular around Rocky Point, where the two-lane highway is tightly sandwiched between

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<sup>1</sup> The 2017 Chelan Comprehensive plan notes that “The City serves a permanent population of between 4,000-5,000, but a seasonal population of 25,000 in peak summer months.”

the lake and steep rocky cliffs; there is no feasible way this highway could be expanded with additional lanes in the future. An alternate route between Chelan and Manson does not currently exist, and building one in the future would require going over steep hills and traversing a large number of privately-owned properties. This highway is already significantly congested in the summer months and will only become more so as additional developments near the highway (such as the Lookout) are built out.

Traffic around the Chelan Valley is already becoming problematic during the peak summer months as demonstrated by increasingly longer lines behind intersections. Although the 2017 Chelan Comprehensive Plan proports to assess both current and projected (2037) traffic impacts at key intersections, this assessment was fatally flawed and is expected to severely underestimate actual anticipated traffic impacts (see Attachment A for a detailed discussion of this issue).

Another issue relates to public access to Lake Chelan. Both tourists and residents desire access to the lake for both swimming and boating, especially during the summer months. However, the vast majority of the lake shoreline is privately owned, with only a few public parks and boat launches available. All of these facilities are already packed during peak periods, and there are no identified options to build new facilities due to the shortage of available land to dedicate to new parks or boat launches.

The bottom line is that between the limitations of major roadways and lake access, the Chelan Valley is already nearing its capacity to handle tourists (“*Tourist Capacity*”) without severely impacting the enjoyment experienced by both residents and tourists during the peak season. Specific examples demonstrating the strains on local infrastructure in the Chelan Valley during the peak tourist season include:

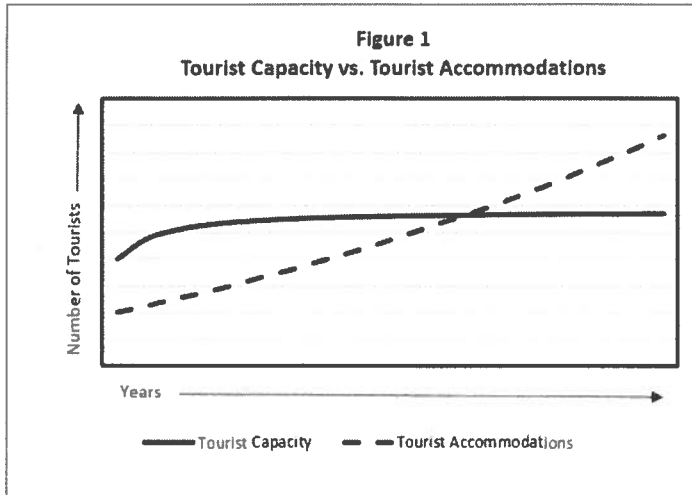
- Boat launches in Chelan (Lakeshore Marina) and Manson (Old Mill Park) often exceed capacity during summer weekends/holidays, with no remaining parking spaces for boat trailers.
- Swim areas in Chelan (Lakeside, Don Morse Park) often exceed parking capacity during summer weekends/holidays, with no remaining parking spaces.
- Downtown Chelan often runs out of available parking spaces during summer weekends/holidays.
- Restaurants in Chelan and Manson often have wait times exceeding one hour during summer weekends/holidays.
- Traffic backs up on Wapato Lake Road in Manson behind the stop sign waiting to get onto Highway 150, often causing delays of two or more minutes just to get on the highway.

These issues negatively affect tourists and residents alike.

Although no government agency has commissioned a study to determine the reasonable peak capacity of tourists (and how this is affected by the ever-increasing full-time residential population), one can easily understand that if the growth in the number of tourists visiting the Chelan Valley each year continues unchecked, and the infrastructure cannot be expanded at the same rate, the capacity of the region will eventually be exceeded. This will lead to traffic jams, parking issues, and an inability for some people to access the lake; in other words, unhappy residents and tourists.

Where do STRs fit into this? STRs increase the total number of accommodations available to house tourists (“*Tourist Accommodations*”). Assuming that the overall state and/or national economy is doing well, the *peak* number tourists anticipated will be roughly equal to the number of accommodations for tourists. So the growth in the number of tourists will follow the growth in tourist accommodations.

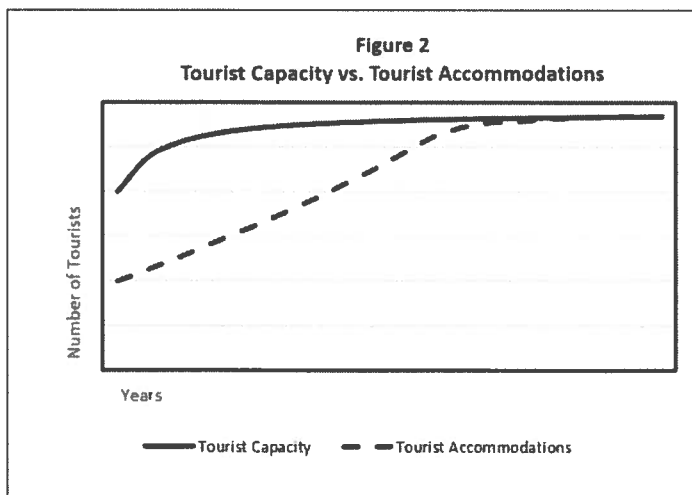
If one imagines that only limited increases to the Tourist Capacity of the Chelan Valley can be implemented due to the constraints discussed above, and the growth in Tourist Accommodations continues unabated, at some point the number of tourists will exceed the capacity of the region to adequately handle them, as represented in Figure 1.



Clearly, if Tourist Accommodations are allowed to exceed the Tourist Capacity of the area to handle the needs of the tourists, both tourists and residents will suffer from a poor experience. And attempts to reduce Tourist Accommodations once capacity has been exceeded will be very painful, as it will become necessary to remove Tourist Accommodations from the market after the fact, causing conflict with those who own and rent those accommodations.

An example of removing Tourist Accommodations might be to reduce the

number of single-family homes that can be used at STRs. This has already occurred at a number of coastal towns in Oregon, and in each instance it has caused conflict between the city government and the owners of the STRs. It is much better to anticipate the overcapacity issues well ahead of time – this reduces both the potential conflicts with homeowners wanting to use their homes as STRs, and it reduces the need for both tourists and residents to suffer through the negative experience that results from reaching overcapacity. This preferred pathway for the growth in Tourist Accommodations is represented in Figure 2.



But creating a tourist accommodation path similar to Figure 2 instead of Figure 1 takes proactive planning on the part of local government.

Unfortunately, unconstrained market forces will trend toward the outcome that is most profitable for entrepreneurs in the short-term, which is much more likely to look like Figure 1 than Figure 2. If local government is able to react quickly enough, the conflict with property owners can be minimized. Again, it is much more painful to take away the unlimited right to have STRs after it is being utilized than before the

investment has been made and the right is being utilized.

In summary, it needs to be acknowledged that the Chelan Valley has a natural maximum capacity for the number of tourists that can be supported without creating a miserable experience for both local residents and the tourists themselves. Although studies have not been conducted to determine roughly what that

capacity might be, anecdotal evidence points to the fact that we are probably closer to that capacity now than many might want to admit. Allowing the Chelan Valley to exceed this capacity through the unconstrained growth in tourist accommodations would be a dereliction of duty on the part of city and county governments. Therefore, immediate further investigation of this issue is warranted.

## 4 Impact of STRs on Residential Housing Affordability

### 4.1 STRs Increase the Cost of Existing Housing

The impact of STRs on affordable housing is one of the key issues the many local governments have focused on more recently when deciding to impose new regulations. The impact of STRs on affordable housing varies depending on the specific conditions of the area, but in cases when affordable housing is otherwise scarce, and the profitability of STRs is relatively high, (as is the case in the Chelan Valley) most studies have determined that STRs can reduce the availability of affordable housing.

The potential for STRs to impact affordable residential housing is fairly straightforward. If a particular housing unit can generate more profit per year being rented out to tourists as an STR than it can being rented out as a long-term residence, the owner is more likely to use it as an STR. Additionally, the ability to generate more profit as an STR causes the value of the housing unit itself to increase (rental housing is typically valued at a multiple of the annual revenue it can generate). As a result, the housing unit becomes both unavailable for use as a long-term residence and is more expensive if the current owner decides to sell. This by default reduces the stock of affordable housing for rent and for purchase.

This issue was clearly defined in the 2017 Chelan Comprehensive Plan, which states:

*“The City also faces affordability challenges since almost one-quarter of homeowners and renters are considered housing cost burdened, spending more than 30% of their income on housing. Today, Chelan’s housing pattern is largely single-family.*

*Additionally, the City has a large percentage of seasonal and second homes that has continually increased over the past decades. This has put strain on the existing housing stock to meet the needs of the year-round population while also accommodating the market demand for second homes. More rental housing and a variety of housing types are needed to address affordability issues and the needs of its residents.*

In fact, the 2017 Chelan Comprehensive Plan points out that the percentage of homes that are considered “seasonal” has increased steadily from 5.2 percent in 1980 to 32 percent in 2014, climbing at a rate of about eight percent per decade. Many of these seasonal homes are used as STRs and are therefore not available for use as long-term residential rentals; this implies that STRs are becoming a larger and larger percentage of the local housing inventory.

As things currently stand, the 2017 Chelan Comprehensive Plan notes that going forward “...the continued demand for seasonal housing is likely to blunt the market’s response to the needs of full-time residents—especially those whose earnings fall below the median.”

Unfortunately, the 2017 Chelan Comprehensive Plan stops short of proposing that the issue of STRs be further addressed and, if appropriate, mitigated through additional regulation.

Other studies have similarly concluded that STRs can cause a decrease in affordable housing. A study of Oregon STRs notes the impact of STRs on affordable housing and a number of other relevant conclusions, stating:<sup>2</sup>

*“For most case study cities, data suggests that STRs are constraining the supply of long-term housing.”*

*“In case study cities, STR growth is increasing at a faster rate than total housing units are.”*

*“Property owners in resort communities can generate more annual revenue off STRs than they can off standard long-term rental units.”*

*“For communities with affordable housing issues, higher fees for STRs in accessory/secondary dwelling units may incentivize property owners to use that valuable space for full-time residents as opposed to visitors.”*

In a white paper looking at four cities in Colorado, with populations under 7,000, it was found that STRs did lead to the reduction of homes and bedrooms previously used by employees, decreasing the supply of workforce housing.<sup>3</sup>

Numerous other studies have found that STRs increase the value of homes, thus making housing less affordable.<sup>4</sup>

In large metropolitan areas with large, diverse housing markets, the impact of STRs is less clear and sometimes found to be minimal.<sup>5</sup> But as noted above, in smaller tourist-oriented towns, the impact of STRs on the affordability of long-term residential housing (both for rent or purchase) is nearly always found to be negative.

#### **4.2 STRs Increase the Cost to Build New Housing**

The enticing financial dynamic of allowing new single-family home STRs has had a profound effect on the cost to build new housing, including affordable housing, in the Chelan Valley. Again, as noted in Section 3.1 above, the Lookout development provides a perfect example of how STRs impact the Chelan Valley. Because of the potential for significant rental income at the Lookout, they have been able to sell new homes in that development for \$300 to \$400 a square foot (and even higher prices are being asked in some cases currently), despite often having no garage and extremely small lots. Very few people would pay these prices if it was not for the potential of offsetting STR income.

Because of these high selling prices, the Lookout has been able to pay a premium for contractor services in order to fulfill the demand for new houses there. This has in turn driven up the cost to build a new house anywhere in the Chelan Valley due to the competition for limited contractor resources. Demand

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<sup>2</sup> *Assessing and Responding to Short-Term Rentals in Oregon*, University of Oregon, [https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/22520/DiNatale\\_final\\_project\\_2017.pdf?sequence=3#page23](https://scholarsbank.uoregon.edu/xmlui/bitstream/handle/1794/22520/DiNatale_final_project_2017.pdf?sequence=3#page23)

<sup>3</sup> *White Paper - Short-Term Vacation Home Rentals Impacts on Workforce Housing in Breckenridge*, Rees Consulting Inc., June 2016.

<sup>4</sup> For example, *Can Short-Term Rental Arrangements Increase Home Values? A Case for AirBNB and Other Home Sharing Arrangements*, Cornell University, June 2015.

<sup>5</sup> *Housing Affordability Impacts of Homeaway in Seattle*, ECONorthwest, July 2016.

for contractors is currently so high that it is often impossible to get contractors to return phone calls for new work on other projects.

Anecdotally, I have heard of several examples of people building new homes specifically to use them as STRs. This activity only further increases the price to build a new home, working against any efforts to increase the inventory of affordable housing in the Chelan Valley.

When my wife and I first started inquiring with builders in 2013 about building our house in Manson, there were homes in the area being built for \$100 per square foot (in 2013 the Lake Chelan Construction Company advertised on their web site that the cost to build a low-end home was \$85 per square foot).

Currently, the cost to build a modest home in Manson by one of the larger, more efficient builders runs closer to \$150 per square foot,<sup>6</sup> nearly a 50 percent increase in five years. Most smaller builders charge significantly more than \$150 per square foot (we know several people currently having new homes built). This means that the cost to build a modest 1,500 square foot home is about \$225,000, and this does not include the cost of the land, landscaping, or additional developer profit, which would bring the cost of such a home close to \$300,000. No wonder there are so few affordable single-family homes in the Chelan Valley.

Nationally, the average cost to build a new home actually decreased from \$89 per square foot in 2013 to \$86 per square foot in 2017, according to data from the National Association of Home Builders (NAHB) (2017 is the last year for which the NAHB provides data).<sup>7</sup> So while the cost to build a home in the Chelan Valley was only slightly higher than the national average in 2013, due to unprecedented growth in the cost of construction in this area, it now greatly exceeds the national average.<sup>8</sup>

And as discussed above, at least part of the reason for this rapidly increasing cost can reasonably be blamed on allowing newly-constructed homes to be used as STRs, as this has significantly increased the demand for new home construction in the Chelan Valley. It's a simple supply and demand dynamic.

## 5 Impact of STRs on Chelan Valley Economic Stability

STRs negatively impact the *economic stability* of the Chelan Valley in two different ways: 1) they increase the seasonality of economic activity in the area, and 2) they increase the negative consequences of a wider economic downturn.

### 5.1 STRs Increase the Seasonality of the Local Economy

One issue that local businesses have fought for years in the Chelan Valley is the seasonality of the “tourist economy”. New businesses open up to serve the massive tourist population during the summer months only to find out they cannot survive the slower winter months. This is an issue largely absent from non-tourist-based economies.

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<sup>6</sup> Based on conversations with a builder and a local realtor.

<sup>7</sup> Based on the average cost to build of \$246,453 and average house size of 2,607 square feet in 2013 and \$237,760 and 2,776 square feet in 2017; see *Cost of Constructing a New Home* dated December 1, 2017 at [http://www.nahbclassic.org/reference\\_list.aspx?sectionID=734&channelID=311](http://www.nahbclassic.org/reference_list.aspx?sectionID=734&channelID=311).

<sup>8</sup> In the last year, wood building material prices have also increased significantly, adding to the cost to build. However, the cost of wood building materials is only a relatively small fraction of the overall cost to build a home.



STRs increase summertime tourist accommodations, and therefore, increase the maximum summertime tourist population in the summer months. This only exacerbates the differential between the summer and winter total populations available to businesses. In contrast, a relative increase in the full-time residential population would help smooth out the variability in population in the Valley and make it easier for businesses to scale appropriately to serve the local population year-round while remaining profitable.

## 5.2 STRs Make the Local Economy Less Stable in an Economic Downturn

As was bourn out by the most recent recession that started in 2007, consumer expenditures on travel and tourism are particularly sensitive to economic downturns.<sup>9</sup> For a tourist-based economy, the impact from an economic downturn is two-fold; first, each consumer spends less, and second, there are fewer consumers available to spend. Non-tourist economies only have to deal with the first issue.

Since STRs increase the tourist population, and thus the reliance on tourist dollars, the local economy becomes more sensitive to economic downturns than it would be if local populations were comprised of a greater percentage of full-time residents. Alternatively, increasing local affordable housing would increase the percentage of the local population that are full-time residents, keeping the number of local consumers more stable during economic downturns.

