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**TO:** Planning Commission

**FROM:** Leslie Hamilton, Senior Planner

**SUBJECT:** Short-Term Rentals – Work Session (LU 18-0034)

**DATE:** June 14, 2018                      **MEETING DATE:** June 25, 2018

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### **ACTION**

Provide input to staff on a work plan for Lake Oswego Code (LOC) amendments concerning Short-Term Rentals (STRs).

### **BACKGROUND**

Short-term rentals of dwellings (i.e., rentals of less than 30 days) are currently prohibited in Lake Oswego’s residential areas. On April 17, 2018, the City Council directed the Planning Commission to recommend development code changes applicable to STRs should they be allowed on a limited bases in neighborhoods. The code changes would be temporary, as the Council directed that a “sunset” clause be included that would require an evaluation after a certain period of time, and reauthorization by the City Council would be required before STRs could continue.

At the direction of Council in 2017, the Planning Commission reviewed STRs to begin identifying the land use concerns that should be addressed if the City were to allow STRs in residential areas. Staff recommends that the Commission review Attachments A and B for background on definitions and areas of concern for STRs, and for a summary of the interests and concerns raised at the Planning Commission work session in May of 2017.

### **WORK PROGRAM**

Staff has developed a draft process and timeline for the Commission’s review of STRs (Attachment C). Staff recommends two work sessions this summer to review and gather input on the areas of concern identified by the Council in April, followed by the distribution of a Public Review Draft in September. A Planning Commission public hearing could be scheduled in November of 2018.

Staff requests feedback from the Commission on the proposed work plan and schedule, as well as recommendations from the Commission as to specific research or analysis for staff to include in the two summer Work Sessions.

Staff is developing a list of STR interested parties, including those who have asked to participate in the June 25 Planning Commission work session. (A list of presenters will be available at the meeting.) Other citizens may address the Commission on the 25<sup>th</sup> as time allows. Importantly, the proposed work plan provides more opportunities for public input as the Commission reviews options and drafts code language in subsequent meetings.

#### **ATTACHMENTS**

- A. Planning Commission Staff Memo with Attachment, 04/27/17 (for 05/08/17 Work Session)
- B. Council Report on Short-Term Rentals without Attachments\*, 04/06/18 (for 04/17/18 Study Session)  
*\*Attachments to this report are not included due to the size, they are available on the land use webpage, see link below.*
- C. Draft Process and Timeline, 06/13/18

Staff reports/memos and public meeting materials can be found by visiting the project webpage. Use the link below to visit the City's "Project" page.

<http://www.ci.oswego.or.us/projects>

In the "Search" box enter **LU 18-0034** then press "Submit"



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**TO:** Planning Commission

**FROM:** Sarah Selden, Senior Planner  
Planning and Building Services

**SUBJECT:** Short Term Rentals Work Session #1 (PP 17-0004)

**DATE:** April 27, 2017 **MEETING DATE:** May 8, 2017

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### **ACTION**

During the 2017 Planning Commission goal-setting process, comments were submitted encouraging the City to permit short-term rentals, and the City Council then directed the Planning Commission to develop standards for this use in Lake Oswego.

The purpose of Work Session #1 is to review background on short-term rentals and for the Planning Commission to provide initial input to City Council on the scope of potential land use regulations addressing this use in residential zones. The City Council is scheduled to hold a study session on the topic June 20 where staff will seek direction regarding any code amendment to be brought forward.

### **BACKGROUND**

In Lake Oswego, short-term rental of rooms or homes to overnight guests is permitted only as a hotel or motel use, which is allowed in five of the city's commercial and mixed-use zones (GC, HC, EC, MC and FMU). The use is not allowed in residential zones. The definition of "Hotel" in the Transient Lodging Tax section of the City Code (LOC 24.02) includes any transient occupancy of less than 30 days:

**"Hotel** - means any structure or any portion of any structure which is occupied or intended or designed for transient occupancy for thirty (30) days or less for dwelling, lodging, or sleeping purposes. This includes any hotel, inn, tourist home or house, motel, studio hotel, bed and breakfast, bachelor hotel, lodging house, rooming house, apartment house, public or private dormitory, public or private club, and also means space in mobile home or trailer parks, or similar structure or space so occupied, provided such occupancy is for less than a thirty (30) day period."

