

**Jessica K. Thompson**

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**From:** justin leigh <wjleigh@gmail.com>  
**Sent:** Thursday, September 5, 2024 1:26 PM  
**To:** CD Comment  
**Subject:** Support for STR Code Changes

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

I think it's great that we're re-evaluating the restrictions on STRs. People enjoying our area need more places to stay, STR are a great way for families to experience the area and the homeowners in many cases invested in their properties expecting to be able to offset costs with rental income. Encouraging tourism is great for businesses and will have a positive impact on the economics of the entire region.

Justin Leigh  
Leavenworth Home Owner

## Jessica K. Thompson

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**From:** Scott Mitchell <gropo.delux@yahoo.com>  
**Sent:** Thursday, September 5, 2024 7:57 AM  
**To:** CD Comment  
**Subject:** Opposing STR rules change

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

To whom it may concern,  
Please do not loosen the current guidelines for STRs. We have one right on top of us, it has become more tolerable since the codes rules were set, so it's supremely frustrating that here we are again....why does the community has to argue this subject over and over when the circumstances haven't changed? Imagine having a party next to your house every night with no owners present to police the situation. This is still a real community filled with working people who need to get sleep, children in school who need to get sleep, and home owners who deserve to enjoy their own yard. I know that the property managers would love to increase their profit margins, but the one next to me is owned by someone who already owns 5, they are making plenty of \$\$\$ already. Please let the local working class heart and soul of this town retain the current compromise that was already agreed upon.

Thank you for your consideration,  
Scott Mitchell  
7895 E Leavenworth Rd  
Leavenworth WA 98826

**Jessica K. Thompson**

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**From:** Jim Passage <jimpassage@msn.com>  
**Sent:** Friday, September 6, 2024 5:18 PM  
**To:** CD Comment  
**Subject:** STR code change

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

I do not support the idea of changing the allowed number of STR units allowed under the current code.

Jim Passage

## Jessica K. Thompson

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**From:** heather price <huprice@gmail.com>  
**Sent:** Friday, September 6, 2024 5:51 PM  
**To:** CD Comment  
**Subject:** Public comment on STR

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

Dear Commissioners,

As a homeowner and tax payer in Chelan County, I am submitting comment on the revisions to the STR code that are currently under consideration. Below, briefly summarized are my perspectives on several issues in the code. In short, I agree with the STRACC recommendations.

Excluding infants under 24 months from two-per-bedroom occupancy limit.

I am in agreement with STRACC in welcoming this proposed change, which would make Chelan County's code more consistent with that of peer jurisdictions and with the practices of leading booking platforms.

Booking platforms including Airbnb do not count infants under 24 months as guests at the time of booking. As such, STR operators in Chelan County are placed in an awkward position of cancelling reservations, issuing refunds, and forcing guests to rebook elsewhere upon learning that a guest made a reservation that includes infants under 24 months. There is no evidence that this industry-standard practice of omitting infants from guest limits has caused problems with noise, parking, or septic systems in peer jurisdictions.

Changing Tier 1 to include a manager or operator on site.

This change would increase opportunities to develop parcels with a long-term renter in one unit serving as an on-site manager for an STR, incentivizing more rental housing development and allowing for creative arrangements for on-site managers to defray their rent costs.

Language in 3(A)(ii) on page 29 of the PC's August 28 packet seems to require owner to live on site, which contradicts earlier language opening up Tier 1's to include owners, managers, and operators on site. It may be intended to apply only to parcels with multiple dwelling units, but could be interpreted to apply to any parcel. The intention of this passage should be clarified.

Replacing self-certification with mandatory annual inspections.

I agree with STRACC and oppose this change, which will impose significant time and monetary costs on owners with little benefit. There is no evidence that there is currently a problem with false reporting or safety issues. Homeowners, STR operators, and insurance companies are well aware of liabilities and are adequately incentivized to address issues in self-certification.

Requiring proof of paying sales tax and lodging tax annually at time of renewal.

This change is unlikely to achieve any real benefit, but it is going to impose compliance costs on operators. Most STR bookings are made through platforms such as VRBO and Airbnb, which collect and remit sales and lodging taxes on behalf of operators. Larger property management companies also take direct bookings, and are already required by state law to pay all applicable taxes. Requiring documentation of taxes paid will force owners to compile documentation from across multiple platforms, but is unlikely to increase tax collections. The Department of Revenue is competent to ensure collection of sales and lodging taxes, and enforcement is best left to them.

#### Changes to parking rules.

I agree with STRACC in welcoming the removal of the requirement that parking not be located in a setback. This change will hold STRs to the same standards as other home owners in this regard. STRACC is concerned that the language defining "vehicles" may be too broad as written. It could be interpreted to count a truck towing a trailer with two personal watercraft on it as 4 vehicles. STRACC encourages allowing property managers to establish site-specific parking limits, and to clearly communicate these to guests. A single vehicle can easily accommodate 4 or even 6 guests. The requirement of one parking space per two guests encourages additional traffic on highways and roads in our county.