## 6 How STR Impacts Could Be Mitigated

### 6.1 The Need to Mitigate Impacts

This document lays out a number of adverse impacts that STRs are having in the Chelan Valley. Although the impacts listed are discussed with the specific attributes of the Chelan Valley in mind, most of them are generally applicable to many areas in the U.S. and even other countries. And many local governments have developed regulations to address them. The Municipal Research and Services Center (MRSC) has a nice summary of the issues associated with STRs, and how 12 example municipalities have addressed them, on their website.<sup>10</sup> This summary includes the following:

*Most local governments' concerns about short-term rentals fall into at least one of the following categories:*

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

*Another issue of increasing concern is the impact of short-term rentals on a community's affordable housing supply. In this case, the concern isn't necessarily about a homeowner renting out a room or backyard cottage to help with monthly mortgage payments. Instead, local governments fear that*

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<sup>9</sup> *Travel expenditures, 2005–2011: spending slows during recent recession*, Bureau of Labor Statistics, December 2012, <https://www.bls.gov/opub/btn/volume-1/travel-expenditures-2005-2011-spending-slows-during-recent-recession.htm>.

<sup>10</sup> *12 Examples of Short-Term Vacation Rental Regulations*, MRSC, <http://mrsc.org/Home/Stay-Informed/MRSC-Insight/November-2017/Short-Term-Vacation-Rental-Sample-Regulations.aspx>.

*property owners will purchase residential units and rent them out on a short-term basis to out-of-town visitors, thereby taking them out of the year-round rental housing supply.*

This summary supports and supplements many of the discussions in this document.

## **6.2 The Right to Mitigate STR Impacts**

Before jumping into potential mitigation measures, I acknowledge that one might fundamentally argue that all property owners should have the right to rent out their property as they please as long as it does not conflict with current zoning laws. After all, they are paying property taxes, supporting infrastructure by doing so, and contributing to the local economy by bringing in tourists.

The problem with this is that their right to make money should not supersede the right of the local government to plan for the future of the community (for example, to manage growth) and the right of permanent residents to enjoy the experience of living in the area and making their own contributions to the community. Local governments place restrictions on land use all the time through zoning and ordinances, and sometimes these restrictions change for property owners even after they have purchased their property.

Also, it can be argued that owners of STRs are utilizing more than their fair share of public resources for personal financial gain. On a per-capita basis, tourists are high-impact users of roads (contributing disproportionately to traffic problems), lake access (causing overcrowding of beaches, boat launches, and the lake itself), sanitation services, and law enforcement. Unlike local residents, tourists generally do not volunteer time to aid the community, donate money to local projects, or treat natural resources with the same care and concern that local residents do.

Of note, the legal right of local governments to regulate STRs has been consistently supported.<sup>11</sup>

## **6.3 Minimum Requirements**

Most people agree that STRs should be subject to minimum requirements that are so obvious that this white paper does not contain sections discussing the negative impacts that would result if these minimum requirements were not put in place. The vast majority of local governments that have identified STRs as an issue have enacted these minimum requirements in some way.

The first of these minimum requirements is to put an STR permitting and registration system in place. This is the only way to ensure that STRs are identified and that they are paying the proper taxes to put them on a level playing field with local hotels, condo-tels, bed and breakfasts, etc. Such a permitting and registration system is currently being implemented within the Manson Urban Growth Area within Chelan County. The other piece to this needs to be appropriate enforcement mechanisms, which are often not adequate; this may require hiring one or more STR enforcement persons funded by the STR permit fees collected.

The other minimum requirement is to ensure that STRs do not adversely impact residential communities. This includes noise, parking, and sanitation. In most cases, this includes not allowing STRs in most

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<sup>11</sup> The City of Leavenworth commissioned a helpful legal analysis of the regulation of STRs in 2016: <http://cityofleavenworth.com/col-assets/uploads/2011/09/Memo-Info-Short-Term-less-than-30-day-Rentals-1-of-2.pdf>.

residential areas, often tied back to zoning designations and allowed uses, and creating a mechanism to handle complaints.

#### **6.4 Further Mitigation Measures**

Some local governments have addressed the STR issue only to the level of the minimum mitigation requirements outlined in Section 6.3 above. In effect, they have decided that there is no need to slow down the growth of STRs in their region. However, many other local governments have identified the unlimited growth of STRs as having a negative impact in one or more ways to their community. It is not the purpose of this white paper to identify every one of these communities or describe every mitigation measure taken. Rather, I will provide further information about how a couple of communities that seem relevant to the Chelan Valley in Washington and a couple of similar communities in Oregon have chosen to slow the growth of STRs, and why they chose to do so (to the extent that they have identified their rationale).

##### Walla Walla, Washington

Similar in some ways to the Chelan Valley, Walla Walla has a rapidly-expanding agritourism economy which depends on local agricultural workers to be sustainable.

In November 2017, Walla Walla enacted a new ordinance regulating STRs (Ordinance No. 2017-33). Under this ordinance, STRs (i.e., short-term rental of non-owner-occupied residential dwelling units) ***are banned, except for those “grandfathered” in***, meaning those STRs legally established prior to November 9, 2017. If a grandfathered STR is not used for at least 29 days in a year, or is otherwise discontinued or abandoned, it cannot be renewed (i.e., over time the number of permits will trend to zero). The grandfathered STRs are considered a non-conforming use and are subject to licensing and health and safety requirements.

In justifying the need for the new ordinance, the Walla Walla City Council stated the following:

- A. Non-owner occupied short term rentals have been the source of noise and other impacts that have adversely affected Walla Walla’s residential neighborhoods.*
- B. Non-owner occupied short term rentals damage the quality of Walla Walla neighborhoods and the family friendly atmosphere that they seek to promote.*
- C. Non-owner occupied short term rentals frustrate the effectiveness of block watch programs and they reduce community safety provided by strong neighborhoods.*
- D. Non-owner occupied short term rentals burden public safety response by impairing the ability of responders to contact and personally address crises and concerns while they are ongoing.*
- E. Streets in Walla Walla’s residential neighborhoods cannot adequately absorb the additional traffic congestion and parking needs created by short term rentals.*
- F. Non-owner occupied short term rentals adversely impact the City of Walla Walla’s ability to analyze its capacity to absorb population increases and negatively affects the reliability of its GMA required buildable lands analysis.*

##### Leavenworth, Washington

Similar to the Chelan Valley, Leavenworth has an economy that relies heavily on tourism.

Leavenworth, Washington , through its zoning laws in Chapters 18.20 through 18.24, **completely bans** STRs (defined as “transient accommodations”) within city limits. This ban has been in place since 1998.

At the time, this ban was enacted to address issues associated with the disruption caused by having short-term rentals in residential neighborhoods. Because this ban has been in place for so long, it is unclear if it was intended to address other issues. The ban was re-examined in 2016, and the City determined that the ban was legal, appropriate, and should be kept in place.

#### Cannon Beach, Oregon

Cannon Beach is a small town located on the Oregon coast and, similar to the Chelan Valley, has an economy that relies heavily on tourism.

In 2004, Cannon Beach adopted a new ordinance to regulate STRs (Ordinance 04-09A). This ordinance **limited the number** of STRs in the city to a total of 92. Some grandfathered STRs have lifetime permits, while newer permits are assigned by lottery and expire after five years; permit holders with expired permits must then re-enter the lottery (after skipping one lottery cycle). Five-year permits cost \$275 to obtain. Additionally, anyone may apply for and obtain a permit to rent their home for one rental period up to 14 days in a given year. Permittees must comply with a list of physical and health and safety requirements.

The Cannon Beach STR regulations state that “*The purpose of this chapter is to protect the character of the city’s residential neighborhoods by limiting and regulating the short-term rental of dwelling units.*”

#### Gearhart, Oregon

Gearhart is a small town located on the Oregon coast and, similar to the Chelan Valley, has an economy that relies heavily on tourism.

In 2016 Gearhart enacted a new ordinance to regulate STRs (Ordinance No. 901). This ordinance **banned** all STRs in areas zoned as low- or medium-density residential. In high-density residential areas, the city allowed a **one-time**, 60-day period, when property owners could apply for an STR permit. Those STRs must have a local representative available 24-hours a day within 30 minutes of the STR and meet a number of physical, and health and safety, requirements. Permits cost \$600 per year and are not available to subsequent owners of the home unless transferred by inheritance (i.e., over time the number of permits will trend to zero).

Some local residents objected to the ordinance and collected enough signatures to get a referendum on the ballot in November 2017 to overturn parts of the ordinance. However, the referendum was defeated by a vote of 23 percent for and 77 percent against, and the ordinance still stands.

The ordinance was created to address complaints from residents that STRs were ruining the character and livability of neighborhoods and causing parking issues.

## 7 Conclusions

There may be no one-size-fits-all set of solutions to address STRs in Chelan County. The impact of STRs in some areas of the County may be minimal, and it is possible that different STR regulations are appropriate for different areas within the County.

This white paper addresses issues that are specific to the Chelan Valley within the County (particularly the Chelan and Manson areas). Within the Chelan Valley, STR regulations in both the City of Chelan and

the unincorporated areas within the purview of the County are necessarily intertwined. In many ways they utilize the same housing market, rely on the same transportation system, and share the same natural resources (e.g., Lake Chelan). For this reason, this document is being shared with both City of Chelan and Chelan County.

***Given the high susceptibility of the Chelan Valley to negative impacts from STRs, it seems unlikely that these impacts will be adequately addressed without regulations that put some kind of constraint on the growth of STRs. This could be accomplished by removing the profit motive through the implementation of fees or by instituting a ban on, or limitation on the number of, STRs allowed in the area as has been instituted by other local governments. Addressing this issue sooner rather than later will make mitigation much less painful to all parties involved (STR owners, residents, and tourists).***

It is hoped that the information in this white paper will be useful for the County and City governmental agencies contemplating the impacts of STRs in the Chelan Valley and how those impacts could be mitigated. Please address any questions or comments on this document to Brian Patterson at [bcpatters@yahoo.com](mailto:bcpatters@yahoo.com).

## **Attachment A**

### **How Chelan Has Underestimated Future Traffic Impacts**

In the 2017 update to the Chelan Comprehensive Plan (Comp Plan), an assessment of the 2017 and estimated 2037 traffic impacts was conducted. The conclusion of the analysis was that two intersections in Chelan would fall to an unacceptable level of service (LOS) by 2037, but that improvements could be made to bring them up to acceptable levels in the future. However, the traffic assessment conducted severely underestimated traffic impacts for two important reasons:

- 1) The baseline traffic volumes for 2017 significantly underestimated peak traffic volumes.
- 2) The baseline 2017 traffic volumes were increased for 2037 using a growth rate much too low to account for future increases in tourist traffic.

The combined effect of these two errors is that the reported 2037 traffic impacts are severely under-reported.

### Baseline Traffic Volumes

The baseline 2017 traffic volumes were based on traffic counts collected in May of 2009. These May traffic counts were used to represent “peak” traffic volumes for Chelan in 2017, ignoring the fact that tourist volumes in May are significantly lower than they are in July and August and that during the summer month tourists significantly outnumber permanent residents.<sup>12</sup>

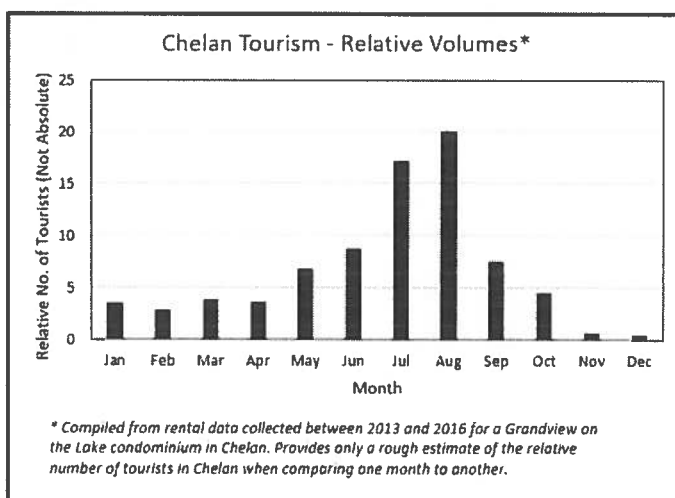
In the 2016 Annual Traffic Report compiled by WSDOT, appropriate scaling factors for Rural Central Mountain communities with a Strong Recreational Influence (factor group GR-09) are provided. Graphical data indicate that the traffic volume ratio between May and summer months is the reciprocal of approximately 1.3 divided by 0.85, or about 1:1.5. This suggests that May traffic counts should have been increased by at least 50 percent to represent peak traffic counts.

Some data suggest that summertime peak traffic volumes in Chelan are even more than 50 percent higher than May traffic volumes. Vacation rental data shown in the figure below indicates that August tourist volumes could be over 150 percent higher than May tourist volumes. If tourists make up 80 percent of

the number of people in Chelan in the summer (see footnote 1), then summertime traffic volumes could be roughly double those in May.<sup>13</sup>

Clearly the use of May traffic counts in the Comp Plan traffic assessment was inappropriate, and those volumes should have been increased by 50 to 100 percent to assess the traffic impacts at critical intersections during peak periods.

By not doing so, the baseline 2017 traffic counts, and resulting modeled impacts, are much too low.



<sup>12</sup> The 2017 Chelan Comprehensive Plan notes that “The City serves a permanent population of between 4,000-5,000, but a seasonal population of 25,000 in peak summer months.”

<sup>13</sup> 80% of the peak population (seasonal tourist proportion) increased 150% + 20% of the peak population (non-seasonal resident proportion) not increased implies 120% growth, or more than double.



### 2017 to 2037 Traffic Growth Rates

The traffic assessment in the 2017 Comp Plan assumed that traffic volumes in the Chelan area would grow at an annual rate of about 2.0 percent between 2017 and 2037. This growth rate was used in conjunction with the (erroneous, see above) 2017 baseline traffic volumes to arrive at estimated 2037 traffic volumes.

However, this conflicts with data provided in the 2017 Comp Plan. Exhibit 3-5 in Appendix A to the Comp Plan (Capital Facilities Plan) and surrounding text indicates that the Chelan peak seasonal (tourist) populations are growing at an annual rate of 4.9 percent per year and that the seasonal population accounts for at least 66 percent of the total population of Chelan in the summer months (with the remaining 34 percent being comprised of permanent residents). The Comp Plan indicates that the permanent resident population will grow at an annual 1.25 percent.

These data imply that the overall summertime population will grow at an annual rate of:

$$(66\% \times 4.9\%) + (34\% \times 1.25\%) = 3.7\%.$$

Since it is reasonable to assume that peak traffic volumes will increase proportional to the increase in the total summertime population in Chelan, the Comp Plan traffic assessment should have assumed annual traffic volume growth of something near 3.7 percent between 2017 and 2037, nearly twice the rate of 2.0 percent actually assumed in the assessment.

Over the twenty-year assessment period between 2017 and 2037, an annual growth rate of 2.0 percent represents a total increase in existing traffic volumes of 48 percent; an annual growth rate of 3.7 percent represents a total increase of 107 percent. This is a significant difference!

### Conclusion

Taken together, the two errors noted above imply that the estimated 2037 traffic volumes should have been between 110 and 170 percent higher than those that were used in the 2017 Comp Plan. As a result, the reported LOS ratings for the intersections evaluated are significantly better than would result from an accurate assessment. It is therefore likely that actual traffic impacts due to the growth in both the permanent and the peak tourist populations in Chelan will be much worse than currently anticipated, barring a significant economic downturn, making new efforts to control traffic volumes in the future (potentially by managing maximum tourist accommodations in the Chelan Valley) all that much more important.

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## Short Term Rentals

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**Brian Burnett** <Brian.Burnett@co.chelan.wa.us>  
To: nnewell@gmail.com <nnewell@gmail.com>

Tue, Jul 23, 11:34 AM

Nathan-

As a follow-up from our phone and meeting with your short term rental group last year in Leavenworth, I believe that there appears to be fewer complaints to our office or through RiverCOM local dispatch center against short-term renter than hotel guests in hotel facilities or long-term residents in Chelan County. Short-term residential disturbances on average can be easier to deal with by both law enforcement and property owners and managers compared to long-term residents. The land lord tenants laws in the state of Washington have a tendency to protect the renter making it much more difficult for the property owner or manager to deal with the issue at hand in an adequate or timely manner, outside of law enforcement issuing notice of infractions or criminal citations.

