

Rec. 6/8/23
#23-32A

Exhibit #18

Shortcomings in the Proposed STR Regulations

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1. The proposed STR regulations conflict with the POCD because non-resident hosted STRs allowed by §8.31.B.14 will reduce the number of homes available for permanent residency.
2. The purpose, as defined in §8.31.A of the proposed STR regulations, is not useful.
3. The proposed regulations are unfair because §8.31.B.2 prohibits STRs in the Highlands, but allows them in other residential developments.
4. The proposed regulations are excessive because they require a copy of the property card (§8.31.C); proof that the owner's property taxes are current (§8.31.B.4); a copy of the STR's host's photo ID or Driver's license (§8.31.C.2); a requirement that the dwelling complies with zoning, building, fire, health, and blight ordinances and regulations (§8.31.B.5) – which are unrelated to the purposes of zoning and are not required in the zoning regulations for other land uses.
5. The proposed regulations (§8.31.B.9) do not place a limit on the number of underage guests, which can cause unsafe overcrowding conditions.
6. The proposed regulations (§8.31.B.14) fail to require prospective guests, before they reserve an STR, to be notified that their conduct will be recorded.
7. The regulations (§8.31.C.7) fail to list the minimum performance requirements for the video and sound recording system (optional in lieu of a resident host), fail to specify who is responsible for operating, storing and protecting its data, fail to specify how long the video data must be saved, and fail to require that the zoning official will have access to the recordings upon request.
8. The proposed regulations do not impose a vetting requirement for STR guests.
9. The proposed regulations will be too difficult to enforce in a fair and uniform manner.
10. The proposed regulations create an unfair and unreasonable risk of nuisance to residential neighborhoods.
11. The proposed regulations impose an excessive enforcement burden on the neighbors of an STR.