Replacing discretionary hardship exemption for late permit renewal applications with progressive late fees and delayed issuance.

This is a reasonable proposal I believe would be better than the status quo for both owners and CD staff.

#### Changing cap percentages.

I understand that a cap on STRs was central to the Task Force agreement. However, it has become clear that STRs are not uniformly distributed around the county. I agree with STRACC in recommending applying a 6% cap at the county level, rather than separately within ZIP codes and subareas. Under such a system, only the countywide STR percentage would be used to determine whether new STR permits can be issued.

If ZIP code and subarea caps are retained, I agree with STRACC recommendation increasing the caps in the Leavenworth ZIP code to 9% in return for reducing the Manson cap from 9% to 6%. This would bring the Leavenworth area cap into line with current STR counts, which represent more than a 60% reduction from 2020 levels.

#### Signage Rules

I am in strong agreement with STRACC that the requirements for signs to be permanent, weatherproof, and reflective to be excessive. I, like most STR operators, have spent hundreds of dollars on my STR property on new signs since the code was adopted. Changing the requirements now will require me to spend even more to replace perfectly functional signs.

#### Additional Land Use Permits

4(C)(i) on p. 37 states that operating an STR requires an STR permit "and, in some cases, an additional land use permit." It is not clear what additional permits this is referring to. I would like to better understand the implications of this language for STR operators like myself.

#### Cleaning up language relating to existing nonconforming STRs.

I appreciate the effort to clean up the code by removing sections that are no longer relevant. However, before this is done, I would like to ensure that removal of this language cannot be later construed to remove the right to continued operation for existing nonconforming STRs that were in operations before the original code was adopted.

Thank you for your consideration.

Sincerely,  
Heather Price

18751 Coulter Creek Rd  
Leavenworth, WA  
98826

## Jessica K. Thompson

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**From:** Joni Fisher <jonimfisher@msn.com>  
**Sent:** Friday, September 6, 2024 5:54 PM  
**To:** CD Comment  
**Subject:** RE: STR Comments

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

Hello Commissioners,

I would like to add a few comments.

1. Parking and occupancy shouldn't be tied together. We should establish limits for cars and occupancy separately, we shouldn't reduce occupancy due to parking limits. We have 8 occupancy, 4 parking spaces and I have never had 4 cars onsite (I check on driveway camera for each group who comes) Most renters are families with children, they do not all come 2 to a car. We limit the number of cars as appropriate, and renters determine their travel plans based on that; we should be encouraging more people per car.
2. We continue to hear how STR's effect affordable housing, but what I see in the market doesn't suggest that. There is a nice house for sale in Manson with a transferable STR permit, it has been on the market for months, has been reduced in price a few times and it is still not sold. It seems clear that the permit hasn't raised the value or driven investors to snap/bid it up. Real Estate in Chelan County is expensive due to the beautiful recreational area, STR's haven't done that.
3. Allowing a caretaker/manager in a Tier 1, isn't making it a Tier 2 with 2 units. The owners - caretaker/manager is an employment relationship, not a LTR relationship, part of your employment benefits would be reduced or no rent, in exchange for onsite property management/oversite. There are so many locals that could really use this kind of opportunity, we should do all we can to help increase the opportunity for affordable housing. This would really be a benefit to the community.

Thanks for your consideration.

Sincerely,  
Joni

**From:** Joni Fisher  
**Sent:** Wednesday, August 28, 2024 11:09 AM  
**To:** CD.Comment@CO.CHELAN.WA.US  
**Subject:** STR Comments

Hello Commissioners,

I would like to send in a couple comments on the proposed STR Code changes.

1. Not counting kids 2 and under would be a huge improvement.
  - a. One to align with most other jurisdictions and platforms
  - b. More importantly, families are the best renters. Asleep early, no wild parties. I love to see the multi-generational renters, it's a great memory making experience, introduces kids to the wonders of Chelan County and are the best repeat customers.