Additionally, if a short-term rental group is behaving in such a way which violates their contract to use the premises, Law enforcement can work with property owners and property managers to remove the short-term renters for trespass should the property owners or managers request such and under proper advisement to the short-term renters. Long-term renters must go through a much more lengthy eviction process. Law enforcement rarely needs to return to the location in order to rectify the complaint but long-term rentals can add the challenge of repeat offenses by the same persons residing at the rental location. Obviously not all complaints are the same in nature and can be difficult to track or put into anecdotal stats as complaints will come in the form of noise complaints from neighbors or disturbance calls due to disorderly, Domestic Violence or other miscellaneous natured calls warranting a response by Law Enforcement.

Sincerely,

Brian Burnett





July 23, 2019

Members of the Planning Commission

BNCW represents about 300 small businesses in the Chelan County area. We advocate for the protection of property rights, among many other small business concerns and we are interested in the proposed legislation regarding "short term rentals."

We believe there are a lot of issues that have not been given adequate attention and the consequences could be disastrous if not addressed.

First, we question the wisdom, as a public policy matter, of Chelan County getting involved in what are really issues between neighbors and suffering liability exposure as a result. Does the County **really** want to do this? Will the county become a party to litigation between neighbors? Or consider a scenario where someone is injured or killed due to faulty smoke alarms, or a fall due to non-compliant stairs or railings; while staying in a residence that the county has inspected and issued a short term rental permit for.

There are many more issues we feel need to be addressed:

1. How would these regulations work in certain UGA's such as Cashmere and Entiat? Would the City rules or County rules apply?
2. The State of Washington has already provided regulation of short term rentals via HB 1798 and codified in Chapter 64 RCW. These rules take effect on July 28 of this year, just 4 days from the hearing. These rules are quite a bit different than the rules proposed by Chelan County. Which rules will prevail?
3. What about SEPA? There is no specific exemption for these permits and it seems reasonable to ask if they would be exempt, and under what authority? If they are not SEPA-exempt, then each one effectively mandates a public process. The permit fees would also go up by the cost of SEPA review. Is that what the county has in mind?
4. Just what will the permit process look like? There are three levels of process for land-use permits: Limited Administrative Review, Full Administrative Review, and Quasi-Judicial review. The proposed code does not say which one applies. Shouldn't this be addressed?
5. What is the rationale for limiting STR's to 5 bedrooms? Is there some logical basis?
6. Are there any timelines for issuing a permit? If there are none, then the County presumably has at least 120 days to do so after determining the application is complete.

7. What are the criteria for issuing a permit? What are the criteria for denying a permit? There seems to be no guidance in the proposed legislation.
8. Will each home be inspected annually? Will the inspections be limited to "fire and life safety?" What if other code compliance issues are found during inspection?
9. We note that the 2019 budget includes \$750,000 for income from STR fees. We presume this is a \$500 fee for 1500 STR's. It's obvious that this will not be realized in 2019 since the legislation is still under consideration. More importantly, this represents around 6 or 7 full-time employees working exclusively on STR permits (not enforcement). Where will those people be found, and does the County have the infrastructure to support them? This represents around 24% of the Community Development budget – just less than revenue from building permits.
10. What about enforcement? The county is barred from using permit fees for enforcement (Clark County ended up with a \$1.2 million payback for doing exactly that) so where are the funds coming from to fund enforcement of those 1500 permits, and how many additional staff will that require? Seems like a reasonable question.

These seem to us to be legitimate concerns, but despite all of them the overriding question is "Does the County really want to take this on?" With all of the liability out there, we question the wisdom of becoming entangled in this issue at all.

Lee Pfluger

CEO, Building North Central Washington

Amy Gustin

Chairman, Building North Central Washington

July 24, 2019

**Public Hearing:**

"In regard to Code Development for the management of Short Term/Vacation rentals."

**Our names:**

Doug & Christi Lewis residing at 16750 Brown Rd. Leavenworth (Lake Wenatchee).

Though we appreciate the opportunity offered to 'outsiders' to come enjoy the amenities inherent in our communities, and we are grateful for the conditions being considered for the use of the facilities, our concern centers on the enforcement mechanisms for compliance.

Though there will be some easily monitored paperwork - applications, permits, fees paid etc. the most important item to neighbors is the adverse impact of excessive numbers.

**Our Experience:**

For the past 4 years we have lived as full time residents across the street from a facility used exclusively for night guests. The facility operation is governed by a 'conditional use permit' issued by Chelan County. The permit explicitly states that the overnight limit is not to exceed 12 guests.

However:

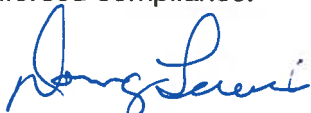
1. Their own website (printed 7/24/19) advertises for 20 plus guests- further tested with a reservation attempt asking for booking with over 20 and given assurance of the date - accepting reservation and moving us to give credit card information.
2. Post stay reviews from guests frequently note that their party was in excess of 20.
3. Visits with guests offering their party numbers well in excess of permitted limit of 12.
4. Visual evidence - cars and occupants in excess of 12 people with views at the going out of lights and still there as first light next day.

Upon repeated violations, the above evidence was presented to the Chelan County Planning enforcement staff in the form of phone calls, visits to the county office and written complaints. In addition, two petitions were signed and delivered by immediately adjacent property owners requesting the county to enforce the conditions required by the 'CUP' (Conditional Use Permit). All should be on file with Chelan County.

**Results:**

The county responded with two different letters to the owners stating the need to operate within the terms of their CUP or face fines. After a protest by the owners and after legal review by the county, we were notified by the county that our complaints simply were a matter of "he said, she said" with respect to evidence submitted, they could not act on the complaint and were closing the case. I then visited the county office and spoke to an enforcement staff asking what evidence would be acceptable for non compliance and was told, "I don't know".

These abuses put neighbors in the position of 'first line of defense' with no assurance of enforced compliance.



To: Chelan County Planning Commision

From: Bob Fallon

12275 Village View Drive

Leavenworth

[rfallon@icloud.com](mailto:rfallon@icloud.com)

509-548-4684

Comments on Short Term Rentals in Chelan County

I rise to decry the existence of short term home rentals in residential areas of Chelan County , especially where they are most dense, e.g. the upper Wenatchee Valley around Leavenworth. They disrupt communities, destroy neighborliness, distort housing prices, decrease the availability of housing for full time residents and impact traditional appropriately zoned, permitted, licensed and taxpaying options for visitor housing: resorts, inns, lodges, hotels, bed & breakfasts and short term rentals in commercial zones.

I will focus my remarks on the absurd notion that STRs should not or perhaps cannot be regulated, as said regulations would be a violation of "private property rights". The widespread existence of zoning regulations is a very persuasive argument that various uses of private property can indeed be limited.

In fact, Chelan County Zoning Code 11.88.230 limits Home Occupations. In light of that code I am a little puzzled about why we are having this conversation. It is hard to argue that a for profit operation in a building in a residential zone, permitted as a home, resembling a home and previously used as a home is not a home occupation.

I am distressed by the arrogance of short term rental operators that they not be regulated, permitted, licenced and taxed like every other property use in the county.

The Methow Valley and the cities of Leavenworth and Seattle have limited or banned STRs in residential areas. So restrictions can definitely be imposed. Chelan County did not shrink from restricting legal Marijuana grows that had been permitted and which tried mightily to work with neighbors and the county to continue their operations. Their restriction was imposed based on the complaints of neighbors in defiance of private property rights, and in a county that proudly fosters agrarian enterprises. So if citizens are offended by Short Term Rentals in residential areas I see no reason why they can't be banned.

The State legislature enacted a law that goes into effect in 3 days that requires registration, licensing and taxing of STRs and I strongly encourage Chelan County to vigorously join in that effort.

I urge the banning of STRs in residential areas of the county where the local residents feel it is a significant problem.

To: Chelan County Planning Commission  
From: Marty Fallon  
RE: Short Term Rentals – Public Comment  
Date: July 24, 2019

Thank you for a good start on trying to establish regulations for Short Term Rentals. I commend you on the 5-bedroom maximum stated in the draft.

I'd like to address some of the wording on Page 5, Lines 71-74:

Line 71 – I have an issue with “overnight guests” and think it should be changed to “No more than two guests per bedroom shall be accommodated at any one time.” With that one word “overnight” in place, a house can be secured for 10 guests but could entertain an unlimited number during the day and evening, say for a wedding, family reunion or just to party, using the house as an “event center”.

Line 74 – Change to state “A guest is a person of any age.” All registered guests should be counted.

At present, many Short Term Rentals have become “event centers”, disrupting residential neighborhoods. If my neighbors are planning a large gathering, they let their neighbors know in advance, forewarn about parking and noise, and we all realize it only happens once or twice a year. Short Term Rentals present these issues week-after-week, totally changing the concept and atmosphere of a residential neighborhood.

I'd like to add that there are commercial facilities in the area able to host large parties and events and eagerly want the business and are licensed to do so.

Marty Fallon  
12275 Village View Dr.  
Leavenworth, WA 98826



My name is Kathy Blum, 15 Helios Hills Lane, Manson, WA.

I am speaking on behalf of the Manson Community Council f which I am a member. We have also submitted a letter to Community Development with our detailed input.

We have 4 points to briefly make.

First, we ask that a moratorium be placed on all new vacation rental permits within the Manson UGA. Those that are legally permitted should be allowed to continue, those that are operating without permits should be immediately terminated until the moratorium is lifted. Our concern is the proposed draft code does not address density limits and we request further input into the code development. To date we have not been asked for agency comment.

Second, we strongly believe any code should address septic system issues. Many homes in Manson use these systems and we are concerned that they are being stressed beyond their permitted capacity. Many of our residents report septic system problems with vacation rentals due to their extreme overuse. The permitted size of the septic system should govern the capacity and they should be inspected once per year during the permit application process.

Third, we believe the code should require a traditional land-line telephone whose address is in the Rivercom database. Many areas of Manson do not have cellular service coverage, and this will insure vacationers to our area can be taken care of by emergency services should the need arise. Imagine a young child being the only one who can call 911 and either the cell phone doesn't connect or they have no idea where they are located!

Fourth, we believe the capacity limit for rentals on traditional sewer systems should be two people per bedroom plus two additional people and most importantly, children over the age to two should be counted in this capacity limit.

The Manon Community Council strongly desires to work with our county planners and commissioner in developing regulations that will benefit all parties. Thank you for your time.

Manson Community Council Members,

Kari Sorenson Chairman, Gordon Lester Vice Chairman, Cindy Smith Sec. Treasurer,  
Kathy Blum, and Open Position

# ***M*anson Community Council**

***"Building a better community, through our community!"***

Kirsten Larsen  
Planning Manager  
Chelan County Community Development  
316 Washington St, Suite 301  
Wenatchee WA 98801

Dear Ms. Larsen

Chelan County has proposed amendments to Chelan County Code (CCC) Titles 11 and 14 to address Short Term Rentals (STRs) in the County. These code amendments have been made available for written public comment up until the time of the associated public hearing on July 24, 2019 at 7PM. The Manson Community Council (MCC) held a public special meeting on July 22, 2019 at 6PM to gather input from Manson residents on this issue. Based on the input of MMC councilpersons and other Manson residents present at the July 22<sup>nd</sup> special meeting, the MCC has the following comments:

The MCC believes that the recent, rapid growth of STRs in the Manson area has adversely affected the quality of life for residential neighbors of STRs, the affordability of homes in the area for long-term residents, and local infrastructure (e.g., traffic, public access to Lake Chelan, availability of services, etc.). Most importantly the community of Manson wants to maintain the quality of life in neighborhoods that it has had for many years. The opportunity to save this is almost gone and the citizens of Manson request that Chelan County put in place appropriate regulations to bring back and maintain that quality of life.

Kirsten Larsen Since the STR situation has changed so quickly in such a short period of time, the MCC requests that Chelan County immediately issue a moratorium on new STRs in the Manson area. Although the MCC realizes that enforcement of such a moratorium might be difficult, it is believed that having a stated moratorium in place will slow down the growth of STRs until such time that a more comprehensive plan can be implemented through CCC amendments.

The MCC recommends that a code amendment be added to proposed section 11.93.380 which requires STR owners renting homes with a septic system to have that system inspected and certified by an inspector approved by the Chelan Douglas Health District on an annual basis. This would reduce the likelihood of a failure of the septic system which could negatively impact not only surrounding neighbors (e.g., odor issues), but also the health and safety of STR renters as well.

The MCC recommends that a code amendment be added to proposed section 11.93.380 which requires STR owners to have owned the home being proposed for use as an STR for at least one

# ***M*anson Community Council**

***"Building a better community, through our community!"***

year. This will help ensure that STR owners have lived in the area and have a more vested interest in the local community.

The MCC recommends that a code amendment be added to proposed section 11.93.380 which requires land line phones at every STR. Cell phone reception in many areas of Manson is spotty and could cause calls to 911 by STR renters in an emergency to be impossible to make. Manson has a volunteer fire department and needs requests for emergency service to be made as timely as possible, not after renters have had to drive around to attain an adequate cell phone signal.

The MCC finds that unregulated transient occupancy uses in residential areas present a threat to the public welfare relating to compatibility with residential uses and preservation of the character of the neighborhoods in which they are located. We strongly disagree with the Chelan County Staff Analysis; specifically, short term vacation rentals DO NOT encourage the availability of affordable housing to all economic segments within the Manson area.

Sincerely,

Kathy Blum  
Representative  
Manson Community Council

cc: David Kuhl

FW: note for hearing -- had wrong address

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From: Sue Fazio (hofffazio@comcast.net)

To: ourchelan@yahoo.com

Date: Tuesday, July 23, 2019, 9:11 AM PDT

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**From:** Sue Fazio <hofffazio@comcast.net>

**Sent:** Monday, July 22, 2019 6:02 PM

**To:** blum <ourchelan@yahoo.com>

**Subject:** note for hearing

We live at 205 Helios Hills Lane. Fred Hoff and Sue Falzio. We feel the rentals are not good for our neighborhood. There have been loud parties with many many people – these are people in your neighborhood that you don't even know which puts your home security at risk to some degree. One renter doesn't even have a buoy so her renters have tied up their boat to our neighborhood private neighborhood dock for periods of time. If the lake is rough they come knocking at our door for help as we are the first house to the left of the boat ramp. The owner has given her renters a key to the locked boat ramp which I feel should not be. I have called Vacasa in years past and promises made but nothing done. One renter doesn't have a buoy due to liability for her for renters. They drive down our small narrow road with their big boats and have broken off branches on some of my plants. They go down to the neighborhood dock late at night and make a lot of noise when the rental houses have a dock of their own. Real estate companies advertise community water access when access is limited to only those in Helios Hills. Code as I understand it is only enough people for a 2 bedroom septic but the rental/s have many more and advertise more bedrooms. . If they have a dog it then poops on our front lawn with no cleanup done by renters. They also don't realize there are children that play on this road and just simply go speeding by. There are a total of 13 people with a home in Helios Hills on Helios Hills Lane with two rentals. As Chelan grows this problem will only escalate so something needs to be done about this sometime soon. Possibly some kind of city ordinance with restrictions needs to be implemented.

I have talked with other people who live next to a rental as it has become a nightmare for them and their properties arent even right on the lake.

**SHB 1798 - S COMM AMD**

By Committee on Financial Institutions, Economic Development & Trade

**ADOPTED 04/11/2019**

Strike everything after the enacting clause and insert the following:

**"NEW SECTION. Sec. 1. DEFINITIONS.** The definitions in this section apply throughout this chapter unless the context clearly requires otherwise.

(1) "Contact" means the operator or the operator's representative who is the point of contact for any short-term rental guest for the duration of the guest's stay in the short-term rental.

(2) "Department" means the department of revenue.

(3) "Dwelling unit" means a residential dwelling of any type, including a single-family residence, apartment, condominium, cooperative unit, or room, in which a person may obtain living accommodations for less than thirty days, but not including duly licensed bed and breakfast, inn, hotel, motel, or timeshare property.

(4) "Fee" means remuneration or anything of economic value that is provided, promised, or donated primarily in exchange for services rendered.

(5) "Guest" means any person or persons renting a short-term rental unit.