In the last decade, the market for short-term rentals (STRs) has grown, led by the online platform Airbnb, which provides an advertising and booking platform for residents and homeowners to rent their entire home or room/s within their homes. In response, cities have amended their codes to mitigate the impacts of STRs on neighborhood livability, housing, and other concerns.

## **DISCUSSION**

### **About Short-Term Rentals**

Hosts of STRs are motivated to share their home for a variety of reasons, from providing supplemental income to support mortgage/rent payments or pay for travel costs while away, to providing companionship and the pleasure of hosting guests. Renting a home or room short-term provides hosts with flexibility to use their homes and have guests on a very limited basis, and to set rental dates around personal schedules. For guests, staying in short-term rentals typically provides an opportunity to stay in residential neighborhoods and experience cities from a local perspective. Airbnb notes that 90% of their listing are outside of hotel corridors. Staying in a STR can be an attractive alternative to hotels for long vacations, visiting family, relocating, medical-related stays, or extended business travel. They can also provide additional space desirable for families or groups, opportunities for lower cost travel accommodation, and for interaction with hosts enthusiastic to share their home and city.

#### Entire home vs. room rentals

Short-term rentals can be divided into two main categories. Entire home rentals, also called vacation homes, are rented out in their entirety while the primary resident is either off-site or staying in another dwelling unit on the property (e.g. rental of a detached accessory dwelling unit while still residing in the primary dwelling). These may include detached single-family homes, apartments, condos, or even houseboats. The owner or primary resident may rent the home while traveling or residing in a secondary location of residence, as a full-time vacation rental, or in the case of renting an accessory dwelling unit, as a source of income.

Private short-term room rentals, also called home sharing, are the rental of one or more rooms in a dwelling while the primary resident is on-site. This category of STRs have flourished through the Airbnb platform as a way for people to offset housing costs, host travelers, and share unused space. On Airbnb, room rentals are differentiated between a private sleeping room with some shared common space (such as shared kitchen), and a shared sleeping room such as a bunk room.

#### Lake Oswego STRs

In Lake Oswego, code enforcement occurs on a complaint-based system, and the City has received very limited requests for enforcement of short-term rentals. While the City has become aware that STRs exist in the community, it has not sought out listings. Airbnb is the online platform with the majority of local listings, and has shared the following summary data on its listings as of April 1, 2017:

- **Active Hosts:** 72
- **Inbound Guests:** 3,000
- **Nights Rented for Typical Listing:** 64
- **Typical Host Earnings:** \$8,500
- **Host Demographics:** Avg. Age: 49; 76% women
- **Type of Accommodation:** 2/3 "entire home" v 1/3 "private room"
- **Guest Demographics:** Avg. Age: 41, Avg. Group Size: 2.4, Avg. Stay: 5 nights
- **Outbound Guests:** 2,000

Other online platforms are VRBO, HomeAway, and VacationRentals.com, which are partner websites all owned by Expedia, specializing in entire home vacation rentals and which have a smaller number of local listings. It is also common for hosts to advertise through multiple online platforms, and there may be crossover with Airbnb listings.

### **Regulatory Components**

Cities use a variety of approaches to address livability, licensing and taxation of STR activity. Below is brief overview of potential impacts from STRs, and typical strategies for addressing them. Staff is seeking the Planning Commission's input on the types of impacts that would be of greatest concern to Lake Oswego. Following additional direction from City Council, staff will return with options for addressing STRs through amendments to the Community Development Code (CDC). Other regulations may need to be formulated, as well, to address licensing and taxation, however these would fall outside the Planning Commission's purview.

#### Impacts Addressed by Development Code Standards

Short-Term Rentals by definition have shorter "stays" or tenancy than houses that may operate as rental properties (for 30 days or longer). This increased activity from people arriving and departing, even if not moving their belongings into the house, can be disruptive to neighborhood livability, and may raise concerns such as noise, parking, crime, and housing supply/affordability for residents, particularly in cities with high levels of tourism and a significant share of housing units used for vacation rental properties. Land use regulations are one way of addressing these concerns.

Some cities have adopted land use regulations for STRs that limit the zones where the use is permitted. Others have established standards, such as a cap on the number of STRs, or minimum spacing between STRs, either citywide or by zone, to address the above concerns. Land use codes may also differentiate between entire-home vs. room rentals, or require that STRs be "accessory" to a permitted residential use, to help ensure consistency with the purpose of residential zones.

