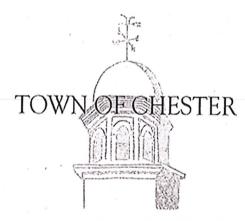


# CHESTER PLANNING COMMISSION AGENDA August 1, 2022, 6:30 PM

The Town Hall is now able to have a combination in-person and Zoom meeting. The link for this Zoom meeting is on the home page of Chester's website, chestervt.gov as the Planning Commission meeting.

- 1. Changes to the Agenda.
- 2. Review & Approve minutes from July 18, 2022 meeting.
- 3. Citizen Comments.
- 4. Bylaw amendment hearing for Legacy Uses and Adaptive Re-use.
- 5. Review the updated draft Short Term Rental ordinance.
- 6. Review the updated draft community survey.



## **PLANNING COMMISSION**

### **PUBLIC HEARING NOTICE**

## PROPOSED AMENDMENT TO UNIFIED DEVELOPMENT BYLAWS

The Chester Planning Commission will hold a public hearing on a proposed amendment to the Town of Chester Unified Development Bylaws on <u>Monday</u>, <u>August 1</u>, <u>2022 at 6:30 p.m.</u> at the Chester Town Hall at 556 Elm Street in Chester, Vermont. This public notice is given pursuant to 24 V.S.A. Section 4444.

The principal purpose of the proposed development bylaws amendment is to add two features to section 3.19 Non-Conformities. Legacy Uses will allow a parcel's former use to be re-instated after more than a 2-year discontinuance if the use is shown to have had a benign history and to be part of the town's cultural heritage. Adaptive Re-use will allow a specialized structure that has outlived its original function to be given a new use that is not currently allowed in the zoning district. The changes will affect every geographical area of Chester.

The full text of the proposed amendment to the Town of Chester Unified Development Bylaws may be viewed at the Town Clerk's office and on the home page of the Town's website at <a href="https://www.chestervt.gov">www.chestervt.gov</a>.

Dated at Chester, Vermont this 13th day of July 2022. Hugh Quinn, Planning Commission Chair

## Chester Planning Commission Reporting Form for Municipal Bylaw Amendment Legacy Uses and Adaptive Re-use

This report is in accordance with 24 V.S.A. §4441(c) which states:

"When considering an amendment to a bylaw, the planning commission shall prepare and approve a written report on the proposal. A single report may be prepared so as to satisfy the requirements of this subsection concerning bylaw amendments and subsection 4384(c) of this title concerning plan amendments... The report shall provide (:)

(A) brief explanation of the proposed bylaw, amendment, or repeal and ... include a statement of purpose as required for notice under §4444 of this title,

The purpose of this amendment is to address two situations which involve non-conforming uses. In the case of a Legacy use, a parcel has had a use with a benign history that had become part of the town's cultural heritage. If business was discontinued for more than 2 years and the use is no longer allowed in the zoning district, it cannot be restarted. The legacy use provision would allow the original use to be restarted on the parcel in question after the applicant shows the use had a benign history, is a part of the town's heritage and a conditional use hearing is held. The purpose of adaptive re-use it to take advantage of the life left in a specialized building which has outlived its original purpose. The purpose may no longer be necessary or profitable. The amendment would allow a such a building to be put to a use it is suited for but is not currently allowed in the zoning district. Again, a conditional use hearing before the Development Review Board would be required before the permit could be issued.

- 1. The proposal conforms with or furthers the goals and policies contained in the municipal plan, including the effect of the proposal on the availability of safe and affordable housing This strategy will support Goal 1 of the Town Plan: "To encourage development so as to maintain the existing settlement pattern of compact village centers separated by rural countryside" and Goal 2, "to encourage a strong and diverse economy that provides satisfying and rewarding job opportunities". The proposed amendments allow existing buildings to be put to new uses instead of sitting vacant and restore uses in the same place they have proven successful in the past.
- 2. Is compatible with the proposed future land uses and densities of the municipal plan The amendments will encourage the re-use of existing buildings and the re-establishment of businesses in their traditional locations. They do not encourage development in areas currently not developed.
- 3. Carries out, as applicable, any specific proposals for any planned community facilities. These changes foster in-fill development, not expansion of development into undeveloped areas. This will minimize any impact to planned community facilities. Adaptive re-use could provide space to house community facilities.

The two amendments will be added to Section 3.19 Non-Conformities.