(6) "Operator" or "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.

(7) "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.

(8) "Person" has the same meaning as provided in RCW 82.04.030.

1 (9)(a) "Short-term rental" means a lodging use, that is not a  
2 hotel or motel or bed and breakfast, in which a dwelling unit, or  
3 portion thereof, that is offered or provided to a guest by a short-  
4 term rental operator for a fee for fewer than thirty consecutive  
5 nights.

6 (b) "Short-term rental" does not include any of the following:

7 (i) A dwelling unit that is occupied by the owner for at least  
8 six months during the calendar year and in which fewer than three  
9 rooms are rented at any time;

10 (ii) A dwelling unit, or portion thereof, that is used by the  
11 same person for thirty or more consecutive nights; or

12 (iii) A dwelling unit, or portion thereof, that is operated by an  
13 organization or government entity that is registered as a charitable  
14 organization with the secretary of state, state of Washington, or is  
15 classified by the federal internal revenue service as a public  
16 charity or a private foundation, and provides temporary housing to  
17 individuals who are being treated for trauma, injury, or disease, or  
18 their family members.

19 (10) "Short-term rental advertisement" means any method of  
20 soliciting use of a dwelling unit for short-term rental purposes.

21 (11) "Short-term rental platform" or "platform" means a person  
22 that provides a means through which an operator may offer a dwelling  
23 unit, or portion thereof, for short-term rental use, and from which  
24 the person or entity financially benefits. Merely publishing a short-  
25 term rental advertisement for accommodations does not make the  
26 publisher a short-term rental platform.

27 NEW SECTION. **Sec. 2. TAXES.** Short-term rental operators must  
28 remit all applicable local, state, and federal taxes unless the  
29 platform does this on the operator's behalf. This includes occupancy,  
30 sales, lodging, and other taxes, fees, and assessments to which an  
31 owner or operator of a hotel or bed and breakfast is subject in the  
32 jurisdiction in which the short-term rental is located. If the short-  
33 term rental platform collects and remits an occupancy, sales,  
34 lodging, and other tax, fee, or assessment to which a short-term  
35 rental operator is subject on behalf of such operator, the platform  
36 must collect and remit such tax to the appropriate authorities.

1        NEW SECTION.    **Sec. 3.**    CONSUMER SAFETY. (1) All short-term rental  
2 operators who offer dwelling units, or portions thereof, for short-  
3 term rental use in the state of Washington must:

4        (a) Provide contact information to all short-term rental guests  
5 during a guest's stay. The contact must be available to respond to  
6 inquiries at the short-term rental during the length of stay;

7        (b) Provide that their short-term rental is in compliance with  
8 RCW 19.27.530 and any rules adopted by the state building code  
9 council regarding the installation of carbon monoxide alarms; and

10       (c) Post the following information in a conspicuous place within  
11 each dwelling unit used as a short-term rental:

12       (i) The short-term rental street address;

13       (ii) The emergency contact information for summoning police,  
14 fire, or emergency medical services;

15       (iii) The floor plan indicating fire exits and escape routes;

16       (iv) The maximum occupancy limits; and

17       (v) The contact information for the operator or designated  
18 contact.

19       (2) Short-term rental platforms must provide short-term rental  
20 operators with a summary of the consumer safety requirements in  
21 subsection (1) of this section.

22       (3) For a first violation of this section, the city or county  
23 attorney must issue a warning letter to the owner or operator. An  
24 owner that violates this section after receiving a warning letter is  
25 guilty of a class 2 civil infraction under chapter 7.80 RCW.

26       NEW SECTION.    **Sec. 4.**    SHORT-TERM RENTAL PLATFORMS. (1) No short-  
27 term rental platform may engage in the business in the state of  
28 Washington unless the short-term rental platform is in compliance  
29 with the requirements of this chapter.

30       (2) A short-term rental platform must register with the  
31 department.

32       (3) Short-term rental platforms must inform all operators who use  
33 the platform of the operator's responsibilities to collect and remit  
34 all applicable local, state, and federal taxes unless the platform  
35 does this on the operator's behalf.

36       (4) Short-term rental platforms must inform all operators who use  
37 the platform of short-term rental safety requirements required in  
38 this chapter.



1 (5) Short-term rental platforms must provide all operators who  
2 use the platform with written notice, delivered by mail or  
3 electronically, that the operator's personal insurance policy that  
4 covers their dwelling unit might not provide liability protection,  
5 defense costs, or first party coverage when their property is used  
6 for short-term rental stays.

7 NEW SECTION. **Sec. 5. LIABILITY INSURANCE.** A short-term rental  
8 operator must maintain primary liability insurance to cover the  
9 short-term rental dwelling unit in the aggregate of not less than one  
10 million dollars or conduct each short-term rental transaction through  
11 a platform that provides equal or greater primary liability insurance  
12 coverage. Nothing in this section prevents an operator or a platform  
13 from seeking contributions from any other insurer also providing  
14 primary liability insurance coverage for the short-term rental  
15 transaction to the extent of that insurer's primary liability  
16 coverage limits.

17 NEW SECTION. **Sec. 6.** Sections 1 through 5 of this act  
18 constitute a new chapter in Title 64 RCW."

**SHB 1798** - S COMM AMD

By Committee on Financial Institutions, Economic Development &  
Trade

**ADOPTED 04/11/2019**

19 On page 1, line 1 of the title, after "rentals;" strike the  
20 remainder of the title and insert "adding a new chapter to Title 64  
21 RCW; and prescribing penalties."

EFFECT: Requires short-term rental operators to maintain primary  
liability insurance of not less than one million dollars. Short-term  
rental platforms are required to provide all operators who use the  
platform with written notice, delivered by mail or electronically  
that an operator's personal insurance policy may not provide all  
protections needed to operate a short-term rental.

--- END ---

**DRAFT – SHORT TERM RENTAL CODE**

**1 Chelan County Code**

**2 11.04.020 District use chart.**

3 The use chart located on the following pages is made a part of this section. The  
4 following acronyms apply to the following use chart. If a cell in the table is blank, the use  
5 listed in the left hand column is a prohibited use in the zone that is the heading for that  
6 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	RCRI	RP	AC	FC	MC
RESIDENTIAL USES												

# **DRAFT – SHORT TERM RENTAL CODE**

**District Use Chart**

USE/ACTIVITY	RR20	RR10	RR5	RR2.5	RW	RRR	RV	RC	RI	RP	AC	FC	MC
Short-term Rental (no more than 5 bedrooms)	P(1)	P(1)	P(1)	P(1)	P(1)	P(1)	P(1)				CUP	CUP	

## 8 Peshastin UGA Code

### 9 11.22.030 Permitted, accessory and conditional uses.

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

16 (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

# **DRAFT – SHORT TERM RENTAL CODE**

## **Districts:**

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
<b>RESIDENTIAL USES</b>								
Short-term Rental (no more than 5 bedrooms)	CUP	CUP	CUP	CUP	CUP			

## **19 Manson UGA Code**

### **20 11.23.030 District use chart.**

- 21 The use chart located on the following pages is made a part of this section. The following acronyms apply to  
 22 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  
 23 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 <a href="#">11.88</a> and/or <a href="#">11.93</a>
A	Accessory use—Subject to development standards in Chapter <a href="#">11.88</a> and/or <a href="#">11.93</a>
CUP	Conditional use permit—Subject to development standards in Chapter <a href="#">11.93</a> and/or within this chapter

# DRAFT – SHORT TERM RENTAL CODE

Table 9.1 – District Use Chart

USE/ACTIVITY	UR1	UR2	UR3	CT	CD	MLI	UP
Vacation Rentals Short-term Rental (no more than 5 bedrooms)	P¹	P¹	P¹	A¹	A¹	-	-

Formatted Table

P¹ = Permitted with Standards

~~11.23.040 (3) Vacation 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.~~



**DRAFT – SHORT TERM RENTAL CODE**

~~14.98.920 Habitable space. "Habitable space" means space in a structure for living, sleeping, eating, or cooking. Bathrooms, toilet compartments, closets, halls, storage or utility space, and similar areas are not considered habitable space.~~

14.98.1125 Lot. "Lot" means a fractional part of divided lands having fixed boundaries, also known as property lines. The term shall include tracts and parcels.

14.98.1365 Parcel. "Parcel" means a tract, lot or plat of land of any size which may or may not be subdivided or improved.

14.98.1692 Short-term rental. Short-term rental or vacation rental means any dwelling or dwelling unit being provided for a fee for less than thirty consecutive days.

11.93.380 Short-term rental is allowed by this code, the following standards apply:

(1) One short-term rental is allowed on a lot, either in the single-family dwelling or an accessory dwelling, except for multiple unit developments or condominium developments.

(2) No more than two overnight guests per bedroom shall be accommodated at any one time. The number of bedrooms is determined by the approved building permit for the structure, or a floor plan shall be provided by the applicant indicating areas with sleeping accommodations provided. A guest is a person over six years of age.

(3) Solid waste must be removed from the short-term rental to an approved solid waste facility every week. Solid waste shall be stored in completely enclosed and secured solid waste receptacles that is protected from wildlife.

(4) One on-site parking space shall be provided for each two bedrooms within the short-term rental consistent with Chapter 11.90.

(5) All short-term rental permit holders are required to display the address of the residence so that it is clearly visible from the street or access road.

(6) No outdoor advertising signs are allowed.

(7) Short-term rental accommodations must meet all applicable local and state regulations, including those pertaining to business licenses and taxes such as Washington State sales, lodging and business and occupation taxes.

(8) The short-term rental shall be operated according to rules of conduct approved by the County that prevent the following disturbances to area residents:

(A) Trespassing that violates Chapter 7.32;

**DRAFT – SHORT TERM RENTAL CODE**

(B) Noise that violates Chapter 7.35;

(C) Off-site parking location for guests and visitors must be consistent with Chapter 11.90;

(E) Portable fireplaces/pits must be able to be locked when burn ban is in effect. Visitors shall comply with Chapter 7.52.

(9) All owners of property used for short-term rental shall comply with the following operational requirements:

(A) Maintain an up-to-date property management plan on file with the administrator. The property management plan must include the following:

(i) Rules of conduct approved by the County;

(ii) Unified business identifier number, and the names and addresses of the property owner and agents authorized to act on the property owner's behalf;

(iii) A designated local property representative who will address complaints and emergencies within 30 minutes; and

(iv) A valid telephone number where the local property representative can be reached 24 hours per day;

(v) The location of fire extinguishers, emergency exit routes from structure and property, the breaker box, water shut-off, gas shut-off, instructions regarding the septic system, and emergency numbers.

(vi) Properties with pools must ensure barriers such as fencing, alarms, and approved covers are installed as appropriate and in functioning order.

(B) A notice shall be provided to property owners with 360 feet of the lot which contains a short rental to include the Unified business identifier number, County permit number, property owner contact information, local property representative information, and a statement that the property management plan is on file with the Chelan County Department of Community Development which can be viewed upon request.

(C) Prominently display in the rental the rules of conduct and a map clearly depicting the property boundaries of the short-term rental with no trespassing signs posted adjacent to all private property. The map shall indicate if there is an easement that provides access to the shoreline or other recreational features; 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;

(D) Include the Chelan County permit number for the short-term rental in all advertisements and marketing materials such as brochures and websites;

**DRAFT – SHORT TERM RENTAL CODE**

(E) A short-term rental shall be permitted annually to certify compliance with any conditions of permit approval and with the fire and life safety requirements of the International Fire Code (IFC) and International Residential Code and/or International Building Code (IRC/IBC) as identified by the department on forms specified by the administrator as applicable for the installation and maintenance of fire extinguishers, smoke detectors, carbon monoxide alarms, and required egress. In addition septic and water will be verified. The short-term rental permit will be issued to the property owner and shall be prominently posted on site; and

(F) Short-term rental permit will not be transferrable to a new owner.

(10) A short-term rental shall not operate or be advertised without a short-term rental permit. Evidence of operation includes, but not limited to: advertising, online calendars showing availability, guest testimony, online reviews, rental agreements or receipts.

(11) Enforcement. 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 citation pursuant to Title 16. The third verified violation of this code section will result in a one year suspension of the short-term rental permit. Verified violations include, but are not limited to the following criteria: advertising/marketing, Sheriff's incident reports, photographic evidence, signage, videos, site visit evidence, online review or guest testimonials.



## Short Term Rental Data

June 14, 2019

### Special Note

This data set is derived from 138 properties in the Leavenworth area. We compiled data to the best of our ability in this way:

1. We polled property managers and asked for specific annual reporting data from 2018.
2. We used polling data to come up with statistics to derive a data set for a single STR property.
3. We then multiplied our individual property data by 1500. The 1500 number represents an estimated number of STR's operating in Chelan County.
4. Finally, we cross checked government databases as well previous data supplied and documented in the "Cooperative Approach" plan to verify our data where we could.

### Annual Revenue and Spending data in 2018

Data represents estimated annual revenue, tax revenue and booking information for all of Chelan County.

Rental rate revenue	\$38,200,000.00
*Guest spending during stay	\$29,800,000.00
State, County & Lodging tax	\$3,900,000.00
Number of bookings	61,500
Nights Occupied	153,750

\*Used a Host Compliance percentage of nightly rental rate multiplied by 78% to get spending data. Cited in presentation by vendor and by director CCCD in presentations.

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## **Wage and Subcontractor Information**

Wage and subcontractor data was pulled directly from property manager databases and multiplied to reflect Chelan County estimates. Subcontractor services represents primarily house cleaners, yard care, snow removal and pool spa maintenance contractors.

Wages-Directly paid by PM's	\$7,100,000.00
Subcontractor Services	\$8,800,000.00
*STR wage earners in CC	1957

\*Estimated full time and part time workers hired directly by PM's and subcontractors.

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## **Neighbor Issues**

Data was taken from PM's (3) who track neighbor and/or sheriff calls into their companies. Data was then multiplied to estimate all reported issues within Chelan County. We acknowledge that PM's or STR owners may not be notified on each and every neighbor issue.

Sheriff involvement- 7.5 calls annually out of 1500 homes renting or 0.005% per night rented.

Neighbor complaints to Owner/Manager-32 contacts annually out of 1500 homes or 0.02% per night rented.

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## **Summary**

We feel it is fair to say that the STR community provides great economic benefits to our residents, homeowners and local businesses. We also feel that this is data that should be considered when weighing the positive and negative impacts of STR's on our communities. The data indicates that the existence of STR's generates nearly 85 million dollars in direct revenue, tourist spending, resident wages and taxes. We were surprised at the extremely low numbers of complaints and neighbor issues. Admittedly PM's would likely have lower issues with neighbors as PM's are very proactive at resolving property issues. We invite you to request data from the Sheriff's office and please feel free to share with us. We once again request that a serious attempt be made to identify the issues surrounding STR's using data driven research before moving forward with proposed code changes.

Respectfully, The members of the Short Term Rental Alliance of Chelan County



MARY PAT BARTON

Page 1 of 2

Our Current  
Property Values

— are Highly Inflated —

Due to Commercial Use  
of the Transient Rentals  
are they  
No Longer ~~Real~~ Residential Homes  
that our Working Citizens  
can Rent &/ Buy to Be  
a HOME for them & their Family  
to Put their Heads on a Pillow  
After a hard days work

Sheriff  
Burrhead Estimates  
@ 1500 Vacational Rentals in Chelan  
Co.