2. Allowing "Renter/Care Taker" to manager Tier 1's would be a huge benefit to Chelan County tourism and affordable housing, just think if some of the current ADU's and potentially new ADU's could be renter to local residents at a discounted rate, Win Win. The current rule is just meant to make it harder to have an STR, this is a win for RUN but isn't a win for most of the residents of Chelan County.
3. Is there an issue with the current signage requirements we are trying to solve here or just add another burden? Do we really need glowing permanent signs on our homes, this is intrusive to the neighborhood appeal and neighbors. We aren't trying to make the neighborhoods look or feel like commercial zones, why does the county want or need this? This shouldn't be any more of a safety issue for fire, 911 then any other residence.
4. STR's and Resident homes should be treated equally in the rules for parking... these parking rules were just used as another way to shut down some STR's. Not due to actually issues or fairly enforcing these requirements for all.
5. Why are we revisiting the Manson UGA percentage, with the 200FT limit, Manson is unlikely to hit the 9% limit. It was negotiated and agreed to by the representative from the Mason Community counsel. We can also clearly see by the current percentages in the UGA, this 9% caps is not causing an issue or explosion in STR's.
6. Why is this needed, have there been issues? Eliminates self-certification checklist and instead requires annual inspections for "life-safety and applicable short-term rental or conditional land use permit standards." No evidence there's a problem with false reporting or safety issues, but there will be a lot of headaches, money and time for owners, CD and the fire marshal to deal with scheduling and reporting inspections. Likely an additional inspection fee to be added to already-increasing permit fees
7. This is nearly impossible for an STR to do, most of the homes are on sites that collect and pay the taxes on our behalf. We have already tried this and determined this is not feasible. There could be a few bad actor's out there but there is slim minority. Contrary to popular belief most STR owners do Love and Care about Chelan County and do the right/legal thing.
8. Replaces discretionary hardship exemption for late permit renewal applications with late fees (amount TBD), and no commitment to process them on time: This 100% should be changed, having one person get to decided what is and isn't a hard ship, and a person who is anti-STR is not a good process. Fine the late renewals with double permit fee fine and they will be on time the next year. There should be some commitment on processing the renewals, CD must have some guidelines spelled out in this, or they are let them linger indefinitely. Arbitrary decisions should not be allowed.
9. Please don't change the transfer requirements to include changes required due to divorce or death of one or both owners. Sure if the house is sold, that makes since but this is just trying to make it more difficult for the current owners.
10. Although not listed... requiring a land line in all STR's is antiquated technology and not really solving any safety issues. If a home doesn't have cell service maybe they should be required but 90+ % of the house do have cell coverage. This has just been a big when for Local Tel, other providers and tax authorities. There are pretty high taxes on a land line. My phone has cost me 1K so far in two years, has rang 5 times and appears to have had 10 out going calls.

Sincerely,  
Joni Fisher

## Jessica K. Thompson

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**From:** Chris Peterson <dogdog@gmail.com>  
**Sent:** Friday, September 6, 2024 5:42 PM  
**To:** CD Comment  
**Subject:** Comments on proposed STR code changes

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

Dear BOCC,

I operate an STR in Peshastin. Overall, I agree with the proposed STR code changes and am appreciative of the updates. The only proposed change I take issue with is an annual inspection rather than the self-certification. The self-certification is an annual reminder for STR operators to check fire extinguishers, smoke alarms, and other key safety items. Speaking personally, I'd never let one of these items lapse. Further, all STR operators had a fire marshal inspection during the first year of the code enforcement. It definitely seems burdensome (and potentially expensive) to have an annual inspection. My recommendation is to maintain the self-certification process. If that is deemed unacceptable for a demonstrable reason (has an issue been identified?), then perhaps inspections every 3 years would be suitable.

Thanks for your consideration.  
Christine Peterson



## Jessica K. Thompson

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**From:** Delores Kinsman <deekinsman@gmail.com>  
**Sent:** Friday, September 6, 2024 7:41 PM  
**To:** CD Comment; Delores Kinsman; Dave Kinsman  
**Subject:** Comments on Proposed STR Code Changes

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

**Excluding infants under 24 months of age from 2 per bedroom occupancy limits:**  
I support this change.

**Changing Tier 1 to include a manager or operator on site:**

I support this change as I do think it will encourage more rental opportunities and income opportunities for county residents if STR is not owned by a county resident.

**Replacing self-certification with mandatory annual inspections:**

I support this change. As an STR owner, I think we owe it to the renters to ensure the highest standards of safety (working smoke, carbon monoxide alarms and unexpired fire extinguishers at a minimum) which I don't believe would take place if left to an honor [system.be](https://www.system.be) ensured in a self-certification situation.

**Requiring proof of paying sales tax and lodging taxes annually at time of renewal:**

I am in support of this change IF the STR owner/company can control whether AirBnb/VRBO/Home Away collect these taxes and pay them to the county automatically. As long as those platforms collect taxes automatically, I don't think this requirement will achieve much as it won't identify a direct booking scenario. If the STR rentals on these platforms can be set so that the owner/company collects the taxes directly and then remits to the county then yes, I do support this change. It takes just minutes to gather this information from each platform and I don't believe it would be a huge burden to compile and submit comprehensive proof. I did it when the rules changed and it literally took me less than 30 minutes to do.

**Changes to parking rules:**

I agree with the STRACC with regards to parking rules.