The process for "permitting" STRs could be as simple as allowing them by right subject to use-specific standards (and approval of a business license), similar to how home occupations are allowed now. However, if it was not possible to formulate regulations that could be applied through a ministerial process, the minor development procedure would be used. It should be

noted that Airbnb and other companies use online “reviews” and provide other means for customers to report problems with rentals; in this way, some aspects of the STR are “self-regulating.”

#### Impacts Addressed by Business Licensing

A business licensing process may also be developed for STRs. Requirements may be implemented through the business license process to address non-land use concerns such as availability of contact information and listing numbers, fire safety or trash collection certification. Business licenses must be renewed annually.

#### Lodging Tax

One of the Council’s interests in regulating STRs is to capture opportunities for transient tax revenue where lodging is permitted. Short-term rentals contribute to the local economy but also benefit from local expenditures on tourism promotion. In July 2015, a new State rule went into effect that requires transient lodging intermediaries or online travel companies that collect fees (such as Airbnb) to collect, remit and report state and local lodging taxes. While Airbnb is currently collecting and remitting the 1.8% State tax for rentals in Lake Oswego, the City is not collecting the local 6% transient lodging tax for these listings, as it does for hotels. The local hotel industry has noted their desire to have an equal playing field with regard to transient lodging in the city. The City may explore mechanisms to collect this lodging tax on STRs, such as through a voluntary collection agreement with Airbnb or partnership with Clackamas County.

### **CONCLUSION**

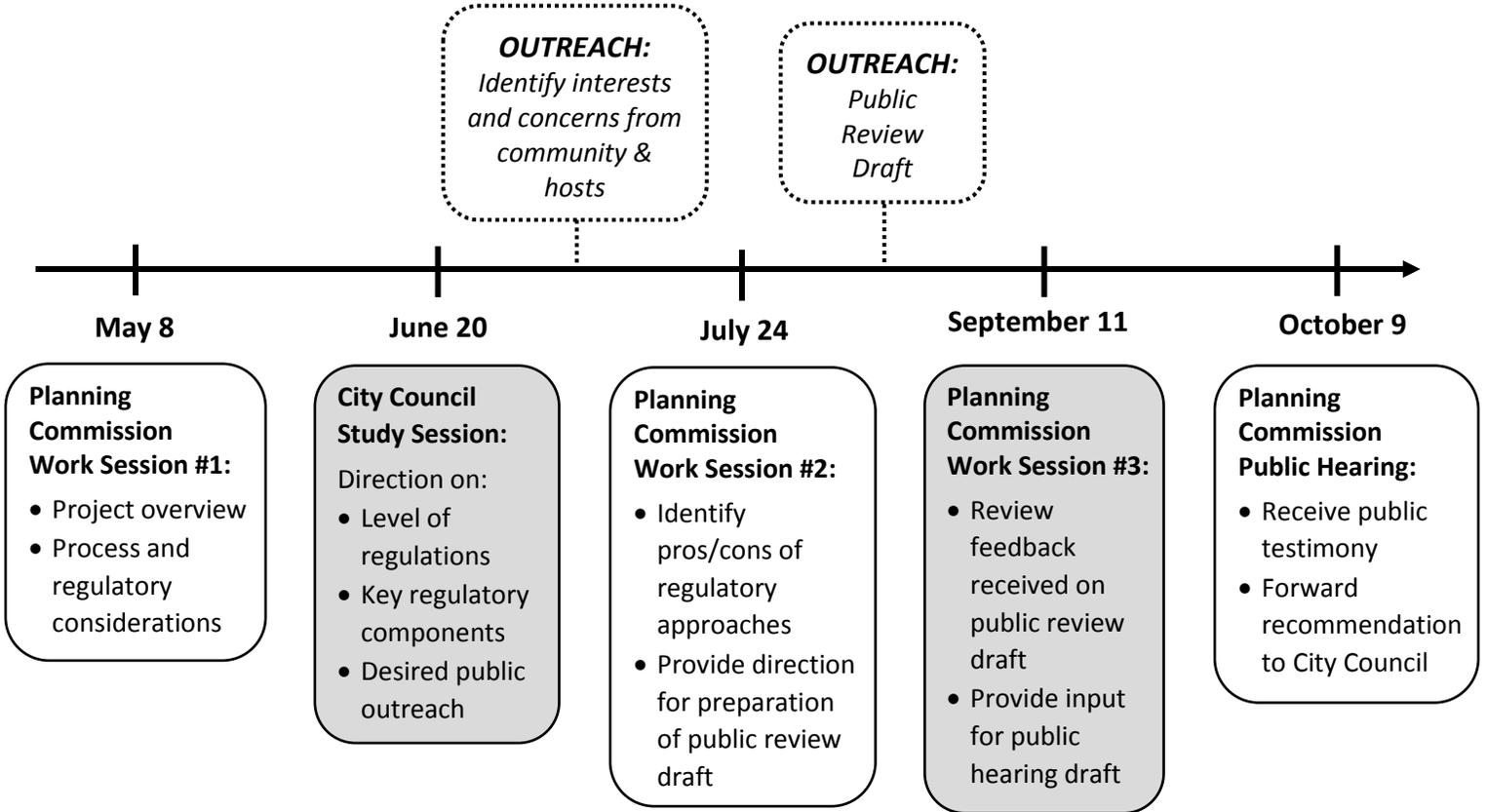
Staff requests that the Commission identify key issues or concerns related to short-term rentals that should be brought to the City Council, for Council’s June 20 study session. The Commission may also wish to identify information that would be helpful for its next work session, July 24, and provide input on public outreach (see Attachment 1).