# Transmission Copy CHESTER UNIFIED DEVELOPMENT BYLAWS

06/20/22

Changes are in red type

## 3.19 NON-CONFORMITIES, LEGACY USES AND ADAPTIVE RE-USE

**A.** Existing Nonconformities. Nothing in this section shall be construed to restrict the authority of the Town of Chester to abate public nuisances or to abate or remove public health risks or hazards. Any lawful lot, building or use in existence at the time of adoption or amendment of these Bylaws may be continued. Such lot, building or use shall meet all other requirements of these Bylaws, and is subject to the following provisions.

## B. Nonconforming Lots.

- 1. Any existing lawful lot that does not meet the specified dimensional requirements in these Bylaws, may be maintained and developed for the purposes permitted in that district as long as all other requirements for that district are met.
- 2. Existing Small Lots. In accordance with the Act [§ 4412], any lot that is legally subdivided, is in individual and separate and nonaffiliated ownership from surrounding properties, and is in existence on the date of enactment of this bylaw, may be developed for the purposes permitted in the district in which it is located, even though the lot does not conform to minimum lot size requirements of the district in which the lot is located, provided such lot is not less than one eighth acre or has a minimum width or depth dimension of at least 40 feet.
  - a. If an existing small lot subsequently comes under common ownership with one or more contiguous lots, the nonconforming lot may be separately conveyed if the lots are conveyed in their preexisting, nonconforming configuration, provided such lot is not less than one eighth acre or has a minimum width or depth dimension of at least 40 feet.

### **C.** Nonconforming Structures

- 1. Any legal structure or part thereof, which is not in conformance with the provisions of these bylaws concerning setback, height, size, or other structural requirements (including such things as parking, lighting, buffers, and lowest floor elevation in floodplain zoning) shall be deemed a nonconforming structure. Legal nonconforming structures exist as a result of construction prior to adoption of bylaws, or construction under an earlier set of less restrictive bylaws. Any nonconforming structure may be allowed to exist indefinitely, but shall be subject to the following provisions:
- 2. Subject to conditional use approval by the DRB, a nonconforming structure may be restored or reconstructed after unintentional loss provided the reconstruction is commenced within two years and does not increase the degree of non-conformance that existed prior to the damage.
- 3. A nonconforming structure which has been demolished shall not be reconstructed except in conformance with these bylaws. The DRB may grant a waiver from this provision if a

hardship would be created by rebuilding in strict conformance with the requirements of these bylaws. In considering a waiver from these provisions, the DRB shall take into consideration the ability of the applicant to use remaining features of the property such as foundation, water supply, sewage disposal system, underground utilities, etc.

- **4.** A nonconforming structure shall not be moved, altered, extended, or enlarged in a manner which will increase the existing degree of non-conformance.
- 5. The phrase 'shall not increase the degree of non-conformance' shall be interpreted to mean that the portion of the structure which is nonconforming shall not increase in size (or decrease in the event of failing to meet minimum standards such as parking and lighting). Therefore, portions of a structure within a setback area cannot be enlarged, portions above the maximum height cannot be expanded where parking is deficient the number or size of spaces cannot be reduced, etc. This phrase is not intended to prevent existing unfinished space from being finished or other similar scenarios provided there is no increase in size.
- **6.** Nothing in this section shall be deemed to prevent normal maintenance and repair of a nonconforming structure provided that such action does not increase the degree of nonconformance.
- 7. The DRB shall permit the alteration or expansion of a nonconforming structure for the sole purpose of conformance with mandated environmental, safety, health, or energy codes.

## D. Nonconforming Uses, Legacy Uses and Adaptive Re-use

- 1. Nonconforming Uses. Any use, which does not conform to uses allowed in the district in which it is located or is otherwise not in conformance with the provisions of these bylaws, shall be deemed a nonconforming use. Nonconforming uses are those that exist legally as a result of existing prior to adoption of bylaws, or permitted under an earlier set of less restrictive bylaws. Any nonconforming use may be continued indefinitely, but shall be subject to the following provisions:
  - a. The nonconforming use shall not be changed to another nonconforming use without approval by the DRB, and then only to a use that, in the opinion of the DRB, is of the same or of a more conforming nature.
  - b. The nonconforming use shall not be re-established if such use has been discontinued for a period of two-years or has been changed to, or replaced by, a conforming use. Intent to resume a nonconforming use shall not confer the right to do so. See also 2. Legacy Uses.
  - c. The nonconforming use shall not be expanded, extended, moved or enlarged unless the DRB finds that such expansion, extension, movement, or enlargement does not increase the degree of non-conformance. Examples of enlarged or expanded uses can include increased hours of operation, increased numbers of tables, number of employees or an increase in the size of the operation through the expansion of a conforming structure.
  - d. The DRB shall permit the alteration or expansion of a nonconforming use for the sole purpose of conformance with mandated environmental, safety, health, or energy codes.