**Changing CAP Percentages:**

I support decreasing the Manson cap to 6% but do not agree with the STRACC in moving to a county-wide cap and/or increasing the Leavenworth cap.

**Signage Rules:**

I do not support and agree with the STRACC's comments on this change.

Thanks,  
Delores Kinsman

## Jessica K. Thompson

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**From:** Tomas Vetrovsky <tomasv@tomasv.com>  
**Sent:** Friday, September 6, 2024 7:55 PM  
**To:** CD Comment  
**Subject:** STR code proposed changes

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

Hi, we are writing you to comment on the proposed code changes for operating STR. We are a family of 4, who are operating a single STR, this way it enables us to spend time in Leavenworth, where we have been coming for 10+ years. Without our STR we would not be able to do that. We are active members of the community and never had an infraction or complain against our STR.

We are **supporting** the following proposed changes:

- Excluding the infants under 24 months from the 2 per bedroom occupancy.
- Change the language to allow owner/manager/operator to be present on site

We are **opposing** the following proposed changes:

Self certification checklist – this only brings administrative burden as the scheduling for the original fire marshal visit was a nightmare, and it does not seem there are systemic safety issues. We are OK with a requirements in the middle, that would require submitting pictures as a proof in the online platform.

Proof of sales tax annually – this should be on the county to verify via the access to their records, us compiling this in all the places like Airbnb, VRBo, Hotels, booking.com and many others is a much higher burden.

Reflective signs – that is a visual hindering as they are likely to be made from plastic (not environmentally friendly!) and for many, including us we only have wood/stone within the property to keep a character of mountain house. Ok with being weatherproof and permanent.

These are changes we would like to propose for the future:

**Eliminate the VOIP/Landline requirement.** We are not living in 19<sup>th</sup> century, some of the original arguments were power outages. In that case VOIP line is not going to work either, same for an old landline with a battery phone. All guests have cellphones and the public infrastructure depends on those as well. Plus they have a battery that is likely to operate for quite some time, unlike the VOIP/landline.

**Enhance the limit per bedroom to 3 people.** A lot of families have more than 2 kids and they like to stay together. Having multiple families in a single house is the reasons STR exist – they provide better and different experience from hotels where it is 2 per bedroom. (And even in their setups they allow for 3<sup>rd</sup> bed being added.)

Thank you,

Tomas and Lucie Vetrovsky

## Jessica K. Thompson

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**From:** Nick McLean <nick@nickmclean.com>  
**Sent:** Friday, September 6, 2024 8:31 PM  
**To:** CD Comment  
**Subject:** Unintended consequence of limits

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

Chelan County's STR code has artificially increased home values. The code has made an artificial supply limit like a price limit on groceries or results an inflation.

The code was adopted during Covid where the demand was artificially high for STR in Chelan County. By restricting the STRs it made the inventory available to rent lower resulting in higher rental rates. It made owning a rental more feasible and investors willing to pay more to own a rental property.

Now with inflation demand has declined resulting in rental rates going back to a normal rental rate however still too high compared to pre COVID rates.

If STRs were not limited the supply of available units for rent would be even higher resulting in rates regressing back to pre COVID levels or lower. This would force owners to either not rent their unit or put it for sale. The free market would work. There are markets in Florida where home values are declining which is good for buyers and homeownership.

The STR restriction is against primary homeownership in Chelan County. It is against first time homeowners. It is against family formation. It is against affordable housing.

The result is that developers can't develop STR communities or affordable single family homes so they build apartments.

Do we want a community of restrictions, gated communities and apartment complexes?

I strongly recommend lifting the limits for STR permits because of these facts.

**Nick McLean**  
RESIDE | NMREG | M PROP  
C 509.670.1071 (ok to text)

**Nick McLean**  
RESIDE | NMREG | M PROP  
C 509.670.1071 (ok to text)

## Jessica K. Thompson

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**From:** gouldw@charter.net  
**Sent:** Friday, September 6, 2024 11:04 PM  
**To:** CD Comment  
**Subject:** comments on STR code changes

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

September 6, 2024

William Gould STR #000174

5200 Whispering Ridge Dr.

Wenatchee, WA 98801

[gouldw@charter.net](mailto:gouldw@charter.net)

Comments for the Chelan County Planning Commission regarding the revisions to the STR code currently under consideration. Below is a summation of my comments on several issues in the proposed code revisions that directly impact my Tier 2 STR:

### **Excluding infants under 24 months from two-per-bedroom occupancy limit.**

This proposed change is welcomed. I don't believe these infants pose a risk in any way that would lead to complaints by others or create problems with the functionality of our STR.

### **Replacing self-certification with mandatory annual inspections.**

I am not in favor of this change. The requirements are well defined in the self-certification instructions and were explained in detail by the fire marshal during their visit at the beginning of our permit processing. Essentially, once a year inspections by the fire marshal or by others still won't make up for the constant oversight required by the operator of the STR (the real issue here). I suggest requiring an additional onsite inspection by others only if there are observable problems, when requested by the STR owner, or when a new operator is involved.