Check out these #'s Licensed or <sup>un</sup>licensed  
are they ~~not~~ Paying Retail Sales to Chelan  
County  
for Sheriff/FIRE/Health & Safety  
are they Paying for Business Permits  
Commercial Insurance Catastrophic

When  
they  
are  
OWNERS OCCUPIED/They are  
on the Property 24/7 and Handling  
and all problems that Strangers



Property taxes need to be enacted  
① Residential Pg 2 of 2

② Farm ~~FOREST~~ ③ FOREST  
④ Commercial Property = Orchard  
⑤ Nightly Rental Use = commercial

"Home Owners Insurance"  
"wild fire damages" does not cover the damages  
done to neighbors Property  
if it is determined that  
Nightly Rental Business has  
been going on in the Residential  
HOME location

Some GMA areas  
Water (Wells) - are permitted  
for 2 ~~Family~~  
Residential  
properties

ENFORCEMENT -  
① Current safety standards  
Septic Systems Permitted  
for 2 Residential  
properties  
"TRANSIENT" Rentals  
State codes  
Not Commercial Use  
of these Properties

When I had Home Day Care Business  
I had to get ① Inspected +  
② City ③ State Licenced by ~~City~~ state  
④ My property had to get a Variance  
and my Neighbors had to be asked  
to allow that use in our Neighborhood  
Each Nightly Rental (Commercial) Business  
should be required to go thru this



**From:** [Jonathan Kim](#)  
**To:** [Wendy Lane](#)  
**Subject:** new regulations  
**Date:** Wednesday, July 24, 2019 5:02:49 PM

---

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

Please provide this to the planning commissioners

Dear Planning Commissioners,

I am writing this email to express my deep concerns regarding the new regulations that will put many families in your county out of business. I have lived outside of US for many years and have seen what regulations that try to control private property can do to communities. My understanding is that there is a testimony from the Chelan County Sheriff that vacation rentals are not a problem and that when it comes to nuisance complaints, they receive far fewer calls for vacation rentals than long term rentals, hotels, or traditional homeowners. We all want and need fundamental rules that actually protect private properties – that is what this great country is all about, but regulations that put families out of business for the sake of adding more regulations is the way communization works. These proposed regulations appear to be a solution in search of a problem and I hope the commissioners reexamine the true intentions of these new rules that are being proposed.

Regards,

Jonathan

**From:** [Carmen Totey](#)  
**To:** [Wendy Lane](#)  
**Subject:** input about vacation rental regulation  
**Date:** Tuesday, July 30, 2019 11:21:46 AM

---

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

Hello,

We are writing on behalf of our long-time friend Nathan Newell, who owns and operates a vacation rental, The Leavenworth Lodge. We understand that Chelan County is pursuing a law to regulate vacation rentals.

It seems clear that this change would greatly increase financial demands on vacation rental owners. While some owners are negligent, many are top notch and law abiding, such as the Newell family. Nathan Newell and family have a long-standing history of being upstanding citizens who make every effort to serve clients, enforce legal practice, respect neighboring entities, and boost the economy by bringing tourism and employing a local work force.

Pushing this legislation unfairly punishes quality vacation rental owners. There are laws in place that should be enforced with higher fines to target the law-avoiding owners; this should be the county's focus, not the law-abiding owners.

Also, we as Americans value free market competition, enabling both small and big companies to thrive. This legislation would put many families out of business and increase corporate dominance. Additionally, the loss of these businesses would drive up prices for available rentals and hotels. As a family who vacations in Leavenworth yearly, we might be priced out with increased cost.

Please include this communication in public record.

Thank you for your consideration.

Sincerely,

Jonathan and Carmen Totey  
Everett, Washington

**From:** [ZayLy Lodge](#)  
**To:** [Wendy Lane](#)  
**Subject:** I Support STRs!!  
**Date:** Wednesday, July 24, 2019 5:52:09 PM

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

Dear Chelan County Planning Commission,

My name is Chad Baker. My wife and I own a home in Leavenworth, WA. We are part of Chelan County. I am reaching out to you in regards to this evening's Chelan Planning Commission at 7:00-9:00 at the Confluence Technology Center. We are very concerned about how the proposed changes will affect our family and our residence in Chelan County. I wanted to share our story with you so that you can understand how the proposed changes will affect our decision to stay in Chelan County.

We bought land along on the Wenatchee River in February of 2016. We built our home to accommodate our immediate family and our extended family. We wanted our family to experience the beauty of Chelan County.

Due to work schedules and our children's schedules, we cannot always stay in Chelan County. We did not anticipate being pulled away from our Chelan home. In order to justify our ownership of the home, we do rent out our home when we are not staying there. We only VRBO and Airbnb. We have only received 5 stars reviews since we are committed to return customers and customer satisfaction.

Our listing clearly states that we do not allow parties, events or weddings. We turn a lot of people away who have requested to use our home for weddings. Our home comfortably sleeps 14 people in beds. We do not allow renters to exceed that number by having people sleep on couches, or other items. Our goal is not to have more than 14 people in the house. We remove our shoes when we enter our home and we also request our guests to do the same. This is our family home therefore we do not want anyone to damage it. We also take away the \$1000 damage deposit if guests violate our rules. One of them is that we have quiet hours between 10 PM- 8 AM. We will provide the deposit to our neighbors if our guests disturb them. We are very appreciative of our neighbors and want to ensure that they are not disturbed.

We employ Chelan County residences to help us take care of our property. Our property is valued at 3 times the average home in Leavenworth. Our property taxes contribute to the local

area. Our kids are not in school in Chelan County therefore they are not using the resources. Our renters pay taxes via VRBO and Airbnb that contribute to the county. We are very good citizens of this county and contribute to the local economy.

We depend on the income from short term rentals to pay our property taxes, vendors, keep up our property, and mortgage. If the proposed changes hampers our ability to generate income, we will have to look to selling.

Regards,  
Chad Baker

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**From:** [Manson Council](#)  
**To:** [Wendy Lane](#)  
**Subject:** Comments for Short Term Vacation Rentals  
**Date:** Wednesday, July 24, 2019 10:09:34 PM

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

Would you please forward this to the appropriate person? Thank you!

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July 24, 2019

Chelan County Community Developmental:

The Manson Community Council had a successful and well attended meeting on Tuesday, July 23, 2019. The meeting was called to specifically discuss the impact of Short Term Vacation Rentals throughout Manson UGA.

On behalf of the community of Manson, the Manson Community Council would like Chelan County to enact an immediate moratorium on STR's. We are requesting that the rentals that are currently operating LEGALLY within county requirements to be continued to be allowed to do so, however all of the rentals in operation that are operating outside and not in compliance with Chelan County's requirements be fined and terminated.

We are requesting that this moratorium remain in place until we, as a community and County, can determine exactly how many STR's are in legal operation, allow thought and solidification of enforcement of the regulations, and to determine how many STR's a small community the size and charm of Manson can support without destroying the character of the community that we love.

Respectfully,

Kari Sorensen  
Chairman  
Manson Community Council

**From:** [Mallory Kragt](#)  
**To:** [Wendy Lane](#)  
**Subject:** Community Development and Commissioner Meeting Regarding Vacation Rental Regulation  
**Date:** Wednesday, July 24, 2019 3:43:17 PM

---

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

Hi Wendy,

Please add this email to the county record.

As a Chelan County community member I would just like to voice my concerns with the new proposed regulations that would cause severe hardship on vacation rental owners. We have multiple friends who have established business that run nightly vacation rentals in the upper valley. For a lot of them this is a large, if not primary revenue source to support their family. These new restrictions and taxes would be devastating to their businesses and their families. They are incredible people, homeowners, and neighbors who respect and have tenants who abide by already established laws and regulations.

I understand that there are some irresponsible vacation rental owners, but please do not punish the ones that are adding to our local economy. There are already established laws, regulations and taxes for this industry. It would be much more appropriate to increase fines and enforce more heavily current rules rather than to make new laws.

Thank you for your time!

Mallory Kragt  
Cashmere Resident

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: 7/24 Hearing Letter  
**Date:** Thursday, July 25, 2019 8:15:43 AM  
**Attachments:** [image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Sean Lynn <[sean@loveleavenworth.com](mailto:sean@loveleavenworth.com)>  
**Sent:** Wednesday, July 24, 2019 4:11 PM  
**To:** Wendy Lane <[Wendy.Lane@CO.CHELAN.WA.US](mailto:Wendy.Lane@CO.CHELAN.WA.US)>; Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>  
**Subject:** 7/24 Hearing Letter

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

Hello Wendy and Lynn,

Sorry for the late notice but I wanted to submit a letter for the record for tonight's 7/24 STR hearing with the Planning Commission. Please excuse any typos or grammatical errors.

Dear Planning Commission,

I will be speaking at tonight's hearing and will try my best to present in a clear and concise fashion my views on the proposed STR regulations. I own Love Leavenworth Vacation Rentals and are very concerned with the proposed draft code. I and others have been working with local government leaders for the last 2 years trying to assist in resolving some of the issues surrounding STR's in our

communities. I have attended group meetings for those that both oppose and support STR's in our communities. I have been involved at local and city community meetings and I try to attend each and every commissioners meeting when CCCD is present. I was a critical figure in forming the Short Term Rental Alliance of Chelan County. I currently am not a member of STRACC as my personal message conflicts with STRACC's. I still support STRACC's efforts 100% and think that they have real and valid concerns that they will voice tonight as well.

I feel that the fundamental issue at hand concerning STR's is 2 fold.

1. STR's currently operate legally in neighborhoods and there are those neighbors who simply don't want that to continue to happen.
2. Neighbors that have issues with STR's do not know who to communicate with about their issues and end up turning to the County for help. Usually very frustrated by that point.

We all agree that staying in STR's has real benefits both economic and on a comfort level. We all agree that STR's provide great economic benefits to surrounding business and vendors. We all agree that STR's are now woven into the lodging sector fabric and a part of the lodging landscape across our nation. For better or worse depending on your outlook.

How do we solve these problems and more importantly does the code in front of us solve these problems?

Tonight I am submitting House Bill 1798 to the planning committee. House Bill 1798 regulates STR's at the State level and goes into effect 4 days from tonight. I don't believe staff submitted this important document in the workshop meeting. 1798 went basically unopposed by STR owners and operators across the State of Washington and for good reason its clear, concise and not overly restrictive to the STR industry. I join STRACC in saying that no new regulation is needed and that HB 1798 is enough to resolve the issues at hand in our County.

I would argue that STR's are amazingly self regulating via the guest review processes on airbnb and VRBO which tend to keep both guests and operators from straying outside of acceptable norms. I would argue that STR owners and operators are acutely aware of life and safety issues as they could be directly responsible if an injury occurs in their homes. Local, state and lodging taxes are all remitted by airbnb and the Homeaway (VRBO) which generate 95% of the bookings in our state. Most homeowners of STR's are not greedy business owners who don't care about anything but money. Most STR homeowners are well versed on customer service and creating a welcoming safe environment for their guests. This includes working with neighbors on any issues that may arise.

I ask that the planning commission tonight asks themselves constantly do these proposed codes solve problems and has community development properly identified the problems and given you all the resources needed to make good decisions.

I ask that you recommend that No new code is needed in our County to regulate STR's and if not that community development sit back down at the table with local professional, investigate what other counties are doing and follow up on what effect the regulations in other counties are seeing.

I am not opposed to some regulations but I am opposed to rushed regulations. Please stop these proposed codes from being codified or slow these code proposals down so that we form smart regulations that will properly address the real and identified issues at hand.

I have asked for extra time tonight to provide more data and to address the issues line by line in the draft code. Any extra time granted would be much appreciated and I promise to remain as focused as I can on delivering information to the Planning Commission. Thank You, Sean Lynn

Sean Lynn  
Love Leavenworth LLC.  
Leavenworth Washington  
W.509-548-5683 C.509-293-0814  
[www.loveleavenworth.com](http://www.loveleavenworth.com)

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: FRWC letter to the CC Planning Commission  
**Date:** Thursday, July 25, 2019 11:36:03 AM  
**Attachments:** [Chelan County draft STR Code 7 16 19 .docx](#)  
[image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Kevin Overbay  
**Sent:** Thursday, July 25, 2019 11:35 AM  
**To:** Kirsten Larsen <Kirsten.Larsen@CO.CHELAN.WA.US>; Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Cc:** Doug England <Doug.England@CO.CHELAN.WA.US>; Bob Bugert <Bob.Bugert@CO.CHELAN.WA.US>  
**Subject:** FW: FRWC letter to the CC Planning Commission

Kirsten/Lynn here is a draft comment list from Jerry Holm (Forest Ridge) he sent after last night's meeting. Could you please add it to the STR record. Thank you.

Kevin

**Kevin Overbay**  
**Chelan County Commissioner, District 1**  
**Office: (509) 667-6218**  
**Cellular: (509) 630-3263**

---

**From:** Jerry Holm <[jholm@nwi.net](mailto:jholm@nwi.net)>

**Sent:** Thursday, July 25, 2019 8:36 AM

**To:** Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>

**Subject:** FRWC letter to the CC Planning Commission

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

Good morning Commissioner,

Attached is the letter regarding FRWC comments to the Planning Commission. After attending the meeting last night, I thought it best to share the letter directly with you. As always, thank you for all you do! Jerry

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: Short Term Rentals - Comments and concerns.  
**Date:** Thursday, July 25, 2019 8:03:18 AM  
**Attachments:** [image001.png](#)

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*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Dave Kuhl  
**Sent:** Thursday, July 25, 2019 7:17 AM  
**To:** Kirsten Larsen <[Kirsten.Larsen@CO.CHELAN.WA.US](mailto:Kirsten.Larsen@CO.CHELAN.WA.US)>; Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>  
**Subject:** FW: Short Term Rentals - Comments and concerns.

---

**From:** Bob Bugert <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>  
**Sent:** Thursday, July 25, 2019 6:19 AM  
**To:** Susan Huffman <[huffman@nwi.net](mailto:huffman@nwi.net)>  
**Cc:** Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>; Doug England <[Doug.England@CO.CHELAN.WA.US](mailto:Doug.England@CO.CHELAN.WA.US)>; Dave Kuhl <[Dave.Kuhl@CO.CHELAN.WA.US](mailto:Dave.Kuhl@CO.CHELAN.WA.US)>  
**Subject:** Re: Short Term Rentals - Comments and concerns.

Susan,

Thank you for providing these detailed comments related to short term rentals. We will include these into our record and in our deliberations.



If you wish, we will include you as a party of record, so you will receive updates and notifications on the development of this rule.

Thanks again,  
Bob Bugert

Sent from my iPhone

On Jul 24, 2019, at 6:56 PM, Susan Huffman <[huffman@nwi.net](mailto:huffman@nwi.net)> wrote:

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

Bob,

Thank you for the opportunity to comment on the draft proposed code regarding short term rentals. I have several areas of concern with the draft code as well as a question regarding how the Leavenworth UGA will be treated.

**First the county-wide proposed code:**

**Enforcement. This is a key issue.** WHO is enforcing this? How do we report issues to start the 1, 2, 3 strikes penalties? Who will keep the tally of strikes?

Will there be automatic county-led enforcement after 'strikes' or will the residents have to continue reporting and reporting and reporting?

**Parking.** One off street parking space per two bedrooms is **not sufficient**. The rentals near us in the Ski Hill loop area routinely have one+ car per bedroom as they are rented by groups of adults, not families with children, and thus there is one car for every bed - including every one of those sofa beds in the living room or game room that do not count as a "bedroom." I suggest a minimum of one space per bedroom but it really should be one parking space per sleeping space - whether bedroom or sofa bed.

**The fine.** A \$750 fine is too low. That's less than a weekend rental - and in some cases less than one night's charge.

**300 ft. notice:** Please consider expanding the 300 feet rule for notification to neighbors. We are routinely impacted by rentals that are over 300 feet from us.

**Trash.** Bear issues abound around Leavenworth, yet trash and recycling bins are left out on the road for days at a time by short term rentals.

**One per lot.** What is one 'lot' for the purpose of this? Density is a big issue to many of us as we see our residential neighborhoods turn into commercial lodging zones.

**Urban growth area for Leavenworth.**

Will the County align the UGA with the City regulations? We have continually been told by both City and County staff that the UGA *should* mirror the City

regulations, but that has never been instituted. Will the County address it at this juncture? It would certainly be appreciated.

We seem to be in no-mans land. The City will not enforce in the UGA and the County has in the past deferred or avoided enforcement with a generic letter about priorities and we clearly are not on that priority list. We need a clear decision and clear regulations that reflect the City of Leavenworth. We need enforcement.

Thank you for your consideration.

I appreciate the opportunity to share my concerns and questions.

Susan Huffman

**From:** [Sean Lynn](#)  
**To:** [Wendy Lane](#); [Lynn Machado](#)  
**Subject:** 7/24 Hearing Letter  
**Date:** Wednesday, July 24, 2019 4:11:03 PM

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

Hello Wendy and Lynn,  
Sorry for the late notice but I wanted to submit a letter for the record for tonight's 7/24 STR hearing with the Planning Commission. Please excuse any typos or grammatical errors.