2. Legacy Uses. The DRB may determine that a past or present nonconforming use, by virtue of its benign history and cultural heritage in Chester, is a Legacy Use and is therefore deemed an allowed and conforming conditional use in the district in which it is located. The applicant shall demonstrate that a past or present nonconforming use has sufficient benign history and cultural heritage in Chester to be determined a Legacy Use. Determination as a Legacy Use is indefinite in duration, but a Legacy Use may be re-established, expanded, extended or enlarged only following conditional use review and approval by the DRB and a zoning permit issued by the Zoning Administrator.

#### 3. Adaptive Re-use.

- a. **Purpose.** To encourage the continued viability of older, special-use buildings that have outlived their original function by allowing for a variety of possible new uses to be established within the existing building in a manner that is compatible with the character of the area for the district in which it is located.
- b. **Applicability**. The adaptive reuse of special-use buildings within all zoning districts is subject to review by the Development Review Board and must meet the conditional use requirements specified in Section 4.8 and the adaptive re-use provisions in Section 3.19.D.
- c. **Eligible Building Criteria.** The Development Review Board will determine whether the adaptive reuse provision shall apply to any proposed building based upon either or both of the following criteria:
  - i. The building was originally built for purposes that are not currently allowed in the zoning district in which it is located.
  - ii. The building, by the nature of its size, type, construction method or location on the parcel, does not meet the regulations including dimensional standards for the zoning district in which it is located.
- d. **Review Process and Standards.** Conditional Use Approval by the Development Review Board is required for all adaptive re-use proposals, subject to the following additional standards:
  - An applicant may propose one or more uses to be established within an eligible building;
  - ii. Any rehabilitation or restoration associated with an adaptive re-use shall not significantly alter the façade or historic character of the structure. Any proposed exterior renovations shall conform to the guidelines set forth in the most recent edition of the U.S. Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, whether or not the building qualifies or is designated as an Historic Building;

iii. The Development Review Board may waive the zoning district dimensional standards or surface water protection setbacks if needed to support the proposed use.

#### Illustrations of the Proposed Legacy Use and Adaptive Re-use Bylaw Amendments

#### Legacy Use

A recent example of a legacy use in Chester is Baba a Louis, the restaurant and bakery on Route 11 west of the center of town. The business received a permit for a restaurant/retail store at that location in 1995. It was a gathering place for many Chester residents and the source of delicious baked goods until 2018, when the business closed.

When the permit was issued in 1995, the parcel was in the R-20 district and restaurant and retail store were conditional uses in the district. Changes to the bylaws and zoning map were enacted in 2014. The parcel ended up in the R120 district, where restaurant and retail store were not allowed. The existing business was allowed to continue as a non-conforming use. When the business closed in 2018, the building was left vacant. No other business took its place. Three years later, interest in starting some type of food preparation business on the parcel emerged. The permit for the non-conforming restaurant/retail store had lapsed. Section 3.19 of the adopted bylaws states "The nonconforming use shall not be re-established if such use has been discontinued for a period of two years". No new permit could be issued since no type of food preparation was allowed in the R-120 district.

The Legacy Use amendment would allow an applicant to show that the former restaurant/retail store had not caused any difficulties in the past and had been part of Chester's culture. When those criteria are met, an applicant could apply for a restaurant/retail permit via a conditional use hearing. The hearing would give the neighbors to the proposed business a chance to hear the proposal and make any objections they might have.

This amendment acknowledges that commercial activity in Chester can move slowly and facilitates reestablishment of businesses that were successful in the past.