### **Replacing discretionary hardship exemption for late permit renewal applications with progressive late fees and delayed issuance.**

This is a reasonable solution to an existing problematic issue.

**Signage Rules**

Out of respect to nighttime drivers being distracted, please do not require reflectivity.

**Cleaning up language relating to existing nonconforming STR's**

Please ensure this cleaning up does not adversely impact the operation of existing permitted nonconforming STR's

Sincerely,

William Gould

## Jessica K. Thompson

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**From:** Jeff Layton <laytonjeff@hotmail.com>  
**Sent:** Saturday, September 7, 2024 8:33 AM  
**To:** CD Comment  
**Subject:** Comments on Proposed STR code changes

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

I am writing to voice my opinions to the proposed STR changes by your department. As an STR owners and a full time residents in Plain, my family has an extremely vested interest in this code.

1. **Excluding Infants from occupancy limits** - a most welcome change! Families with babies are exactly the kind of tourists we want to attract. Little kids don't stay up late partying, they don't create extra noise for neighbors and their parents go to bed super early. This also aligns with booking platforms that don't include them in a head count
2. **Changes to Tier 1 to allow on site manager** - Strongly disagree with this one. This is just a work around for vacant owners to profit from our county's tourist dollars. This will flood the unincorporated areas (where we live) with even more STR's and diminish the number of families who are able to afford to live here full time. Keep Tier 1 a true "owner occupied" property because these folks are invested in our community.
3. **Requiring annual life/safety inspections** - This is totally a solution in search of a problem. Noting but added red tape, cost and hassle for STR owners. Do you seriously think STR owners are going to remove smoke detectors and egress windows after they passed their first inspection? Is there any evidence that people are submitting false reports? After passing one inspection, an in-person inspection once every 5 years seems way more reasonable and affordable.
4. **Proof of sales tax paid**- More hassle for owners that is unlikely to achieve anything.

Thank you for your time.

Jeff Layton and Amanda Gatlin

STR owners and residents of Plain, WA



## Jessica K. Thompson

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**From:** Kathy Branch <kathy.branch@gmail.com>  
**Sent:** Saturday, September 7, 2024 12:07 PM  
**To:** CD Comment  
**Subject:** STR Proposed Code Changes

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

Dear BOCC Members,

I am a resident of Manson. I live in the old neighborhood just above Manson Bay; I am a year round resident. I restored an old home and appreciated the community and small village feeling.

Soon after spending a year to restore this property the surge of vacation rentals occurred. Suddenly, my neighborhood became unlivable. The noise, overstuffed houses, cars and boats made this a party ghetto.

I was so relieved when, after writing letters to the County and getting no help, others joined in from around the county to help us all get to an agreement we could live with. Those code changes have made it possible for me to continue living in my home.

I am dismayed to think that the County would consider removing the caps on STRs... we have a housing crisis already!

It seems incredibly short sighted to me that to allow more of our housing inventory to go to outside investors only serves to further inflate housing prices out of the reach of citizens who actually live here.

Also, perhaps you should consider the small businesses here that already cannot get employees because there is nowhere for them to live.

Sincerely,  
Kathy Branch  
25 Ustah St  
Manson

[a.kathryn.branch](mailto:a.kathryn.branch)

**Jessica K. Thompson**

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**From:** Mark Stoddard <mdstoddard1@gmail.com>  
**Sent:** Sunday, September 8, 2024 8:34 AM  
**To:** CD Comment  
**Subject:** STR Code Changes

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

As a STR (Tier 1) owner in Leavenworth area there are 2 proposed changes which will be another undue burden on STR owner/operators. Following are my comments:

- **Replacing self-certification with mandatory annual inspections.**

I oppose this as it will impose significant time and monetary costs on owners with little benefit. There is no evidence that there is currently a problem with false reporting or safety issues. Homeowners, STR operators, and insurance companies are well aware of liabilities and are adequately incentivized to address issues in self-certification.

- **Requiring proof of paying sales tax and lodging tax annually at time of renewal.**

I oppose this as this change is unlikely to achieve any real benefit, but it imposes compliance costs on operators. Most STR bookings are made through platforms such as VRBO and Airbnb, which collect and remit sales and lodging taxes on behalf of operators. The Department of Revenue already requires quarterly reporting, so why does the county require even more? Requiring documentation of taxes paid will force owners to compile documentation from across multiple platforms, but is unlikely to increase tax collections. The Department of Revenue is competent to ensure collection of sales and lodging taxes, and enforcement is best left to them.

