

Public Comments on RSTRs Received Via Email – March 13, 2025

From: Anson Fogel <anson.fogel@gmail.com>

Subject: PUBLIC COMMENT ON RSTR ORDINANCE CHANGES

Date: March 5, 2025 at 8:19:40 PM MST

1. Do you want the economic opportunity to have an RSTR? Yes, unequivocally.

What benefits would operating an RSTR allow you? If we could not RSTR our home, we would have to sell it. We will be back in Boulder full-time after our daughter graduates high school in salt lake, not an uncommon situation.

How long do you imagine you would want to run an RSTR for additional income? While our daughter is in school, so 2.5 more years. After that, we would still like the right to rent it short term on a reduced basis when we are out of town.

2. Are the areas appropriately defined? (Here is a possible change: Upper Boulder stays the same. Middle Boulder includes all property that accesses HWY 12 and Burr Trail. Lower Boulder will be all property that is accessed off Lower Boulder Road. As Lower Boulder is a one way street that needs some access improvements. And there are already two other lodging options accessed by lower boulder road. Including a B&B and a guest ranch)

The creation of "areas" and related limits in the RSTR code seems excessively complex, hard to track and confusing to the public, without upsides that would make it worth the downsides. I believe history shows that this approach has not materially resulted in spreading out the location of RSTR's as it was intended.

3. Is the current limitation of RSTR at 15 % of the permanent residence dwellings appropriate? (The reasoning for restrictions on RSTR was that they would take away from opportunities for much needed long term rentals and they had an impact on the safety and wellbeing of neighborhoods.)

First, I believe simplicity of processing and enforcement, and clarity for the public, should be a priority for all Boulder Ordinances, including any changes to the RSTR ordinance. As such, using 15% of dwellings as the metric to determine when the RSTR pool is full, so to speak, is bad policy. Who will calculate that 15%, how often, and how - what constitutes a dwelling? This metric is hard to define, hard to observe and burdens an understaffed town government. While I personally see no reason to limit it, period, if the town feels that 15% is a healthy target, that should be treated as a single number, say, 25, or 30 - and revisited only when town government feels it necessary. I would add in closing that the tax records used in 2019 to determine the original # are now woefully outdated, and the tax records are not a particularly reliable way to count livable dwellings.

I would submit that limiting the # of RSTR's is a regulatory effort to make us all feel better, but has no practical effect. If removing limits to regulation were going to result in an explosion of RSTR's, we would be seeing that now during the current amnesty, and would expect to have seen many non-compliant RSTR's in the past, given the lack of enforcement. Neither occurred. The Owen's guest ranch RSTRS pool is large enough that they can saturate the (limited) market. Regulations should be made when they clearly address problems. There is not currently a problem. If such a problem begins to actually exist, the town can of course put a limitation in place at any time.

As for the safety and well being of neighbors, this too seems irrational to me: The central premise of limiting RSTR's, as you note, is to assure that long term rentals do not get replaced by short term. So, any given dwelling would have either a) A long term tenant or group of tenants (family, roommates) OR visiting short term tenants. Whether the tenants are short term or long term, they are no less likely to make noise, start fires or otherwise disrupt the "safety and wellbeing" of neighbors. The assumption seems to be that long term tenants are angels, and short term tenants devils. I dont think this assumption is correct. Long term renters have more impact, typically. In either case, landlords are responsible for managing their tenants, and making corrections when their behavior is disruptive, whether that tenant is long or short term. As such, I question the fundamental motive for restricting RSTR's given the financial hardship experienced by locals as a result.

4.Should we change from a percentage to a number based limitation? (The RSTR committee is concerned about subjective and objective issues in setting a number versus percentage of permanent residents. Changes determined via percentage seem to be a more objective choice.

5.Should our town adopt the Garfield County Short Term Rental Standards in the application process? <https://www.garfield.utah.gov/home/showpublisheddocument/2936/638682174258070000>

Yes! Simpler to follow for citizens, less work for the town.