#### Adaptive Re-use

Many buildings are built for a specific purpose and have architectural features to support the purpose. The building could be unusually large, such as a barn, or it could have specialized doors such as a warehouse. At times, a building outlives its purpose, as when a farm is broken into smaller tracts of land for housing, but the barn remains. The building is still useable, but none of its potential uses is allowed in the zoning district where the building is located. Adaptive re-use would allow the building to have a new use not currently allowed in the district after a conditional use hearing. The barn might be converted into a brewery and restaurant even though it is in a residential district where these uses are not allowed. The conditional use hearing would document the impact the business could have on the neighborhood. The business hours, traffic patterns, light, noise, hazardous chemicals, etc. would be discussed and the neighboring property owners could voice their objections or support. The armory on Route 11 West is an example of a specialized building which is vacant and is having difficulty finding a new purpose. This amendment would remove some barriers to putting it back in service.

Re-using the building can reduce the waste stream associated with tearing down the building and constructing another, can encourage denser land use and can conserve the historic appearance of a town. If the original building does not conform with the current zoning district setbacks, adaptive re-use will allow the project to go forward without meeting those standards. The assumption is the placement of the building has been tolerated by the town since it was built and there is no need to force a change.

# Chester Planning Commission Reporting Form for Municipal Bylaw Amendment Legacy Uses and Adaptive Re-use

This report is in accordance with 24 V.S.A. §4441(c) which states:

"When considering an amendment to a bylaw, the planning commission shall prepare and approve a written report on the proposal. A single report may be prepared so as to satisfy the requirements of this subsection concerning bylaw amendments and subsection 4384(c) of this title concerning plan amendments... The report shall provide (:)

(A) brief explanation of the proposed bylaw, amendment, or repeal and ... include a statement of purpose as required for notice under §4444 of this title,

The purpose of this amendment is to address two situations which involve non-conforming uses. In the case of a Legacy use, a parcel has had a use with a benign history that had become part of the town's cultural heritage. If business was discontinued for more than 2 years and the use is no longer allowed in the zoning district, it cannot be restarted. The legacy use provision would allow the original use to be restarted on the parcel in question after the applicant shows the use had a benign history, is a part of the town's heritage and a conditional use hearing is held.

The purpose of adaptive re-use it to take advantage of the life left in a specialized building which has outlived its original purpose. The purpose may no longer be necessary or profitable. The amendment would allow a such a building to be put to a use it is suited for but is not currently allowed in the zoning district. Again, a conditional use hearing before the Development Review Board would be required before the permit could be issued.

1. The proposal conforms with or furthers the goals and policies contained in the municipal plan, including the effect of the proposal on the availability of safe and affordable housing

This strategy will support Goal 1 of the Town Plan: "To encourage development so as to maintain the existing settlement pattern of compact village centers separated by rural countryside" and Goal 2, "to encourage a strong and diverse economy that provides satisfying and rewarding job opportunities". The proposed amendments allow existing buildings to be put to new uses instead of sitting vacant and restore uses in the same place they have proven successful in the past.

2. Is compatible with the proposed future land uses and densities of the municipal plan

The amendments will encourage the re-use of existing buildings and the re-establishment of businesses in their traditional locations. They do not encourage development in areas currently not developed.

3. Carries out, as applicable, any specific proposals for any planned community facilities.

These changes foster in-fill development, not expansion of development into undeveloped areas. This will minimize any impact to planned community facilities. Adaptive re-use could provide space to house community facilities.

The two amendments will be added to Section 3.19 Non-Conformities.

## 8/1/22 DRAFT

## TOWN OF CHESTER, VERMONT

## ORDINANCE TO REGULATE THE OPERATION OF SHORT-TERM RENTALS (STRs)

**SECTION 1. AUTHORITY.** Under authority granted in 24 V.S.A § 2291(29), the Selectboard of the Town of Chester hereby adopts the following civil ordinance requiring annual registration for the operation of short-term rentals within the town.

**SECTION 2. PURPOSE.** The purpose of this Ordinance is to promote and protect the public health, safety, welfare, and convenience of the town, to preserve residents' rights to quiet enjoyment of homes and properties, and to ensure the safety of occupants of short-term rentals.

#### **SECTION 3. DEFINITIONS.**

- A. <u>"Host" means a person who operates a short-term rental (whole or partial unit). The host is the primary contact for guests to make reservations and to contact during their stay. The host oversees compliance of the short-term rental with all applicable rules and regulations. The host may be the property owner, a tenant, or a manager.</u>
- B. "Short-term rental" or "STR" means a dwelling unit rented to the transient, traveling, or vacationing public for a period of fewer than 30 consecutive days and for more than 14 days per calendar year, <u>and is either a:</u>
  - 1. <u>"Partial Unit" meaning a room or group of rooms located within a Host's primary residence; or</u>
  - 2. "Whole Unit" meaning an entire dwelling unit.