Dear Planning Commission,  
I will be speaking at tonight's hearing and will try my best to present in a clear and concise fashion my views on the proposed STR regulations. I own Love Leavenworth Vacation Rentals and are very concerned with the proposed draft code. I and others have been working with local government leaders for the last 2 years trying to assist in resolving some of the issues surrounding STR's in our communities. I have attended group meetings for those that both oppose and support STR's in our communities. I have been involved at local and city community meetings and I try to attend each and every commissioners meeting when CCCD is present. I was a critical figure in forming the Short Term Rental Alliance of Chelan County. I currently am not a member of STRACC as my personal message conflicts with STRACC's. I still support STRACC's efforts 100% and think that they have real and valid concerns that they will voice tonight as well.

I feel that the fundamental issue at hand concerning STR's is 2 fold.

1. STR's currently operate legally in neighborhoods and there are those neighbors who simply don't want that to continue to happen.
2. Neighbors that have issues with STR's do not know who to communicate with about their issues and end up turning to the County for help. Usually very frustrated by that point.

We all agree that staying in STR's has real benefits both economic and on a comfort level. We all agree that STR's provide great economic benefits to surrounding business and vendors. We all agree that STR's are now woven into the lodging sector fabric and a part of the lodging landscape across our nation. For better or worse depending on your outlook.

How do we solve these problems and more importantly does the code in front of us solve these problems?

Tonight I am submitting House Bill 1798 to the planning committee. House Bill 1798 regulates STR's at the State level and goes into effect 4 days from tonight. I don't believe staff submitted this important document in the workshop meeting. 1798 went basically unopposed by STR owners and operators across the State of Washington and for good reason its clear, concise and not overly restrictive to the STR industry. I join STRACC in saying that no new regulation is needed and that HB 1798 is enough to resolve the issues at hand in our County.

I would argue that STR's are amazingly self regulating via the guest review processes on airbnb and VRBO which tend to keep both guests and operators from straying outside of acceptable norms. I would argue that STR owners and operators are acutely aware of life and

safety issues as they could be directly responsible if an injury occurs in their homes. Local, state and lodging taxes are all remitted by airbnb and the Homeaway (VRBO) which generate 95% of the bookings in our state. Most homeowners of STR's are not greedy business owners who don't care about anything but money. Most STR homeowners are well versed on customer service and creating a welcoming safe environment for their guests. This includes working with neighbors on any issues that may arise.

I ask that the planning commission tonight asks themselves constantly do these proposed codes solve problems and has community development properly identified the problems and given you all the resources needed to make good decisions.

I ask that you recommend that No new code is needed in our County to regulate STR's and if not that community development sit back down at the table with local professional, investigate what other counties are doing and follow up on what effect the regulations in other counties are seeing.

I am not opposed to some regulations but I am opposed to rushed regulations. Please stop these proposed codes from being codified or slow these code proposals down so that we form smart regulations that will properly address the real and identified issues at hand.

I have asked for extra time tonight to provide more data and to address the issues line by line in the draft code. Any extra time granted would be much appreciated and I promise to remain as focused as I can on delivering information to the Planning Commission. Thank You,  
Sean Lynn

Sean Lynn  
Love Leavenworth LLC.  
Leavenworth Washington  
W.509-548-5683 C.509-293-0814  
[www.loveleavenworth.com](http://www.loveleavenworth.com)

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: STR Public Comment  
**Date:** Thursday, July 25, 2019 8:08:34 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*

[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Lori Vandenbrink <[lvandenbrink@sleepinglady.com](mailto:lvandenbrink@sleepinglady.com)>  
**Sent:** Wednesday, July 24, 2019 5:44 PM  
**To:** Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>  
**Subject:** STR Public Comment

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

Dear Chelan County Planning Commission,

I am a fifteen year resident of Leavenworth, a mother of a 15 year old and a Sales and Marketing Director in the Hospitality Industry. Let me start by saying that I love where I live!

I'm not opposed to short term vacation rentals. I have friends that run B&Bs, have ADUs, and know locals that own STRs, but I do believe there need to be some increased controls particularly related to rentals of entire homes in single family residential zones in the unincorporated area. I appreciate you reviewing our current code and making the appropriate amendments.

Like Amsterdam, Venice, Iceland and even some US National Parks like Zion, Leavenworth is experiencing over tourism. At an estimated 1-2 million visitors annually, that is **500-1000 times** the towns current number of residents. Please read that last sentence again.

It's no secret that there is a severe shortage of long-term rentals in Leavenworth and the Upper Valley. STRs are using up space that otherwise might be used for living. Local families who want to live where their kids can walk to school, the park, grocery store...can't find available homes to buy or rent.

In addition, the increasing number of STRs is threatening the character of our neighborhoods and transforming the quality of life in our town. STRs quietly rob communities of their collective voice to speak out about local issues that affect us. Vacation renters don't care how good the local schools are, if bike sharrows need repainted on the Hwy. 2 or Icicle Creek Rd needs repaved, speeding issues through neighborhoods, land development, pollution, or a host of other issues that homeowners and long-term renters are concerned about. Another troubling issue is the increasing numbers of STRs is eroding the close-knit neighborhoods we have built. The minute a home is turned it to an STR, that house is no longer a contributing part of the neighborhood. The permanent residents can no longer count on that house as part of the neighborhood. And the home's owner transforms from a neighbor into a business owner. The residual issues, particularly without an owner on site to monitor use is especially challenging.

In reviewing the draft, I did see, and appreciate some standards related to the challenges we are facing in the Upper Valley related to STRs and such nuisances as noise, adequate parking and trash management. I didn't however see anything related to the density of STRs. In Leavenworth, on VRBO alone there are **576 vacation rentals near Leavenworth**. When is enough enough? I strongly feel there needs to be a cap on the number of vacation rentals in our neighborhoods in order to preserve the quality of life we all moved to Leavenworth, and the Upper Valley to enjoy.

For instance...

In Cannon Beach, an OR tourist community of 1,900 has capped their str permits at 92.

In Manzanita, another OR tourist community, a cap on short-term rentals in the three zones. This cap shall be 17.5% of the dwelling units within these zones.

Thank you again for reviewing these issues and taking our concerns seriously. Please keep Leavenworth and Chelan County a great place to live, not just vacation.

Lori Vandenbrink  
12690 Ranger Road  
Leavenworth, WA. 98826

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** FW: STR Public Comment  
**Date:** Wednesday, July 24, 2019 4:18:16 PM  
**Attachments:** [image001.png](#)

---

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Glen Austin <[zippydisposal@hotmail.com](mailto:zippydisposal@hotmail.com)>  
**Sent:** Wednesday, July 24, 2019 4:18 PM  
**To:** Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>  
**Cc:** Brenda Blanchfield <[Brenda.Blanchfield@CO.CHELAN.WA.US](mailto:Brenda.Blanchfield@CO.CHELAN.WA.US)>  
**Subject:** STR Public Comment

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

Hi Lynn,

I am writing on behalf of Zippy Disposal Service, Inc. We provide refuse collection service to the northern portion of Chelan County pursuant to regulatory authority from the Washington Utilities and Transportation Commission.

In reading the draft of the new short term rental code, we are concerned by the changes made to the paragraph

dealing with solid waste service and thought we could provide you with some important information.

We have extensive experience providing collection service over the years to the vacation rentals in the area.

The average vacation rental produces between one to two yards of garbage per week during peak season, which is equivalent to six to twelve regular cans of garbage. And most owners vastly underestimate this fact until they have a mess on their hands and try to make a property manager clean it up. Generally property managers are not authorized to haul garbage. Minimum levels of service based on maximum occupancy need to be established not only for health and safety, but to keep neighborhoods from having piles of trash sitting around due to inadequate regular service.

We see dozens of people at our facility on Sundays and Mondays looking for a place to take their garbage. They often tell us they stayed at a VRBO or vacation rental and were told they had to pack out their own garbage. The Transfer Station in Chelan is closed on Sundays and Mondays since they are not allowed to haul out on weekends, and to allow the City of Chelan and our company capacity for the huge volumes we collect from the weekend. This is when these people start looking around for unlocked dumpsters to dump in or often they place the bags alongside someones can. We get way too many calls from customers that call in and say someone put a bunch of bags next to my can, what do I do? And we have to tell them, they are yours now. The new proposed revision to the code simply stating that it must be removed to an approved solid waste facility does not address having adequate capacity and weekly scheduled subscribed service.

We are also seeing many vacation rentals operating during the off season on popular holidays or events. Some keep their collection service active but with reduced capacity, but many cancel their service. We get renters calling us on what to do with their garbage, or property managers in a panic trying to restart service. Some provision needs to be made that insures vacation rentals maintain a minimum level of service.



Glen Austin, Controller  
Zippy Disposal Service, Inc.  
(509)682-5464

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** Fwd: STR Public Comment  
**Date:** Wednesday, August 14, 2019 1:22:29 PM

---

Sent from my iPhone

Begin forwarded message:

**From:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>  
**Date:** August 14, 2019 at 11:28:24 AM PDT  
**To:** Bob Bugert <[bob.bugert@co.chelan.wa.us](mailto:bob.bugert@co.chelan.wa.us)>, Lynn Machado <[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)>  
**Subject:** STR Public Comment  
**Reply-To:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>

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After the last few days of disruptions in our neighborhood my patience has come to an end. Noise and partying until 2:30am is not okay.

This nuisance of transient renters would never be allowed to continue in a Hotel, Bed and Breakfast or even in a campground, yet it is going on in our neighborhood.

The owners of these properties do not live here, they do not see what is going on, nor do they care. One owner stated "I don't care what the zoning laws are, I'm going to do what I want." It has come to my attention that adjacent neighbors do not complain because they are doing the same.

What would you do? Would you welcome this next door to you?

I did not spend decades of my life paying off my mortgage to live in this environment.

I am asking if you would please take care of the residents who live, work and worship here.

Thank you,  
Rebecca Hills  
509.670.4825

**From:** [Michelle](#)  
**To:** [Wendy Lane](#)  
**Subject:** Plz add to county records. Renters in our county  
**Date:** Monday, July 29, 2019 4:17:12 PM

---

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

Hey Wendy,  
unfortunately I didn't know about the meeting until it was too late. I thought I would write and just share my experience with you.

We purchased a 1905 house on lower Sunnyslope Road with the intention of renting rooms occasionally. We do use Airbnb for bookings, as well as have people contact us directly from our Facebook or webpage. We absolutely, 100% depend on this income or we would have not purchased this home. We have had no problems with guests and have not caused any problems for others. It's a very quiet and simple business for us. As we look toward retirement in the next 10 years, this home and our rental income is what we will be depending on. I hope that those who have caused problems will not dictate regulations for those of us who have been happily and quietly running our business.

Make a great day,  
Michelle McCormick  
Sent with a smile from my iPhone

**From:** [Joe Monahan](#)  
**To:** [Wendy Lane](#)  
**Cc:** [Tom Monahan](#)  
**Subject:** Short term rentals  
**Date:** Wednesday, July 24, 2019 4:36:45 PM

---

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

My parents were able to fix up an old house, invest in our community and be able to spend time with their grandchildren while living here part time because they are able to rent their house out part time. These regulations attempt to make their investment in this property have punitive consequences. Their neighbors are aware of the rental already, have no problem with it, you are wanting them to advertise to the other neighbors when the house may be vacant? It seems this would open their home up for petty crime? Your regulations presented to our community need to be reexamined. Thanks for your consideration.

--

Joe Monahan  
Captain, B shift  
[jmonahan@chelancountyfire.com](mailto:jmonahan@chelancountyfire.com)  
cell (509) 421-2352



**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Tuesday, July 30, 2019 3:22:04 PM  
**Attachments:** [image001.png](#)

---

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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---

**From:** Rhonda Lowry <lowryrhonda@comcast.net>  
**Sent:** Tuesday, July 30, 2019 11:48 AM  
**To:** Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** rental parking on Cedar Brae Rd Lake Wenatchee

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

Hi Lynn,

I am writing you regarding concerns we have at our Lake Wenatchee home. Two of our neighbors are short term rentals. They are renting year round. During the summer months we sometimes have parking issues because renters don't completely understand where they are supposed to park. They have designated spots but sometimes we have to help them park correctly. There are a couple homes, including ours, who have an easement so that we can turn around in order to get to our homes, and this is where the renters sometimes park making

it difficult for us to turn around. We don't like to "babysit" the renters when they don't understand where they are supposed to park.

In the winter months our driveway is not accessible, and homeowners need to park on the main road above our homes, Cedar Brae Rd., where there are only a few spaces available. Your current code, 11.90.030, references where a short term rental needs to have two parking spaces available for ALL WEATHER use, that need to be lit appropriately. Our concern in the winter is that these two properties are being rented with no designated parking spaces available to renters. If they rent during the winter and the renters take the only few spots available on Cedar Brae then there is no parking for homeowners who want to use their properties.

Please confirm our understanding of the current code so that we can determine if we should file a code violation with your office.

Thank you for your time,

Rhonda Lowry

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Monday, August 5, 2019 2:21:09 PM

---

The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:  
**CLICK HERE TO TAKE THE SURVEY!**

Kindest Regards,  
Lynn Machado  
Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)

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-----Original Message-----

From: Kevin Overbay  
Sent: Monday, August 5, 2019 8:21 AM  
To: Bywater-Johnsons <[bnsf@nwi.net](mailto:bnsf@nwi.net)>  
Cc: Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>; Doug England <[Doug.England@CO.CHELAN.WA.US](mailto:Doug.England@CO.CHELAN.WA.US)>; Bob Bugert <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>  
Subject: RE: VRBO comments

Nancy, thank your comments and concern. We will be having a series of public meetings as we work through the Short Term Vacation Rental (STVR) topic, the August 28th hearing is with the planning commission. If you wish to provide comment you can do so through verbal or written means whichever is most convenient for you. I will be forwarding your most recent email to our Community Development Department so that it might become part of the official record. I have also cc'ed Lynn Machado, who is gathering the comments and would be happy to ensure you are placed on the distribution list for STVR should you request. Please reach out to her if that is of interest to you. Again thank you for taking the time to inquire and provide your feedback.

Kevin

Kevin Overbay  
Chelan County Commissioner, District 1  
Office: (509) 667-6218  
Cellular: (509) 630-3263

-----Original Message-----

From: Bywater-Johnsons <[bnsf@nwi.net](mailto:bnsf@nwi.net)>  
Sent: Monday, August 5, 2019 7:19 AM  
To: Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>  
Subject: VRBO comments



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

Good morning Mr. Overbay,

I am a resident of Chelan county, and am aware that Chelan County is wrestling with how to regulate VRBOs in the county. I see there will be a public meeting on August 28, however, I will be out of town.

As many neighborhoods have been experiencing, we have a new house being built near us to be utilized as a VRBO, and another close by is already a VRBO. While our covenants and shared well association clearly define that this is for residential, non-commercial use, we have recently found that the new home will be used as a VRBO. Besides the noise issue (which is already an issue, it becomes an issue of water usage as well). We have done some preliminary checking and it appears that covenants carry no legal weight.

I realize this is a complex issue, but as I understand, there is no way at this point to regulate this in Chelan county. This translates into lost revenue for the county, loss of neighborhood community, and relatively no accountability for the VRBO owner. I am aware of different formats in other tourist driven areas, that at least try to maintain some balance.

I am curious if there is a place to weigh in without going to the meeting.

Thank you for serving Chelan County.

Nancy Bywater  
10680 Fox Rd.  
Leavenworth, WA 98826  
509-293-2095

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** Fwd: STR Public Comment  
**Date:** Wednesday, August 14, 2019 1:22:29 PM

---

Sent from my iPhone

Begin forwarded message:

**From:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>  
**Date:** August 14, 2019 at 11:28:24 AM PDT  
**To:** Bob Bugert <[bob.bugert@co.chelan.wa.us](mailto:bob.bugert@co.chelan.wa.us)>, Lynn Machado <[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)>  
**Subject:** STR Public Comment  
**Reply-To:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>

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Thank you,  
Rebecca Hills  
509.670.4825

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Tuesday, July 30, 2019 3:22:04 PM  
**Attachments:** [image001.png](#)

---

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Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Rhonda Lowry <lowryrhonda@comcast.net>  
**Sent:** Tuesday, July 30, 2019 11:48 AM  
**To:** Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** rental parking on Cedar Brae Rd Lake Wenatchee

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Hi Lynn,

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Please confirm our understanding of the current code so that we can determine if we should file a code violation with your office.