6.Or use the County ordinance that follows the inspection process by the County building department? (a requirement for the county to accept doing inspections)

No. The Garco building dept is very busy and not well staffed. Jerrod is not going to want to add to his schedule to inspect existing dwellings. What is the motive for inspections, fundamentally? Does the town require inspections for long term rentals? No. So why require inspections for short term rentals? They are not fundamentally different, just length of use. Again, inspections add cost, and complexity and effort for the town, the county AND the owner. The town should not enact legislation that adds to its workload until it can afford to do so, and do so well.

I also question again the efficacy of inspections. The market itself does a good job here - to be blunt, if the AirBNB sucks, it gets bad reviews, and people dont rent it. If its unsafe, and a renter gets harmed, the renter sues the owner , the owner loses \$\$, and the owners insurance company drops them, airBNB drops them, etc

7.Including the enforcement provisions in the county STR ordinance.? (Garfield County #4 enforcement language. Plus include 182 days per year to rent?) **Yes, this is sensible.**

Committee thoughts are that the documentation that would be required for submitting yearly tax documentation would enforce the 182 day limitation.

Again, does the town have the resources to efficiently and quickly review all of these annual tax document submissions? And why? Any owner that is sufficiently motivated and ethically empty can submit tax documents that prove, well, whatever they want them to prove. I do appreciate that enforcement is desirable, however, the IDEA of this enforcement approach should be considered against

the reality of it. I would keep the limitations at 182 days, and leave it at that. If it becomes a problem for some or all RSTR'S, the town can react with enforcement actions as needed.

8. Are there any other regulations that should be considered?

(Other than: The requirements that are in the Boulder RSTR Ordinance such as the night sky protection. Noise restrictions, Animal control, Rules for the guests requiring clear indications of private property lines, access limitations and dog control, plus Fire inspection by the Boulder Fire Authority for required fire access approval and outdoor fire pits. All will be considered as part of the revised ordinance. Plus possibly sharing the phone number of the owner/manager of the RSTR with the neighboring residents.)

This is all generally sensible, with the exception of "Fire inspection by the Boulder Fire Authority for required fire access approval and outdoor fire pits" - are we saying that volunteer/unpaid Pete or Pete's future replacement must now inspect every RSTR? That seems unreasonable.

With respect to all of the issues of inspections and safety and condition of the rental unit, consider the following:

Are long term rentals inspected? Do long term rentals require the same detailed applications, checklists and regulations? They do not. Then why are we burdening the town, volunteer staff, owners and the clerk with this extensive effort and process? Is there some clear difference between long and short term renters? These regulations make no sense, other than to assuage fears.

Boulder's economy is fueled by three things - cattle/ag, government (BLM, etc) and tourism. Tourism is by far the largest. RSTR's are the single most effective way for citizens to participate in the tourism economy beyond seasonal jobs. The restrictions on RSTR's negatively and demonstrably impacts locals (Brynn Brodie, anyone?) without sufficiently positive differences in the growth rate or character of the community to offset the hardship. This is not Moab - outside investors are not building houses to rent as AirBNB's in Boulder - the market is way too small, and the town far too remote and expensive to build in. The only practical result of say, unrestricted RSTRs, would be a few more second/part time homes being built to rent as RSTRs - and these homes would not have been rented long term anyway. Those homes being built - construction and ongoing maintenance - feeds a lot of local workers.

Those are my extensive and probably unpopular thoughts, thanks! Y'all are doing a great job!

From: Britney Peterson (britneyepeterson@gmail.com)

Hello,

We are grateful for the opportunity to share our comments and experience with the residential short term rental ordinance.

We have been grateful to have the opportunity to have obtained an RSTR quite some time ago. While we rarely rent our space, as it is primarily occupied by us, we appreciate it as a way to share this wonderful community with people in what feels like a really authentic Boulder experience. We have,

however, found the renewal process confusing. When we went to renew we were told there was no such process and so have been in a bit of limbo wondering what comes next.

As we see the importance of housing availability for Boulder residents, we also provide one long term housing space for one local resident to rent at a time. This is an important priority for us.

1. Do you want the economic opportunity to have an RSTR? (What benefits would operating an RSTR allow you? How long do you imagine you would want to run an RSTR for additional income?)