<u>"Tourist Lodging"</u> as defined and permitted under the Chester Unified Development Bylaws is not a short-term rental and is not regulated under this Ordinance.

- C. "Dwelling unit" means a furnished house, condominium, apartment, or room or group of rooms used as living quarters.
- D. "STR Administrator" means a person or persons designated by the Selectboard of the Town of Chester to administer and enforce this Ordinance.

#### SECTION 4. SHORT TERM RENTAL REGISTRATION.

- A. The short-term rental of a dwelling unit requires an annual Short-Term Rental Registration from the STR Administrator. A person shall not commence the use of a dwelling unit as a short-term rental unless and until the STR Administrator issues the requite Short-Term Rental Registration.
- B. The dwelling unit capacity when registered as a short-term rental shall be two occupants for every bedroom plus an additional two occupants. For example, a three-bedroom dwelling unit shall have a dwelling unit capacity of eight persons ((3 bedrooms X 2) + 2) when used as a short-term rental.
- C. An application for Short-Term Rental Registration, for dwelling units with an occupancy of 8 or less, shall require the following:

- 1. The number of bedrooms to be rented and the requested dwelling unit capacity to be approved in the Short-Term Rental Registration.
- 2. The host's name, address, email, and a cell phone number or other number that will be answered during the time that the short-term rental unit is being rented.
- 3. The property owner's name, address, phone number, email, date of birth, driver's license and license state, and military status (active or not), and if the owner is a corporation, the registered corporate agent and president of the corporation and their name and address, and if the owner is a partnership, the registered partnership agent and the names and addresses of the general partners (for enforcement purposes).
- 4. <u>For property owners who do not live within Windsor County, a designated agent</u> located in Windsor County for service of process.
- 5. The Posting of Contact Information required by 18 V.S.A. § 4467.
- 6. The education materials required by 18 V.S.A. § 4468(a), including without limitation the self-certification form pertaining to health and safety precautions that Hosts must take into consideration prior to renting a dwelling unit required by 18 V.S.A. § 4468(b).
- 7. Proof that the liability insurance policy that covers the dwelling unit extends bodily injury and property damage insurance coverage that occurs during or as result of the use of the dwelling unit as a short-term rental.
- D. An application for Short-Term Rental Registration, for dwelling units with a capacity of greater than 8 occupants, shall require compliance with subsection C above, plus the following:
  - 1. Proof that the sewer or septic capacity is at least equal to the requested short-term rental dwelling unit capacity as approved on a Town of Chester Sewer Connection Permit, OR, a State of Vermont Wastewater and Water Supply Permit for the property for dwelling units constructed or occupied after June 30, 2007, OR, the local zoning or septic permit for dwelling units constructed before July 1, 2007, OR, by the number of bedrooms indicated in the listers property database if a local zoning or septic permit does not exist for dwelling units constructed before July 1, 2007.
  - 2. An inspection report with occupancy approved from the State of Vermont Division of Fire Safety for the requested short-term rental dwelling unit capacity.
- E. No registration for the short-term rental of a dwelling unit shall be issued unless the applicant has complied with subsection C above (for dwelling units with an occupancy of 8 or less) or has complied with subsection D above (for dwelling units with a capacity of greater than 8 occupants).

- F. Short-Term Rental Registrations shall expire on April 30 of each year and require renewal to continue use of a dwelling unit as a short-term rental.
- G. The number of lessees, guests, or other persons using a dwelling unit pursuant to the short-term rental lease or other agreement with the Host shall not exceed the approved dwelling unit capacity on the Short-Term Rental Registration.
- H. The use of a dwelling unit by a number of lessees, guests, or other persons in excess of the approved dwelling unit capacity on the Short-Term Rental Registration shall constitute a violation of this Ordinance.

**SECTION 5. FEES.** A fee shall be paid to the Town of Chester with the submission of any Short-Term Rental Registration application or annual renewal. The fee shall be in the amount of \$150 per year for partial unit short-term rentals and \$300 per year for whole unit short-term rentals. The Selectboard may, from time to time, modify this fee and may establish and adopt other fees related to the administration and enforcement of this Ordinance, and may incorporate all such fees into a duly adopted fee schedule.