### **ATTACHMENTS**

1. Draft Process and Timeline

# Draft Process and Timeline

## Short-Term Rental Regulations Project







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**TO:** Kent Studebaker, Mayor  
Members of the City Council

**FROM:** Scot Siegel, Planning and Building Services Director  
Bill Youngblood, Code Enforcement Specialist

**SUBJECT:** SHORT-TERM RENTALS

**DATE:** April 6, 2018      **MEETING DATE:** April 17, 2018

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## **ACTION**

Provide direction to staff regarding options, if any, for allowing certain types of Short-Term Rentals in residential zones and establishing business license requirements for the same.

## **BACKGROUND**

The City Council previously considered whether to amend city code to allow Short-Term Rentals (STRs) when it met on June 20, 2017, but decided to maintain the present prohibition citing concerns about neighborhood livability (security, parking, parties, property upkeep, host communication with neighbors, etc.), building safety, property values, and parity with other types of lodging.<sup>1</sup> Some councilmembers acknowledged that these concerns were not uniform across all types of STRs, and where an owner or host lives on the premises the use may have less impact than if the owner lives elsewhere. However, the consensus was to maintain the prohibition, and on July 18, 2017 Council directed staff to proactively enforce the code.<sup>2</sup>

“Short-Term Rental” (“STR”) for purposes of discussion is a dwelling or portion thereof that is rented for a period of less than 30 days; see also, LOC 24.02.010 Transient Lodging Tax. These uses are prohibited in residential zones. The development code [LOC 50.03.002 Use Table] does not contain a use classification for short-term rentals or bed and breakfast inns; the code classifies all types of transient lodging as Hotels, which are allowed only in commercial zones. For more detail, refer to the June 20, 2017 and July 18, 2017 Council Study Session on STRs.

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<sup>1</sup> See the [City Council Report](#) from the June 20, 2017 Study Session.

<sup>2</sup> See [City Council Report](#) from the July 18, 2017 Study Session.

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## DISCUSSION

During Council goalsetting this year, the Council directed staff to conduct further research on STRs as it may reconsider whether some types of STRs should be allowed. Staff has researched the makeup of illegal STRs known to exist in Lake Oswego and compiled the attached articles and data.

In summary, short-term rentals range from the rental of a single bedroom, to several bedrooms, to an entire apartment or house. A rental unit may be internal to the primary dwelling or in a separate structure. Where houses or accessory structures have been converted to accommodate an illegal rental, the remodel or conversion itself may be in violation of building codes. Additionally, if an STR has its own kitchen and bathroom it may constitute a secondary dwelling unit. The level of on-site management and supervision of these properties also varies. For example, where the owner/host is not onsite during the rental, and the property is not the owner's primary residence, there may be greater potential for problems relating to security, parking, and property upkeep, among other concerns.