We have had our RSTR available since 2022, when it was approved. It benefits us monetarily and, more importantly, allows us to share what we have created and continue to improve on our space. It also benefits our small businesses as renters are sometimes clients of our businesses. We anticipate providing this service for as long as possible and as long as it benefits both us and our community.

2. Are the areas appropriately defined? (Here is a possible change: Upper Boulder stays the same. Middle Boulder includes all property that accesses HWY 12 and Burr Trail. Lower Boulder will be all property that is accessed off Lower Boulder Road. As Lower Boulder is a one way street that needs some access improvements. And there are already two other lodging options accessed by lower boulder road. Including a B&B and a guest ranch.)

Yes, this is clear to us

3. Is the current limitation of RSTR at 15 % of the permanent residence dwellings appropriate? (The reasoning for restrictions on RSTR was that they would take away from opportunities for much needed long term rentals and they had an impact on the safety and wellbeing of neighborhoods)

This is difficult to say. First of all, our short term rental doesn't take away from long term rental opportunities as it is where we live and it is only rented when we are away or for business purposes. It also doesn't impact long term rental opportunities because we are providing both. We anticipate providing a long term rental for residents as long as we have access to an RSTR.

4. Should we change from a percentage to a number based limitation? (The RSTR committee is concerned about subjective and objective issues in setting a number versus percentage of permanent residents. Changes determined via percentage seem to be a more objective choice.)

We like percentage as it keeps any one area from becoming saturated. It also allows the number to grow as housing grows.

5. Should our town adopt the Garfield County Short Term Rental Standards in the application process? <https://www.garfield.utah.gov/home/showpublisheddocument/2936/638682174258070000>

We think Boulder should have standards that are applicable to and best for our specific community.

6.Or use the County ordinance that follows the inspection process by the County building department?
(a requirement for the county to accept doing inspections)

7.Including the enforcement provisions in the county STR ordinance.? (Garfield County #4 enforcement language. Plus include 182 days per year to rent? Committee thoughts are that the documentation that would be required for submitting yearly tax documentation would enforce the 182 day limitation.)

No opinion but we do think that there should be limitations to people building and renting spaces to visitors. We prefer that residents who live in boulder over half the year have the opportunity to benefit.

8.Are there any other regulations that should be considered? (Other than: the requirements that are in the Boulder RSTR Ordinance such as the night sky protection. Noise restrictions, Animal control, Rules for the guests requiring clear indications of private property lines, access limitations and dog control, plus Fire inspection by the Boulder Fire Authority for required fire access approval and outdoor fire pits. All will be considered as part of the revised ordinance. Plus possibly sharing the phone number of the owner/manager of the RSTR with the neighboring residents.)

That RSTR owners must be residents of Boulder to avoid saturation of non-residents benefiting financially where community members could benefit.

Thank you for the opportunity to share our experience, opinions and hopes for RSTR. We love this opportunity for ourselves and for our community members and would be sad if non-residents came in to buy up precious housing that could be utilized by community members only to rent it without community involvement. We also feel that things like cleaning, maintenance, recommending local restaurants and shopping, etc. with these RSTRs has the ability to benefit the greater community and are committed to involving community whenever possible for their benefit.

We can be reached at 435-714-0162 or 435-705-8554.

Best,
Michael Steadman and Britney Peterson

Korla Eaquina <korlajane@icloud.com>

My name is Korla Eaquina and I own the little gray house on the corner of the Burr Trail. I am emailing my comments about Residential Short-Term Rentals (RSTRs) CUPs (Conditional Use Permits) .

I live in San Diego and this STR has hit us hard, especially in the beach communities. Investors come in and take away long term housing. It is a SERIOUS problem. People who have lived in communities for decades are now evicted and priced out. Boulder has always had a rental shortage and from what I see on PegBoard, it is not better. PLEASE keep a max % as it is easier to do now than later.

The permit process needs to be reviewed on a regular basis. Bad actors can make life miserable for all. The fees should be used for compliance with all RSTR regulations. And collected at each interval. The

Boulder community is best equipped to decide this interval. However, if you limit the number of STRs then review is essential and fair. Maybe new property owners would like a chance to participate.