Thanks,  
Mark Stoddard

## Jessica K. Thompson

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**From:** Stargazer Lane <info@stargazerlane.com>  
**Sent:** Sunday, September 8, 2024 10:10 AM  
**To:** CD Comment  
**Subject:** STR Changes

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

Hello,

Below are my opinions on a few upcoming points:

3(B)(i)(b) p.30 & 3(B)(ii)(b) p.30 -- I think that excluding infants under 24 months as occupants is a GREAT idea.

4 (H) P.40 -- I think this would be a scheduling nightmare for fire marshals and managers/owner. Maybe if someone had an infraction they should be required to do this for a few years?

3(O) p. 35 -- I think this would not be a good idea, as the platforms are very good at automating this task and it would be hard to skate around it if someone were trying to be dishonest.

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Thank you,  
**Ron Sievers**

## Jessica K. Thompson

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**From:** Scott Huson <scott.huson@gmail.com>  
**Sent:** Sunday, September 8, 2024 1:47 PM  
**To:** CD Comment  
**Subject:** Comments for The Record on proposed STR code changes

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

Dear commissioners,

Thank you for the opportunity to comment on proposed changes to the STR code. As an STR owner, I am writing to express agreement with the comments made in the letter sent by the STRACC board on August 27th 2024, with one exception - the proposed change by the STRACC board for a countywide cap.

I believe that the current cap system by Zip code is a more effective way to ensure a sensible distribution of STRs in the county. It provides more fidelity in how the county can manage distribution of STRs and a sharper tool with which to manage overall tourism in the county in line with the WA Growth Management Act. A change to a county-wide approach would mean that the areas that are currently well over the caps (e.g. Leavenworth) would immediately suck up all of the available STR permits in the county, which would be unfair to those areas that are outside of the main tourist hubs. These play an effective role in lessening the burden on areas that are arguably over capacity when it comes to tourism. While I can see the logic of the proposed move to a countywide cap from the point of view of the big STR management companies and owners/would-be-owners in the big tourist towns, it makes little sense from an overall perspective for either STR owners and tourists or the people of Chelan County.

With respect to all other comments by the STRACC board, I am in full support. Especially the change to disregard infants under 2 from the occupancy numbers, a move to burdensome annual inspections and more expensive signs.

Sincerely

Scott Huson

## Jessica K. Thompson

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**From:** Kelly kraus <kellykraus21@gmail.com>  
**Sent:** Sunday, September 8, 2024 2:48 PM  
**To:** CD Comment; Mark Kraus; Michelle Engeseth  
**Subject:** STR permit changes comments

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

Dear Board,

We own a second home with is an STR at 9138 Icicle Road in Leavenworth. Following are my comments on the proposed changes to the STR Permit code.

I oppose replacing self-certification with mandatory annual inspections. We are honest and abide by the code and this would cost undue additional cost and hardship.

I oppose requiring proof of paying sales tax and lodging taxes at the time of permit renewal. We work with an excellent professional property manager and our STR is rented through the major rental sites such as AirBnB and VRBO and they all handle paying the taxes as required by law. Having to collect that information from all the sites would be a burden and not increase tax revenue.

Thank you much for your consideration,  
Kelly Kraus  
206-909-8827

## Jessica K. Thompson

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**From:** Carol Odom <carolodom3@gmail.com>  
**Sent:** Sunday, September 8, 2024 4:33 PM  
**To:** CD Comment  
**Subject:** STR proposed changes

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

Thank you for considering adjustments to the code. Some of the regulations don't make sense in relation to what they were trying to accomplish.

### 1. Parking

- a. 1 parking spot per bedroom (per 2 guests) doesn't make sense. Families are not bringing multiple cars. Children are obviously not driving. When singles come, they are told that they need to carpool. Before the code, we never allowed our guests to bring more than 4 cars even when we had 12 guests.
- b. Until the code, we had a side yard parking space. When the code went into effect, we suddenly were no longer able to count that parking spot because we were 5 inches in the setback. Not using the spot wasn't the biggest problem, but since that spot was 5 inches into the setback, we then lost 2 occupants.
- c. We have a large 3100 sq foot home. 80% of our guests bring 2-3 cars. They are told before we accept their reservation, that they may not bring more than 4 cars and this includes boat trailers. We should be able to put a cap on how many cars we allow our guests to bring without it being dependent on having 1 "legal" spot per bedroom.

### 2. Infants

- a. Families with infants are the BEST guests. They are quiet, they go to bed early, they are inside early because they have put the little one's to bed.
- b. Kids under 2 don't make noise, do not contribute to parking, do not party and do not create garbage issues.
- c. Kids under 2 are sleeping in their parent's room in a porta crib. They are not using their own bedroom.
- d. We have had to turn down several family groups this past 2 years due to them having an infant which then puts them over our limit. Our typical family groups seem to be extended families. We are seeing most groups include grandma and grandpa as well. We need to be able to host this kind of a group with allowing them to bring their little ones.
- e. Airbnb and VRBO don't recognize this rule of counting infants. This creates another problem of people renting and then by the time they are signing our contract, they realize they must count the infants. This then creates a mess in the reservation and us having to go back and cancel it and refunding money, etc.
- f. I don't think that the group against this understands that they are fighting against having the best renter groups who are in this category.