In January staff interviewed councilmembers to ascertain key issues, options, and data needs for a study session on STRs. Staff also began gathering more detailed data on STRs operating illegally in Lake Oswego to assist with enforcement and to support the policy discussion. Over the past month, staff has collected data on STRs in Lake Oswego using the services of a software firm that tracks online rental listings. Although it is too early to derive any trends from the data, the service has proven helpful in identifying the locations and various attributes of STRs operating illegally in Lake Oswego.

### **Summary of Research on Existing STRs in Lake Oswego**

At the time of publication of this report, there were 32 confirmed STR listings within the City limits, and another 24 listings requiring verification. (See **Attachments 1 and 2.**) This is less than originally observed because some of the original listings were duplicates (listing appeared on more than one platform), some listings have been removed, and others have shifted to long-term (30-day) rentals. Verification of some listings is still needed to determine if they are inside the city limits and whether they are duplicate listings.

The software has allowed for a finer-grained look at the listings, including physical location, type of listing (whole or partial house, or secondary dwelling unit), minimum stay, maximum number of occupants, rental rate, owner address (inside/outside City) and other attributes, which will be shared on April 17.

Staff has also gathered articles on various aspects of STRs. These articles are contained in **Attachment 3.**

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Some initial observations from the research follow. A data summary table and map are attached:

1. 32 confirmed listings within the city limits, as of March 28, 2018. If the City legalizes STRs, the number would likely increase, particularly during the spring and summer.
2. 22 listings are whole-house and 10 were partial house rentals.  
*Staff is still discerning the number of STRs that are in secondary dwelling units (a subset of "partial house").*
3. 11 (34%) of the "hosts" were not the property owner.
4. 5 (15%) of the property owners lived outside of the City limits, with 3 (9%) living outside of Oregon.
5. Listings are distributed throughout the city though concentrated in First Addition-Forest Hills. See attached map.
6. The minimum stay per visit ranged from 1 to 29 nights, with a median minimum stay of 5 nights.
7. The maximum number of guests ranged from 1 to 10 guests, with a median of 5 guests.
8. The rent per night ranged from \$29 to \$999, with a median rent of \$132.
9. The City transient lodging tax foregone from a median stay in March 2018, based on the median rent, is estimated at \$39 (5 night median stay x \$132 median rent x 6% tax).

If extrapolated over 32 rental properties, for one year, assuming the median rent and 20% occupancy (73 nights annually), tax revenue foregone is estimated at \$18,500 (73 nights x 32 units x \$132 median rent x 6% tax). Again, this may be a conservative estimate because if STRs were legalized the number would likely increase.<sup>3</sup>

### Summary National Trends

Short-term rentals are addressed in a variety of ways across the United States, and the industry is changing rapidly, so there is no model ordinance for regulating STRs. It is also difficult to identify communities similar to Lake Oswego for benchmarking purposes. Approaches to

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<sup>3</sup> The City of Lake Oswego collects a 6% Transient Lodging Tax - of which 1.4% goes directly into the Tourism Fund revenue. The tax is charged on overnight stays in the City. Lodging providers are responsible for collecting the tax, and may keep 5 percent of the collections to cover their costs of administration.

regulation vary based on a community's location, economic base (e.g., reliance on tourism), and social and economic concerns.

Some cities have maintained an outright ban on STRs (Carmel, CA), or only allow "home-sharing" where at least one primary resident is onsite during the rental (Santa Monica, CA). Others allow STRs more broadly (Cannon Beach, Lincoln City, Bend, Portland) subject to limits on the location or total number of rentals, which are unique to each community. In general, we have observed the following patterns:

**Cities generally define "short-term rental" or transient lodging as accommodations for 30 days or less, or less than 30 days.** Some cities also regulate the total number of days per year a property may be rented.

**The level of rental property supervision varies.** Many cities do not specify that the owner be onsite during the short-term rental. Others require the host to be present during the time of the rental, and some cities specifically require a primary resident or owner to be present, as in a "home-sharing" situation.