Another point to make is that contact info for the owner needs to be posted and available 24/7. IF things get out of hand (loud, trash or parking issues come up) the owner needs to be responsible. If neighbors are impacted then the owner should be mandated to take care of it and impacted too. Provisions for enforcement.

Quality of life issues are important and Boulder is such a special place that no one wants to see it decline.

Thank You,
Korla Equinta

From: Susan Kelly

1. Do you want the economic opportunity to have an RSTR?
 - What benefits would operating an RSTR allow you?
 - How long do you imagine you would want to run an RSTR for additional income?

I do not currently have plans to have an RSTR, but I would like the opportunity to do so, if so desired, for economic reasons.

2. Are the areas appropriately defined?

See comments below

3. Is the current limitation of RSTR at 15 % of the permanent residence dwellings appropriate?

If there are to be restrictions on the number of RSTR either by percentage or an absolute value, there needs to be a mechanism in which, when all current RSTRs are claimed, opportunities for obtaining RSTR permits can be made available to others who would like to benefit from this business opportunity.

This is especially so if the “reasoning for restrictions on RSTRs is that they would take away from opportunities for much needed long term rentals.”

It is an economic reality that RSTR owners are able to make far more money than those who are limited to renting their unit to longer term stays, and currently RSTR permits are essentially without limit, provided the owner meets all the associated obligations. In addition, there are owners of RSTR’s who only rarely rent their units, essentially taking up a permit, that might be put to better use by another.

I suggest consideration of the following:

- 1) there be a minimum number of days/year that an existing RSTR be rented to be eligible for renewal.

2). there be “term limits” on how long a single person or household can continuously hold an RSTR permit. Restricting the number of permits, without setting limits on how long a person can continuously hold the permit, indefinitely economically favors those with existing RSTR permits, and forces those not fortunate enough to secure a permit early on, to accept the lower income of a longer term rental.

If RSTR permits were limited to a specific number of consecutive years, it would create opportunities for others who are wanting or needing this business opportunity to secure a permit when the current owner’s permit expires. The individual whose permit expired could reapply for the following year, on the waitlist.

In addition, limiting the length of time someone can continuously hold an RSTR could help to more equitably distribute the responsibility of providing longer term rental opportunities, as it may encourage those with expired RSTR permits to consider longer term rental opportunities.

Having RSTRS be limited in duration would also provide the opportunity for others to benefit from RSTR and would be a fairer way of implementing the quantity restrictions on RSTR than what currently exists. In addition, It would also share and limit the burden imposed on the neighborhood which the rstr is located.

3). there should be more clarity about what differentiates an RSTR from a guest ranch and an airbnb, and whether these distinctions are necessary, in the context of determining numbers of short term rentals.

4. Should we change from a percentage to a number based limitation? (The RSTR committee is concerned about subjective and objective issues in setting a number versus percentage of permanent residents. Changes determined via percentage seem to be a more objective choice.)

5. Should our town adopt the Garfield County Short Term Rental Standards in the application process? <https://www.garfield.utah.gov/home/showpublisheddocument/2936/638682174258070000>

Would suggest liaison with garfield county about any issues they have had re their current standards.

6. Or use the County ordinance that follows the inspection process by the County building department? (a requirement for the county to accept doing inspections)

Not sure what this means.

7. Including the enforcement provisions in the county STR ordinance.? (Garfield County #4 enforcement language. Plus include 182 days per year to rent? Committee thoughts are that the documentation that would be required for submitting yearly tax documentation would enforce the 182 day limitation)

Garfield county includes any dwelling rented for less than 30 days or advertise on short term rental websites.

What is the distinction between airbnb v guest ranch?

8. Are there any other regulations that should be considered? Other than: The requirements that are in the Boulder RSTR Ordinance such as the night sky protection. Noise restrictions, Animal control, Rules for the guests requiring clear indications of private property lines, access limitations and dog control, plus Fire inspection by the Boulder Fire Authority for required fire access approval and outdoor fire pits. All will be considered as part of the revised ordinance. Plus possibly sharing the phone number of the owner/manager of the RSTR with the neighboring residents.)