Thank you for your time,

Rhonda Lowry

**From:** [Michelle](#)  
**To:** [Wendy Lane](#)  
**Subject:** Plz add to county records. Renters in our county  
**Date:** Monday, July 29, 2019 4:17:12 PM

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Make a great day,  
Michelle McCormick  
Sent with a smile from my iPhone

**From:** [Joe Monahan](#)  
**To:** [Wendy Lane](#)  
**Cc:** [Tom Monahan](#)  
**Subject:** Short term rentals  
**Date:** Wednesday, July 24, 2019 4:36:45 PM

---

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My parents were able to fix up an old house, invest in our community and be able to spend time with their grandchildren while living here part time because they are able to rent their house out part time. These regulations attempt to make their investment in this property have punitive consequences. Their neighbors are aware of the rental already, have no problem with it, you are wanting them to advertise to the other neighbors when the house may be vacant? It seems this would open their home up for petty crime? Your regulations presented to our community need to be reexamined. Thanks for your consideration.

--

Joe Monahan  
Captain, B shift  
[jmonahan@chelancountyfire.com](mailto:jmonahan@chelancountyfire.com)  
cell (509) 421-2352



**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** Fwd: STR Public Comment  
**Date:** Wednesday, August 14, 2019 1:22:29 PM

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Sent from my iPhone

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**From:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>  
**Date:** August 14, 2019 at 11:28:24 AM PDT  
**To:** Bob Bugert <[bob.bugert@co.chelan.wa.us](mailto:bob.bugert@co.chelan.wa.us)>, Lynn Machado <[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)>  
**Subject:** STR Public Comment  
**Reply-To:** Rebecca Hills <[mamahills@frontier.com](mailto:mamahills@frontier.com)>

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

After the last few days of disruptions in our neighborhood my patience has come to an end. Noise and partying until 2:30am is not okay.

This nuisance of transient renters would never be allowed to continue in a Hotel, Bed and Breakfast or even in a campground, yet it is going on in our neighborhood.

The owners of these properties do not live here, they do not see what is going on, nor do they care. One owner stated "I don't care what the zoning laws are, I'm going to do what I want." It has come to my attention that adjacent neighbors do not complain because they are doing the same.

What would you do? Would you welcome this next door to you?

I did not spend decades of my life paying off my mortgage to live in this environment.

I am asking if you would please take care of the residents who live, work and worship here.

Thank you,  
Rebecca Hills  
509.670.4825



**From:** [Michelle](#)  
**To:** [Wendy Lane](#)  
**Subject:** Plz add to county records. Renters in our county  
**Date:** Monday, July 29, 2019 4:17:12 PM

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

Hey Wendy,  
unfortunately I didn't know about the meeting until it was too late. I thought I would write and just share my experience with you.

We purchased a 1905 house on lower Sunnyslope Road with the intention of renting rooms occasionally. We do use Airbnb for bookings, as well as have people contact us directly from our Facebook or webpage. We absolutely, 100% depend on this income or we would have not purchased this home. We have had no problems with guests and have not caused any problems for others. It's a very quiet and simple business for us. As we look toward retirement in the next 10 years, this home and our rental income is what we will be depending on. I hope that those who have caused problems will not dictate regulations for those of us who have been happily and quietly running our business.

Make a great day,  
Michelle McCormick  
Sent with a smile from my iPhone

**From:** [Joe Monahan](#)  
**To:** [Wendy Lane](#)  
**Cc:** [Tom Monahan](#)  
**Subject:** Short term rentals  
**Date:** Wednesday, July 24, 2019 4:36:45 PM

---

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

My parents were able to fix up an old house, invest in our community and be able to spend time with their grandchildren while living here part time because they are able to rent their house out part time. These regulations attempt to make their investment in this property have punitive consequences. Their neighbors are aware of the rental already, have no problem with it, you are wanting them to advertise to the other neighbors when the house may be vacant? It seems this would open their home up for petty crime? Your regulations presented to our community need to be reexamined. Thanks for your consideration.

--

Joe Monahan  
Captain, B shift  
[jmonahan@chelancountyfire.com](mailto:jmonahan@chelancountyfire.com)  
cell (509) 421-2352



**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Tuesday, July 30, 2019 3:22:04 PM  
**Attachments:** [image001.png](#)

---

*The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:*  
[CLICK HERE TO TAKE THE SURVEY!](#)

Kindest Regards,

*Lynn Machado*

Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)



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**From:** Rhonda Lowry <lowryrhonda@comcast.net>  
**Sent:** Tuesday, July 30, 2019 11:48 AM  
**To:** Lynn Machado <Lynn.Machado@CO.CHELAN.WA.US>  
**Subject:** rental parking on Cedar Brae Rd Lake Wenatchee

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

Hi Lynn,

I am writing you regarding concerns we have at our Lake Wenatchee home. Two of our neighbors are short term rentals. They are renting year round. During the summer months we sometimes have parking issues because renters don't completely understand where they are supposed to park. They have designated spots but sometimes we have to help them park correctly. There are a couple homes, including ours, who have an easement so that we can turn around in order to get to our homes, and this is where the renters sometimes park making

it difficult for us to turn around. We don't like to "babysit" the renters when they don't understand where they are supposed to park.

In the winter months our driveway is not accessible, and homeowners need to park on the main road above our homes, Cedar Brae Rd., where there are only a few spaces available. Your current code, 11.90.030, references where a short term rental needs to have two parking spaces available for ALL WEATHER use, that need to be lit appropriately. Our concern in the winter is that these two properties are being rented with no designated parking spaces available to renters. If they rent during the winter and the renters take the only few spots available on Cedar Brae then there is no parking for homeowners who want to use their properties.

Please confirm our understanding of the current code so that we can determine if we should file a code violation with your office.

Thank you for your time,

Rhonda Lowry

**From:** [Lynn Machado](#)  
**To:** [Wendy Lane](#)  
**Subject:** STR Public Comment  
**Date:** Monday, August 5, 2019 2:21:09 PM

---

The Department of Community Development would appreciate your feedback. Please take a moment to complete our Public Experience Survey:  
**CLICK HERE TO TAKE THE SURVEY!**

Kindest Regards,  
Lynn Machado  
Community Development Office Manager

316 Washington Street, Suite 301  
Wenatchee, WA 98801  
Phone: (509) 667-6225  
[lynn.machado@co.chelan.wa.us](mailto:lynn.machado@co.chelan.wa.us)

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-----Original Message-----

From: Kevin Overbay  
Sent: Monday, August 5, 2019 8:21 AM  
To: Bywater-Johnsons <[bnsf@nwi.net](mailto:bnsf@nwi.net)>  
Cc: Lynn Machado <[Lynn.Machado@CO.CHELAN.WA.US](mailto:Lynn.Machado@CO.CHELAN.WA.US)>; Doug England <[Doug.England@CO.CHELAN.WA.US](mailto:Doug.England@CO.CHELAN.WA.US)>; Bob Bugert <[Bob.Bugert@CO.CHELAN.WA.US](mailto:Bob.Bugert@CO.CHELAN.WA.US)>  
Subject: RE: VRBO comments

Nancy, thank your comments and concern. We will be having a series of public meetings as we work through the Short Term Vacation Rental (STVR) topic, the August 28th hearing is with the planning commission. If you wish to provide comment you can do so through verbal or written means whichever is most convenient for you. I will be forwarding your most recent email to our Community Development Department so that it might become part of the official record. I have also cc'ed Lynn Machado, who is gathering the comments and would be happy to ensure you are placed on the distribution list for STVR should you request. Please reach out to her if that is of interest to you. Again thank you for taking the time to inquire and provide your feedback.

Kevin

Kevin Overbay  
Chelan County Commissioner, District 1  
Office: (509) 667-6218  
Cellular: (509) 630-3263

-----Original Message-----

From: Bywater-Johnsons <[bnsf@nwi.net](mailto:bnsf@nwi.net)>  
Sent: Monday, August 5, 2019 7:19 AM  
To: Kevin Overbay <[Kevin.Overbay@CO.CHELAN.WA.US](mailto:Kevin.Overbay@CO.CHELAN.WA.US)>  
Subject: VRBO comments

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

Good morning Mr. Overbay,

I am a resident of Chelan county, and am aware that Chelan County is wrestling with how to regulate VRBOs in the county. I see there will be a public meeting on August 28, however, I will be out of town.

As many neighborhoods have been experiencing, we have a new house being built near us to be utilized as a VRBO, and another close by is already a VRBO. While our covenants and shared well association clearly define that this is for residential, non-commercial use, we have recently found that the new home will be used as a VRBO. Besides the noise issue (which is already an issue, it becomes an issue of water usage as well). We have done some preliminary checking and it appears that covenants carry no legal weight.

I realize this is a complex issue, but as I understand, there is no way at this point to regulate this in Chelan county. This translates into lost revenue for the county, loss of neighborhood community, and relatively no accountability for the VRBO owner. I am aware of different formats in other tourist driven areas, that at least try to maintain some balance.

I am curious if there is a place to weigh in without going to the meeting.

Thank you for serving Chelan County.

Nancy Bywater  
10680 Fox Rd.  
Leavenworth, WA 98826  
509-293-2095

**From:** [Camila Borges](#)  
**To:** [Wendy Lane](#)  
**Subject:** Vacation Rental Injustice  
**Date:** Wednesday, July 24, 2019 4:17:05 PM

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

Hi Wendy,

I am a property owner in Leavenworth and I would like to write to you about the changes in the legislation of vacation rental.

Actions are being take to punish good vacation rental owners for the problems of bad vacation rental owners. Chelan county should take the cases closely and fine who is not respecting regulations.

The county laws that already exist prohibiting noise, garbage and parking. Enforce the current laws with higher fines so bad vacation rental owners (which are minority) stop offending dont seem a good solution. We don't need new regulation.

I appreciate your time and take in consideration that most of vacation rental owners dont disturb and follow all ordinances and higher fees might only take income from simple families.

Thank you,  
Camila

## Kirsten Larsen

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**From:** Steve Harada <harada.steve@gmail.com>  
**Sent:** Sunday, September 8, 2019 10:48 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of [1] short-term rental unit in Leavenworth for the past [X] years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Kathy & Steve Harada



## Kirsten Larsen

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**From:** Jane Mounsey <janelymounsey@gmail.com>  
**Sent:** Friday, August 23, 2019 12:14 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity; skifreek65 .  
**Subject:** For Submission To The Public Record

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

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Dear Commissioners & Planning Commission Director,

We are the owners of a home in Peshastin that we occasionally share with guests who come here to enjoy all the same things we do: the fun shops, restaurants and other attractions in Leavenworth, the river rafting, skiing, hiking and biking, etc. We have a local property manager who rigorously screens potential guests and enforces existing codes and the terms of our contract vigorously, as needed (which is exceedingly rare).

We are deeply concerned about the proposed new code regulations and how they will impact our ability to keep our home for our near-future retirement. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our future, not to mention the local economy with the loss of lodging tax revenues and tourist dollars. If our guests cannot rent a home for their visit, they are likely to find another community that will welcome them vs. stay in a nearby hotel.

We do our best to be respectful of our neighbors and have a property manager on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our home that has resulted in a complaint that required a police response.

Chelan County Community Development is unable to provide any data that short term rentals create more nuisance issues than long-term rentals or permanent residents. There is however strong evidence that existing codes which address the typical complaints of noise, parking and garbage are not being enforced. We strongly encourage you to consider enforcing current codes effectively, before creating new regulations which will be even more difficult to enforce.

Thank you in advance for your consideration.

Jane and Steve Mounsey

## Kirsten Larsen

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**From:** Tim Du Val <tdv@dvenyc.com>  
**Sent:** Friday, August 23, 2019 12:49 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental unit near LEAVENWORTH for for the past 20 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Timothy Du Val  
PS please feel free to call me  
718-392-7474 x 107 if you have any questions or wish to verify any thing Thanks Tim

Tim

## Kirsten Larsen

---

**From:** Bill Willcock <wwillcock@gmail.com>  
**Sent:** Friday, August 23, 2019 1:03 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental unit at Lake Wenatchee for the past year. I am deeply concerned about the proposed code regulations and how they will impact my situation. The revenue we receive from STR's is critical to paying for our living expenses, retirement plan AND importantly, our escalating tax bills. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
William Willcock

## Kirsten Larsen

---

**From:** symonty <symonty@symonty.org>  
**Sent:** Friday, August 23, 2019 1:26 PM  
**To:** Kirsten Larsen  
**Cc:** Kevin Overbay; Bob Bugert; Carlye Baity; Doug England  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm the property Owner of a short-term rental home at 9284 Icicle Road Leavenworth for the past 2 years. This amazing place was built in 1985 and has been a highlight of the area since.

We were very excited to open our property to families and non profits through short term rental, so they can experience the beauty of the region.

We are deeply concerned about the proposed code regulations would threaten ability of visitors to the region to enjoy the surrounds as well as our investment , our futures, and the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. Our 4 acre property is well maintained and has given many families the opportunity to experience the beauty of the Chelan region. Our property is not in direct contact with any other residents and As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

I am worried that besides my property not being a concern that maybe these rules try address an issue that is not real.

From what I have been told out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Symonty and Jill Gresham.

## Kirsten Larsen

---

**From:** Jon Croy <joncroy@gmail.com>  
**Sent:** Friday, August 23, 2019 1:36 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental unit just outside of Leavenworth in Chelan County for the past 5 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's helps to pay for living expenses and retirement plans.

The County's representation of the lawful nature of short-term vacation rentals had tremendous impact on our decision to purchase our property in Chelan County versus in Leavenworth. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response. In fact, just last month the opposite occurred when a guest had to call 9-1-1 to report an illegal bonfire at the home of a permanent resident.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Jon Croy

## Kirsten Larsen

---

**From:** Zelda Holgate <zeldascott123@gmail.com>  
**Sent:** Friday, August 23, 2019 1:52 PM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property manager of 6 short-term rental units in Plain, Washington since 2011. Natapoc Lodging was one of the first vacation rental businesses in the state starting in the fall of 1989. I am deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue I and my owners receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase the business. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Zelda Holgate

## Kirsten Larsen

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**From:** Jordan Brown <goducks@me.com>  
**Sent:** Friday, August 23, 2019 2:31 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of two short-term rental units at my home in Leavenworth for the past two years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to invest in developing our property to operate these two units. We have invested over 30k in this development. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors. We are owner occupied living at our property. There has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing\* nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Jordan Brown  
509 679 1123

## Kirsten Larsen

---

**From:** Shauna Arnaud <shaunaarnaud@yahoo.com>  
**Sent:** Friday, August 23, 2019 3:20 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Carlye Baity; Doug England  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

My husband and I have been property owners of one short-term rental home in Leavenworth for the past year. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy. We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response. The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff's department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—(codes which will work!) before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations. Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely, Shauna (and Tim) Arnaud



## Kirsten Larsen

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**From:** Tony Meier & Team <tony@windermere.com>  
**Sent:** Friday, August 23, 2019 4:02 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental unit in Manson for the past 3 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints in the last 2 years.

I urge you to enforce the laws you already have on the books and not further penalize the owners of STRs, risking our property values and the stability of the local economy.

It's a Good Life!

Tony Meier & Team  
*"... The Broker You Refer to Your Friends"*  
Serving Buyers and Sellers Since 1989  
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## Kirsten Larsen

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**From:** Tim Miller <tim\_s\_miller@hotmail.com>  
**Sent:** Friday, August 23, 2019 6:21 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of two short-term rental units (STR's) in Leavenworth for the past 5 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances (codes which will work!) before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Tim & Diane Miller

## Kirsten Larsen

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**From:** Gillian Shaw <icgs241@gmail.com>  
**Sent:** Saturday, August 24, 2019 3:28 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of 3 short-term rental units in Leavenworth for the past 13 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Gillian Shaw

Sent from my iPhone

## Kirsten Larsen

---

**From:** Allison Wong <allisonwong123@gmail.com>  
**Sent:** Sunday, August 25, 2019 4:23 AM  
**To:** Kevin Overbay; Bob Bugert; Doug England; Carlye Baity; Kirsten Larsen  
**Subject:** Fwd: For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental ("STR") unit in Plain for the past few years. I am concerned about the proposed code regulations and how they will impact my investment. The revenue I receive from STRs is critical to paying for our living expenses and retirement plans. The new regulations would threaten my investment and future ability to be part of the community, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while we understand that the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. This is hardly justification for the proposed cumbersome new regulations.

I believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances, before creating burdensome new regulations specifically targeting STR owners. This would include adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Allison L. Wong

## Kirsten Larsen

---

**From:** Brian Besand <brian.besand@gmail.com>  
**Sent:** Monday, August 26, 2019 11:27 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of 1 short-term rental unit in Plain for the past 3 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Brian Besand - Painted Pony Cabin by Northwest Comfy Cabins

**Kirsten Larsen**

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**From:** Barb Knapp <dknapp3140@aol.com>  
**Sent:** Monday, August 26, 2019 5:15 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

We are the property owners of 1 short-term rental unit in Leavenworth for the past 4 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy. We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response. The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already "existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations. Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019. Sincerely,

Dennis & Barbara Knapp

## Kirsten Larsen

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**From:** Adam Ware <adampware@gmail.com>  
**Sent:** Monday, August 26, 2019 5:22 PM  
**To:** +bob.bugert@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us;  
+doug.england@co.chelan.wa.us; +kevin.overbay@co.chelan.wa.us; Kirsten Larsen  
**Subject:** For Submission into the Public Record

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Dear Commissioners & Planning Commission Director, I'm a property [OWNER/MANAGER] of [#] short-term rental units in [LOCATION] for the past [X] years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy. We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response. The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations. Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely, Adam Ware

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Adam Ware  
Cell: 360-333-7577  
Fax: 360-424-8228

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**Kirsten Larsen**

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**From:** Mark <toklat2@nwi.net>  
**Sent:** Monday, August 26, 2019 6:24 PM  
**To:** Kirsten Larsen  
**Subject:** Short Term Rentals - 8/28/19 Public Hearing

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

Please enter the following comments into the record for the proposal.

Dear Commissioners:

We are homeowners in the Sunnyslope Subarea. Our subdivision is zoned for single family residential use. We have lived in our home for 16 years.

In April of this year, the house directly behind us was sold. It was then immediately converted into a VRBO by the new absentee landowner who told me that they have no intention of living in the home. This VRBO being advertised for use by up to 16 people, including for "work and church retreats." This use presents an adverse effect to us as landowners in this zoning district.

We question how is this commercial use compatible with single family residential neighborhood use? For us, living here is now like having a Holiday Inn next door. There is a constant churning of people, vehicles, and noise. How would you feel if it was next door to you?

We are totally against VRBOs in our neighborhood. They are not compatible with single family home ownership and use. They are a business and should only be allowed in areas zoned for commercial and business use.

Additionally, we have protective covenants that do not allow for rental properties in our neighborhood; however, to enforce these covenants, we would have to take our so-called "neighbors" to court. The county should not adopt rules that subvert these existing covenants.

In closing, we urge you to not allow short-term rentals in areas zoned Single Family Residential.

Sincerely,

Mark & Nina Schulz  
3695 Ridgeview Pl  
Wenatchee, WA 98801

Sent from my iPhone

## Kirsten Larsen

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**From:** Jen Beaulieu <jenannbeau@gmail.com>  
**Sent:** Monday, August 26, 2019 9:13 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property Owner of a recently built home in the Ponderosa Community. I am deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we will receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to build our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors. Unfortunately the same can not be said for numerous full time residents in the Ponderosa Community. My property is surrounded by multiple code violations, including non permitted ADUs, yards being used as trash dumps, constant noise nuisances, animal abuse and neglect, domestic violence, drug and criminal activity. I have had to call the Sheriff on more than one occasion and have contacted Chelan County Code enforcement about my concerns, which has had no impact at all. The idea of Chelan County implementing STR regulations while codes and laws already in place are not enforced is preposterous.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Jennifer Beaulieu

## Kirsten Larsen

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**From:** Mike Smith <miklorsmith@gmail.com>  
**Sent:** Tuesday, August 27, 2019 10:42 AM  
**To:** Kirsten Larsen; +kevin.overbay@co.chelan.wa.us; +bob.bugert@co.chelan.wa.us; +doug.england@co.chelan.wa.us; +carlye.baity@co.chelan.wa.us  
**Subject:** For consideration, short term rentals, from an owner

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

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Dear Commissioners & Planning Commission Director,

My wife and I have been visiting Chelan County for over 20 years. Throughout, it has been our dream to own a home. Last year, that dream came true, and we were able to buy near Lake Wenatchee. We cannot yet retire, and our jobs are on the west side, but we are at the house every moment we can. It will be our retirement home the minute we're able, and we can't wait to live the four seasons every single day.

At my work, land use regulation is a central part. Some of the proposed code makes sense to me, which zones allow rentals is clear. Requiring locking fire pits during burn bans makes sense, but it would be smart to clarify that gas pits are not subject to this provision.

'No more than 5 bedrooms' though – there are houses with 5 bedrooms that sleep 25 people and others than sleep 10. What is the point of this? If potential noise is the concern, why focus on bedrooms? And what if the larger house is on a 20-acre lot? This would be a blunt instrument. What about 'multiple unit developments', where rental has been the use for many years? Ceasing existing, long-term use is punitive. No trespassing signs shouldn't be required for fenced properties. This is unsightly and a solution looking for a problem.

The Property Management Plan, filed with Administrator, *inviting complaints*, tells ornery neighbors to file multiple violations and try to achieve what they could not by Court action – shutting down short-term rentals. The 'plan', 'on file', would attach to the annual permit, which could be shut down by loud complainers. One or two vocal activists could close a rental, which would be a travesty. It also would put Staff in a very bad position, having to referee between private parties. Proposed 11.93.380(11) "*Verified violations include, but are not limited to the following criteria: advertising/marketing, Sheriff's incident reports, photographic evidence, signage, videos, site visit evidence, online review or guest testimonials.*" There is nothing good about any of this, literally giving opponents an arsenal. If a neighbor calls the Sheriff and they come to the house, this qualifies as a "verified violation"? Calling a couple times and now the rental is shut down for a year?

These incentives are far more about the quality and predilections of the people surrounding rental homes than the companies running them, or guests, the vast majority of whom are responsible. What happens when a property gets 'shut down'? We have guests booked this upcoming weekend, and months out. Our home is booked at Christmas this year. We're going to cancel those people's vacations? How much notice is planned before giving property owners the shaft?

This is bad architecture, promising to be rife with headaches for everyone involved.

As owners, we'd prefer not to rent out our home, but it is unaffordable otherwise. Ours was on the market over 2 years before we bought it. Our management company is focused, local, and a positive force in the community. With new State regulations, and existing rental rules, adding to the burden appears to cater to a few, vocal opponents rather than a holistic and reasonable approach.

Please reconsider some of these onerous property suggestions.

Mike Smith, 2220 Riffle Dr.

## Kirsten Larsen

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**From:** Janice Wakefield <janicew35@me.com>  
**Sent:** Tuesday, August 27, 2019 3:10 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Cc:** info@straccwa.org  
**Subject:** For Submission into the Public Record Regarding STRs

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

Dear Commissioners & Planning Commission Director,

I have owned and operated a short term vacation rental in Leavenworth since 2009. I am a single parent and rely on this income to support myself and my two children. My ex-husband and I intentionally purchased this property (outside of the city limits) so that we could rent it out nightly and even had approval from the County. We never would have purchased the property if nightly rentals were not permitted.

In spite of approval from the County, I had a cease and desist "case" in 2015 (I still have no idea why someone from the County had been on my property looking for issues). I worked with Angel Hallman and Doug Lewin to make sure my property was/is in complete compliance.

Needless to say, I am very worried about the proposed regulations of STRs.

Please consider that I have been paying the appropriate taxes all of these years and I employ cleaning staff, pool staff and yard staff.

I have a good relationship with my neighbors. If my guests are ever too noisy, my neighbors call me and then I call the guests. Ironically, the only time my neighbors called me to complain about noise this summer, was when I was there with my own kids playing in our pool.

The only time I had a "bigger" problem at my property was in 2014 when I allowed a low income local man (who worked at Sleeping Lady Resort) stay at my place with his bride and family the night of their wedding. That night new neighbors (who were camping on their vacant lot) called the sheriff to complain of noise. Again, this was not a short term rental. This was a local friend/person staying at my place.

My understanding is that before my ex-husband and I purchased the property the sheriff was called multiple times due to illegal drug use and DV incidents between the previous owners.

Please consider my story when making decisions about the proposed regulations. I am truly worried they will affect my livelihood.

Thank you,  
Janice Wakefield  
206-890-9725  
Icicle Camp  
7713 Icicle Road

## Kirsten Larsen

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**From:** Tim Du Val <tdv@dvenyc.com>  
**Sent:** Tuesday, August 27, 2019 3:22 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of one short-term rental units in near LEAVENWORTH for the past 20 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
DAGNY ERDA HANSEN / Du Val  
917-584-6260

Sent from my iPad

## Kirsten Larsen

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**From:** Tim Du Val <tdv@dvenyc.com>  
**Sent:** Tuesday, August 27, 2019 3:26 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Cc:** ALLISON Du Val; dan@destinationleavenworth.com  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a Part property Owner of a short-term rental unit in Leavenworth for the past 20 years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Allison Du Val  
917-848-0450

Sent from my iPad

## Kirsten Larsen

---

**From:** Nick Radovich <nick@jcrdevco.com>  
**Sent:** Tuesday, August 27, 2019 3:26 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property owner of a short-term rental unit in Plain for the past ten years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints.

Sincerely,

Nick Radovich and Kristen French

Serenity Pines Lodge



## Kirsten Larsen

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**From:** Nancy Sprinker <patamaplace@gmail.com>  
**Sent:** Tuesday, August 27, 2019 3:38 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a property OWNER/MANAGER of 1 short-term rental units in Plain for the past 4 years. I am deeply concerned about the proposed code regulations and how they will impact my livelihood. The revenue I receive from STR's is critical to paying for my operating expenses including property taxes and retirement plans. I relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase my property. The new regulations would threaten my investment and future, not to mention the local economy.

I have been a good steward of my property, and caring for the surrounding community in good faith. I do my best to be respectful of my neighbors and am on call to respond quickly to any nuisance created by my guests. As far as I am aware, there has never been an incident at my rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. I believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Nancy Sprinker

**Kirsten Larsen**

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**From:** Ben Ropka <ben.ropka@gmail.com>  
**Sent:** Tuesday, August 27, 2019 3:57 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Cc:** Sandy Ropka  
**Subject:** For Submission into the Public Record

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

Dear Commissioners & Planning Commission Director,

I'm a property owner of one short-term rental unit in Nason Creek for the past three years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff department. We believe the county simply needs to prioritize enforcing already \*existing" nuisance ordinances—codes which will work! before creating burdensome new regulations specifically targeting STR owners. This means adequately resourcing Sheriff's department staffing to respond to nuisances occurring on weekends in particular. The fines collected would pay for the additional resources and address the nuisance issues being considered much better than these new code regulations.

Please accept this letter into the public record for the second public hearing on STRs on Aug 28, 2019.

Sincerely,  
Ben and Sandy Ropka  
Raven Haven Lodge

## Kirsten Larsen

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**From:** Kaela Valdes <kv@seattlemetroagent.com>  
**Sent:** Tuesday, August 27, 2019 4:05 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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

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Dear Commissioners & Planning Commission Director,

I'm a Licensed Real-estate Broker & property MANAGER of 3 short-term rental units in Leavenworth (unincorporated Chelan county) for the past 5 years. And I have sold homes to my clients who also use those property's as vacation rentals. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue both I and my clients receive from STR's is critical to paying for our living expenses and retirement plans. Both my clients and I relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors in fact we support many of our neighbors' local businesses who help us with grounds maintenance and housekeeping. We are on call to respond quickly to any nuisance created by our guests as well as any questions our guest have. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

There are current laws in place to protect the rights of neighbors and integrity of our neighborhoods and address common concerns with Vacation Rentals. Such as noise and parking violations. Please don't strip us of our rights to use our property as the county has historically permitted us to, by regulating us to the point of not being able to freely operate.

Furthermore, the County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints%..

Thank you,

*Kaela Valdes, ABR, CRS, SFR*  
Keller Williams Greater Seattle  
253-219-7752  
[www.SeattleMetroAgent.com](http://www.SeattleMetroAgent.com)

Seattle Magazines, "Best in Client Satisfaction" Six year award winner

## Kirsten Larsen

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**From:** Melissa Roy <melissareneeroy@hotmail.com>  
**Sent:** Tuesday, August 27, 2019 4:14 PM  
**To:** Kirsten Larsen; Kevin Overbay; Bob Bugert; Doug England; Carlye Baity  
**Subject:** For Submission into the Public Record

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Dear Commissioners & Planning Commission Director,

I'm a property [OWNER/MANAGER] of [#] short-term rental units in [LOCATION] for the past [X] years. We are deeply concerned about the proposed code regulations and how they will impact our livelihood. The revenue we receive from STR's is critical to paying for our living expenses and retirement plans. We relied on the County's representation of the lawful nature of short-term vacation rentals when deciding to purchase our property. The new regulations would threaten our investment and our futures, not to mention the local economy.

We have been good stewards of our property, and caring for the surrounding community in good faith. We do our best to be respectful of our neighbors and are on call to respond quickly to any nuisance created by our guests. As far as we're aware, there has never been an incident at our rental that has resulted in a complaint to the police or required a police response.

The County CCCD has yet to provide convincing data that STR's create significantly more nuisance issues than long-term rentals or permanent residents, while the Sheriff has supplied a complete report showing only two verifiable noise complaints that were responded to in the last two years. This means that out of some 350,000 room nights rented, there were only 2 documented complaints dealt with by the Sheriff%

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## Kirsten Larsen

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**From:** stacey hurd <staceyhurd@gmail.com>  
**Sent:** Tuesday, August 27, 2019 4:16 PM  
**To:** Kirsten Larsen  
**Subject:** Short-Term Noise Regulations - Feedback

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Hello,

I'm writing to express my support for the proposed short term rental regulations and was provided this email to share my feedback. Thank you for your consideration on the below.

**Background:** When we purchase our house in Plain seven years ago it was a sleepy road with families living here or using it as their weekend getaway. Fast-forward to a couple years ago and we are now surrounded by short-term rental properties managed by Vacasa. Short-term renters simply do not appreciate that people live here and might not appreciate late nights partying which are especially common during the Summer weekends and Oktoberfest. It truly has changed the neighborhood for those of use here full-time and not for the better.

**Some of the common issues I experience are as follows;**

1. Late night partying and noise. Visitors simply do not care because they will be gone tomorrow.
2. Garbage is not properly disposed of which invites wildlife to rummage through the bins. This is harmful to wildlife and is unsightly. Nobody wants to see dirty diapers in their driveway which is what we have experienced.
3. Trespassing - Random strangers walking around your property despite no trespassing signs. We have a dog so it becomes an issue.
4. Noise - Did I mention noise? I cannot underscore this issue.

Unfortunately rentals companies like Vacasa simply show no interest in stepping up to adequately address this.

In general I think the draft regulations are good and appreciate the work you're doing in this area. I have the following comments:

**-Noise.** The noise regulation seems wishy washy. How do I record and report noise at 2am, and who decides if it's acceptable or not? What about 9pm? 10pm? I recommend a stronger set of verbiage here. What about "quiet hours"?

**-Bedrooms.** The formula for number of bedrooms is easily manipulated. If the owner just has to provide a floor plan showing sleeping arrangements then they can just provide bunks, sofa beds. There are seemingly no limits. I recommend that the number of bedrooms be determined by the lower of the number of

bedrooms from an approved building permit, or the number of bedrooms supported by a health department approved septic installation (if applicable). There is a reason why the septic systems are approved for a specific number of bedrooms; I don't want my drinking water contaminated. It can't just be a building permit because mine back in 1992 had 3 bedrooms but there is actually only one real bedroom and that's what my septic is rated for.

**-24 hour support.** I'm in strong support of the provision for a 24 hour telephone number but I believe it should also have a number that can be texted. Texting will allow for better documentation of concerns and response for review afterward. Do we need to clarify that the 30 minute response is applicable for every day in the year?

Thank You,  
Stacey Hurd  
16975 River Road,  
Leavenworth, WA 98826