**Jurisdictions vary in how much of a house may be rented short-term and considered an "accessory use."** For example, the City of Portland permits Type A Accessory Short-Term Rentals, where the resident lives on the premises and rents no more than 2 bedrooms to overnight guests. Neighborhood notice and a safety inspection are required for a permit. A conditional use permit is required if the resident rents between 3 and 5 bedrooms to overnight guests, along with the same site inspection or self-certification of safety features. Anything larger is regulated as a commercial use.

**Most cities employ complaint-based enforcement.** Generally, few cities have instituted proactive enforcement. These cities typically do not allow STRs and have a problem with illegal conversions, which may pose safety concerns. We have also heard anecdotally that cities do not have enough staff and/or are not charging enough for permits to cover staff labor for routine inspections or proactive enforcement. Some communities that prohibit STRs yet have an ongoing problem with violations contract out enforcement services (Carmel, CA).

**Permits or business licenses are typically required to facilitate enforcement, perform health and life safety inspections, and allow for the collection of transient lodging taxes.** Inspections may be limited to the initial permit or license establishing the use, or may be required annually as licenses are renewed.

**There is no consistent practice in requiring inspections.** For one- and two-family dwellings cities typically do not perform routine inspections; for example when a property is sold or long-term tenants change, there is no safety inspection of houses. The City of Portland was requiring city-inspection of STRs for fire and life-safety requirements (egress, fire/smoke/carbon monoxide detectors, etc.), but recently agreed in a legal settlement with Airbnb that it would shift to a process of self-certification by owners/hosts that code requirements are met.

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**Policy issues for Council consideration include:****1. Administration and Enforcement**

If the code is amended to allow STRs, the City will still have to enforce the code where rentals are operating illegally. It will also need to collect transient lodging taxes. Other jurisdictions have found that compared to traditional hotels, code enforcement and tax collection can be difficult with STRs. How will the City communicate the new regulations? How will a new program be staffed?

The Oregon House approved HB 4120 in February. The bill requires that all intermediary websites are responsible for collecting state and local hotel taxes on overnight room rentals, if they collect rent on behalf of the owner or receive any fee or commission for the rental. The bill also requires that the full room price, not the price after subtracting service and cleaning fees, be the basis for hotel taxes. Many questions remain regarding administration and enforcement of this law if approved by the Senate.

**2. Housing**

Allowing whole-house STRs may impact the supply of economical housing, such as small houses and secondary dwelling units that could otherwise provide rental housing, if these units remain on the STR market for an extended timeframe. Staff has found that most of the STR listings are in older houses, though some are in recently constructed houses that would not be affordable to households earning at or below the area's median income. However, some STRs are in "apartments", which may be a living space within a house or an illegal secondary dwelling unit that if legalized could provide an economical, long-term rental. See **Attachment 2**.

**3. Neighborhood Character**

Of the few complaints the City receives about STRs, most are concerned with security and residents not knowing who is coming and going in the neighborhood.<sup>4</sup> Parking, pets and noise are also mentioned as concerns. Legalizing STRs, even with appropriate controls in place, could lead to more complaints, some of which are concrete and can be regulated (parking, number of guests, etc.), while others are more ambiguous and may not be unique to STRs ("I don't know my neighbors. They arrive and depart at all hours.")

A question for Council is which impacts are we most concerned about, and can the City establish reasonable regulations? For example, security, property upkeep, and parties, etc., may be a more significant concern where the owner/host does not live on the premises and there is no clear line of communication between host and neighbors, or host and city. On the other hand, concerns about inadequate parking can be addressed by requiring a

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<sup>4</sup> During the past twelve months, the City has received 7 complaints about STRs resulting in code enforcement and prosecuted one violation in municipal court.

minimum number of off-street parking spaces per bedroom (relatively easy to enforce) and/or limiting the number of guests per STR (more difficult to enforce).<sup>5</sup> The scope of these and other neighborhood concerns would become clearer as the City conducts public outreach prior to drafting any code amendments.

#### 4. Building Safety

Anecdotally we have heard horror stories about illegal remodels, mostly in tourism-based communities, where garages, basements, lofts, and even yurts and tree houses are converted to STRs. This is a concern from a fire and life safety standpoint, as well as for neighborhood livability, because these rentals often do not meet basic building code requirements and can create aesthetic/neighborhood compatibility concerns.

Currently, the City does not have a rental housing inspection program beyond routine inspections for fire code compliance in multifamily buildings. Where STRs are concerned, the opportunity to inspect these units may be limited depending on available staff resources and the permitting and business licensing requirements that are put in place.