**SECTION 6. ENFORCEMENT.** Any person who violates a provision of this Ordinance shall be subject to the civil penalty of up to \$800 per day for each day that a violation continues. Each day the violation continues shall constitute a separate offense. The STR Administrator, Chester Police Officers, the Chester Zoning Administrator, and the Chester Town Manager shall all be designated and authorized to act as Issuing Municipal Officials to issue and pursue before the Judicial Bureau, or other court having jurisdiction, a municipal complaint.

**SECTION 7. WAIVER FEES.** An Issuing Municipal Official is authorized to recover waiver fees, in lieu of a civil penalty, in the following amount, for any person who declines to contest a municipal complaint and pays the waiver fee:

a) Operating an STR without a Registration - \$500

b) All other violations:

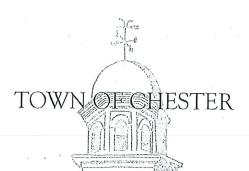
First Offense - \$100
Second Offense - \$250
Third Offense - \$500
Fourth and Subsequent Offenses - \$700

Offenses shall be counted on a twelve-month basis, beginning on May 1 and ending on April 30 of each year. An Issuing Municipal Official shall have authority to issue a written warning, without recovering a waiver fee, for any First Offense violation other than Operating an STR without a Registration. In such instance, the written warning shall be counted as a First Offense for calculating annual offenses.

**SECTION 8. PENALTIES.** An Issuing Municipal Official is authorized to recover civil penalties in the following amounts for each violation:

d)	All other violations:	
	First Offense -	\$400
	Second Offense -	\$600
	Third Offense -	\$800
	Fourth and Subsequent Offenses - before a new Short-Term Rental Reg	\$800, plus automatic revocation for twelve months gistration application may be submitted.
each y recove Regist	ear. An Issuing Municipal Official sha ering a civil penalty, for any First Offer	th basis, beginning on May 1 and ending on April 30 of Ill have authority to issue a written warning, without hise violation other than Operating an STR without a varning shall be counted as a First Offense for
of Title the Ve or sus	e 24, the Chester Town Manager is au ermont Superior Court to obtain injun	e enforcement procedures available under Chapter 59 othorized to commence civil action in the Civil Division of ctive and other appropriate relief, to request revocation gistration on behalf of the Chester Selectboard, or to v.
	-	of this Ordinance is held by a court of competent not invalidate any other part of this Ordinance.
the Se		ice shall become effective 60 days after its adoption by 24 V.S.A. § 1973, that statute shall govern the taking
Date o	of adoption by the Selectboard:	
Signat	ures of Selectboard members:	

c) Operating an STR without a Registration - \$800



PLANNING COMMISSION 556 Elm Street P.O. Box 370 Chester, VT 05143

(802) 875-2173 office (802) 875-2237 fax pcchair@chestervt.gov www.chestervt.gov

August 1, 2022

Dear Chester Selectboard:

The Planning Commission is focusing on the topic of Short-Term Rentals (STRs). STRs have become a highly visible and debated topic across many towns in Vermont as well as across the country.

Strategies for STR regulation vary widely from simple registration programs to very strict and limiting policies regulating how and where STRs are allowed. Some of the most common concerns about STRs are related to health and safety, diminished neighborhood character, and impact on housing affordability, yet at the same time STRs can provide an important source of revenue helping people afford their properties and increasing tourism.

Chester currently does not regulate STRs. Chester has approximately 80 STR listings which represents about 8% of the housing stock. The majority are single family homes where the entire house is rented. In the past two years STR growth has increased by 58%.

Given the increasing popularity of the STR business model combined with the trends in Chester, the Planning Commission feels a "do nothing" approach is no longer in the Town's best interests, nor is an approach that would create a high degree of regulation. The Planning Commission recommends a crawl, walk, run approach where the first step is to create an annual STR registration process to better understand how STRs are operating within the community and to promote and protect the public health, safety, and welfare.

Attached please find a draft Short-Term Rental Ordinance that embodies the Planning Commission's recommendations for your consideration. Administration of the ordinance could be budget neutral through the charging of annual fees and contracting with an STR compliance monitoring provider.

Sincerely,

Hugh Quinn

Planning Commission Chair