### 3. Signs

- a. Many of us spent money getting a professional sign to meet all the new sign stipulations. The people who followed your requirements for their sign shouldn't be penalized because some apparently chose not to do so. To now have to start over and now come up with a "reflective" sign when that wasn't a requirement seems unnecessary. If our sign is the right size, and is positioned where everyone in the area can see it, how is a "reflective" sign going to help? It is only going to be reflective if car headlights shine on it. Our sign is visible to our neighbors and anyone who drives by. I am hoping not to have to pay again for a new professional sign.

### 4. Cap

- a. We are in the Manson UGA. We already had a permit before the code came about. We were then penalized and only given 3 years to sell our property when everyone else has a 5-year limit. Now, not



only are we still at a 3 year limit, but having the MCC try to come in and change the cap is unreasonable. If the cap get's lowered, then the 5-year time span to sell should also be implemented.

Thank you for all your hard work in trying to make adjustments where they are needed.

Carol Odom  
14 Ustah Street, Manson

## Jessica K. Thompson

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**From:** klunder@kumitskoos.com  
**Sent:** Sunday, September 8, 2024 7:53 PM  
**To:** CD Comment  
**Subject:** Comments on proposed changes to STR code

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

Dear Commissioners,

Thank you for providing this opportunity to comment on proposed changes to the Short Term Rental (STR) Code.

For roughly the past ten years, I have been the owner of a cabin used as a short term rental. The cabin was built roughly thirty years ago, was designed specifically as a vacation rental, and has been operated that way for its entire history (i.e., by the previous owners as well as me). To the best of my knowledge, there have been no problems with any neighbors during that entire history--certainly not since I acquired it. All of which is a long way of saying that I and my property have a demonstrated history of being useful parts of the Chelan County community, and providing significant tax revenues to the County.

This is, of course, far from a unique situation. The vast majority of current STR owners, registered and permitted, take their responsibilities as community members seriously. We provide a valuable service to the County, paying taxes and enabling a vibrant and responsible tourist economy without harming other members of the community.

With that as background, I would like to express my support of the comments provided by the Short Term Rental Alliance of Chelan County (STRACC). In addition, I offer these further thoughts:

### **Owner Occupation**

The proposed changes to section (3)(A)(ii) appear to require *all* STRs to be owner-occupied. I hope this is an administrative error, and is instead intended to apply solely to Tier 1 STRs—otherwise it undermines the entire tier scheme, and will instantly cause many owners, including me, to be out of compliance.

### **Existing Nonconforming STRs**

Numerous sections of the code dealing with existing nonconforming STRs are proposed to be deleted. I understand and applaud the desire to simplify the code, and recognize that many of those sections no longer have meaning after a couple of years of permitted operation. Nonetheless, I am uneasy about the overall effect of the deletions, and how the remainder of the code will be applied to existing nonconforming STRs. It would be beneficial for all concerned if a simple statement could be added clarifying that existing nonconforming STRs remain legal, and can continue operations (including renewing permits) as long as they continue to follow the existing rules.

### **Transfer of STRs**

Section (4)(l) entirely prohibits the transfer of permits for conforming STRs, and allows transfer only once and only until 9-27-26 for existing nonconforming STRs. I urge the Commission to reconsider this provision and eliminate it. The current restrictions are counterproductive, and undermine the responsible operation of STRs. As even many STR opponents recognize, the existing code has effectively weeded out most of the bad actors in the STR community. There are significantly fewer STRs operating today than prior to the adoption of the code, and the remaining owners are the

responsible ones that have gone through the necessary hurdles to prove that in order to obtain permits. In other words, the current owners of existing nonconforming STRs have a proven record of responsible ownership.

Unfortunately, many of us are now faced with a difficult choice. We either need to sell our properties in the next two years, or face obtaining a significantly lower sale price in the future when the property will not be able to transfer as an STR. This is particularly of concern for properties—such as mine—designed and built specifically as vacation rentals, lacking basic amenities (such as closets) that are considered standard for long term residences. But we are not the only ones affected; so are owners who for a variety of reasons (e.g., retirement) would ideally intend to sell in a medium timeframe, and now are strongly incentivized to instead sell in a very short timeframe instead. The upshot is that the County could easily be facing significant turnover in existing STR units in the next two years, replacing owners with a proven history of responsibility with new owners who may or may not be equally responsible.