### ALTERNATIVES

Staff requests Council direction on whether to initiate a public process for amending the code to allow STRs. Any amendment to the development code would go to the Planning Commission for a recommendation to Council. Alternatives include:

1. Do nothing/continue proactive enforcement of STRs. This requires continued investment of staff time, and resources for technical (software) support to review and verify online listings, and enforce the code<sup>6</sup>; **OR**
2. Amend the code to allow STRs:
  - a. Allow partial house rentals where a primary resident is onsite during the rental (“home sharing”). Home sharing could be permitted by right where it is not more impactful than a Home Occupation<sup>7</sup>. Alternatively, development review (Minor

<sup>5</sup> The Community Development Code defines “family” as “An individual or two or more persons related by blood, marriage, legal adoption, or associated by guardianship, conservatorship or a foster care relationship, or a group of not more than five persons not so related or associated living together in a dwelling unit as a single housekeeping unit.”

<sup>6</sup> The Planning Department proposed budget for 2018-19 makes the temporary code enforcement assistant permanent, increasing capacity for planning inspections and enforcement of various codes, including STRs.

<sup>7</sup> “A **home occupation** may be conducted where allowed by other provisions of this Code if the following conditions are continuously complied with: (1) The use does not alter the residential character of the neighborhood nor infringe upon the right of residents in the vicinity to the peaceful enjoyment of the neighborhood. (2) A current and valid business license is maintained. (3) No employees other than family members who reside at the dwelling. (4) No outside storage of goods or materials other than vegetation. (5) **No more than 25% of the aggregate floor area** on the lot is devoted to nonresidential use; an accessory structure may be used provided the provisions of this subsection are met. (6) Marijuana facilities are prohibited.” [LOC 50.03.004.b.ii]

Development) approval could be required prior to issuance of a business license. This would allow the City to impose conditions of approval to alleviate neighborhood impacts not otherwise addressed by use-specific standards.

**OR**

- b. Allow home-sharing and STRs without an owner/host on-site. STRs would be subject to use-specific standards, with the same permitting options as in 'a'.

Under either scenario, 2.a or 2.b, the scope may include but would not be limited to addressing parking, security and safety, property maintenance, communication with neighbors, and other land use concerns identified previously by the Planning Commission and Council.<sup>8</sup> Staff would work with the Planning Commission to draft code and solicit public input. The City Council would directly address any requirements that fall outside the Commission's purview, such as licensing, fees, and budgetary requirements. If the Council chooses scenario 2.a or 2.b, it should also provide direction on the type of inspections, if any, that it desires.

Options include requiring inspections:

- Only for remodels and other construction where a building permit is required (current code), with no other certification or inspections required.
- Once prior to receiving business license; and, at the time of annual business license renewal, owner certifies that fire code requirements continue to be met.
- Ongoing, when business license is issued and annually at the time of renewal.

**FISCAL IMPACT**

Any of the above options would have an impact on staff workload and budget. Currently, staff time devoted to STR enforcement is approximately 0.25 FTE, or roughly \$25,000 in labor (includes benefits). The City is also spending approximately \$5,000 per year for software and outside technical assistance.

The current policy (proactive enforcement) can be maintained with existing resources. Under option 2.a or 2.b, the Finance Department would need to be involved in processing business licenses and collecting hotel taxes. Based on the above estimate of tax revenue foregone (for the current number of STRs operating illegally), it would be necessary to charge more than the standard business license fee of \$80 per business to achieve cost recovery. However, if STRs were legalized there could be growth in the number of rentals/tax revenue.

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<sup>8</sup> In addition to parking, security and safety, communication with neighbors, and other land use concerns identified by the Planning Commission, Council should consider whether to prohibit short-term rental of secondary dwelling units (SDUs), as SDUs are a key component of the Council's goal for economical workforce housing.

**RECOMMENDATION**

Council is not expected to take action at this time but may provide direction to staff to come back with more analysis or options if there is enough support for legalizing STRs.

**ATTACHMENTS**

1. Map of Short-Term Rentals
2. Short-Term Rentals Data Summary Table
3. Articles on Short-Term Rentals

## Draft Process and Timeline

### Short-Term Rental (STR) Regulations