Looking beyond two years, a different dynamic emerges, which is equally counterproductive. At that point, all STR owners will have a strong incentive to continue operation as an STR, and not to sell their property, since the likely value that could be obtained in a sale is less than the “true” value of the property when operated as an STR. Even if this expected value turns out not to be true, few owners will take the risk, since simply placing a property on the market has significant costs to an STR operator—if a new owner cannot continue to operate it as an STR, all existing future reservations must be cancelled, creating considerable ill will among guests. The upshot is that fewer properties being used as an STR will come onto the market, limiting the opportunities for those who in fact wish the opportunity to buy properties for personal use.

In summary, the existing restrictions on transfers of STRs have significant effects that are counterproductive to the purposes of the STR code as a whole. On the other hand, there is no need for the restrictions, since the current operation of STRs under the code is working well, and transfers of STRs would not increase the number of STRs in operation. I therefore strongly urge the Commission to delete section (4)(l) and allow transfer of STR permits to new owners, allowing smooth continuity in operation of an existing STR.

Thank you for the consideration of these comments.

Doug Klunder  
Owner of Kumitskoos Cabin, 12344 Bretz Rd, Plain, WA 98826.

## Jessica K. Thompson

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**From:** Snowgrass Lodge <snowgrasslodge@gmail.com>  
**Sent:** Monday, September 9, 2024 12:24 AM  
**To:** CD Comment  
**Subject:** Public Comment on STR Amendments

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

Dear BoCC and Planning Commission,

I'm writing to submit my public comments on the proposed STR amendments from my perspective as an STR owner and Leavenworth resident:

### I SUPPORT

- Applying the 6% cap on STR percentages at the countywide level instead of by specific zip code and subareas, to balance the fact that much of the county is way under the cap whereas 98826 subareas are over and thus unable to add new STRs. This would help boost the tourism economy in the 98826 subareas and regain the lodging taxes and tourism-related revenues that have been lost there since the code was enacted. The risk is minimal since the code enforcement evidence shows that there have been very few STR nuisance complaints in those areas.
- Excluding infants under 24 months from nighttime occupancy limits for all Tiers. This would encourage more STR tourism from families which tend to generate fewer nuisances (less noise, partying etc). Infants also have limited impacted on septic systems, parking etc.
- Change Tier 1 to allow STR owners to have a manager/operator living onsite instead of having to themselves. This would create opportunities for affordable long-term rental which could address the affordable housing problem especially in the Leavenworth area.

### I DO NOT SUPPORT:

- Eliminating the self-certification checklist and instead requiring annual inspections. This would create unnecessary logistical headaches (scheduling inspections), money (fees) and time for STR owners without evidence that there's any problem with the existing process. Just feels like a money grab by the county.
- Requiring proof of paid sales and lodging taxes provided annually at time of renewal. This would another red-tape headache for STR owners to compile this documentation from every platform they list on without any real benefit to the County.
- The requirement that signage be permanent, weatherproof and reflective. STR operators have already spent hundreds of dollars on new signage since the code was adopted. Changing the requirements now will require them to spend even more to replace functional signs.

Sincerely,  
Hernan Savastano & Angela Sucich  
Snowgrass Lodge

## Jessica K. Thompson

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**From:** Fran Horn <fran@resortvacationrentals.com>  
**Sent:** Monday, September 9, 2024 6:22 AM  
**To:** CD Comment  
**Subject:** STR Changes

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

As a property manager and neighbor to a STR I currently feel things are working out pretty well. The listed changes all seem to minor housekeeping issues to the original code. The only change I do questions some, but understand the reason for it is the under 24 months does not count. Yes, likely to stay in the same bedroom/bed as parents and booking agencies do not count them in their booking process to actual occupancy levels. From a housekeeping side of things these tend to be some of the messier issues for us to deal with. More food on the floors and finger prints on every door/window/item that they can reach. I do have to say overall renters are returning to pre Covid care of homes, I have actually considered getting out of the business because of the nastiness of renters over the past 4 years. This year has been much more normal.

I know the rules did eliminate a few STR's but it did not stop people from coming here. I know some are saying it is but I had homes sitting vacant over this past summer for a few weeks. People are just getting out and traveling further than they could a few years back. I also think some are a little tired of the area, as they came repeatedly during covid to get out of their own homes when everything was online.

The one thing I did not see is parking spaces, if you cater to family vacations and two families come with their children, they only need 2 car spaces, one for each family but could easily be a total of 8 people in a 4-bedroom home. Think this rule could be modified to 1 space for every 1.5 bedroom or 2 bedrooms. All my properties make it very clear on the number of cars that are allowed at the property and sometimes that means they have to park off site if it is not a family and we advise them options of places to park that are not at the neighbors.

Thank you,

Fran Horn  
Resort Vacation Rentals  
www.resortvacationrentals.com  
503/698-6839 or 509/687-9549