This is important.

From: Lisa Varga and Keith Watts, Boulder. UT

Date: March 10, 2025

Thank you for querying the public to help form your new RSTR plans and changes to the existing ordinances. This is actually a very important issue which can seriously affect the future of our town. Please share this email with all Planning commissioners. I would like to address your questions specifically.

1. Do you want the economic opportunity to have an RSTR? (What benefits would operating an RSTR allow you? How long do you imagine you would want to run an RSTR for additional income?)

No. Although I own a perfect dwelling that could be used as an RSTR, I am committed to providing affordable, long term housing to Boulder locals.

While I do not oppose a 'manageable' number of airbnbs, the proliferation of RSTR airbnbs damages the fabric of our community and creates double whammy of problems for renters, fewer long-term rentals at ridiculously higher prices.

2. Are the areas appropriately defined? (Here is a possible change: Upper Boulder stays the same, Middle Boulder includes all property that accesses HWY 12 and Burr Trail. Lower Boulder will be all property that is accessed off Lower Boulder Road. As Lower Boulder is a one way street that needs some access improvements. And there are already two other lodging options accessed by lower boulder road. Including a B&B and a guest ranch)

No. I support this proposed change. It better defines the neighborhoods.

3. Is the current limitation of RSTR at 15 % of the permanent residence dwellings appropriate? (The reasoning for restrictions on RSTR was that they would take away from opportunities for much needed long term rentals and they had an impact on the safety and wellbeing of neighborhoods.)

YES. Increasing the number of RSTR will dramatically impact the future of our town. This is especially true because we are a 'gateway community' to Public Lands, National Parks and Monuments. Tourism supports our town, but we must be mindful and cultivate the type and amount of tourism that we want to invite and support. Remember the dismay of Moab residents who said, "We went fishing for a little tourism, and pulled in a great white shark".

4. Should we change from a percentage to a number based limitation? (The RSTR committee is concerned about subjective and objective issues in setting a number versus percentage of permanent residents. Changes determined via percentage seem to be a more objective choice.)

Keep percentage.

5. Should our town adopt the Garfield County Short Term Rental Standards in the application process? <https://www.garfield.utah.gov/home/showpublisheddocument/2936/638682174258070000>

6.Or use the County ordinance that follows the inspection process by the County building department? (a requirement for the county to accept doing inspections.).

I understand the PC is working on Standards for Boulder that incorporate some of the County's ideas. The Town should have a yearly renewal process for ongoing RSTRs to make sure the regulations are being followed and taxes have been paid. If the RSTR is grossly out of compliance or out of business the permit should be cancelled and made available to someone else.

7.Are there any other regulations that should be considered? (Other than: The requirements that are in the Boulder RSTR Ordinance such as the night sky protection. Noise restrictions, Animal control, Rules for the guests requiring clear indications of private property lines, access limitations and dog control, plus Fire inspection by the Boulder Fire Authority for required fire access approval and outdoor fire pits. All will be considered as part of the revised ordinance. Plus possibly sharing the phone number of the owner/manager of the RSTR with the neighboring residents.)

I support the regulations you are considering. They are necessary and reasonable. Please keep in mind, Airbnbs most certainly DO effect neighbors and neighborhoods.

In closing I would like to reiterate that the Planning Commission and the Town Council are about to consider and vote on one of *the most important issues that will affect the future of Boulder Town*. A small number of RSTRs serve a purpose in our community and may even help some residents to make ends meet. However, the proliferation of RSTRs that may make a significant income for the homeowner, typically cause a cancer of escalating rents and a dearth of local housing. This upsets the balance and stability of the communities. We can see what has happened in other towns. Airbnbs have become ubiquitous. Many resort communities (like Boulder), that initially embraced the added short term tourism housing of airbnbs, are regretting their decisions and finding it's impossible to rescind these decisions that have totally destroyed the ability of local residents to find a place to live. This causes desperate hardships for established local businesses and also competes with lodges and motels. Neighborhood impacts abound. Your neighborhood is filled with strangers. Out-of-towners typically drive fast. This is especially a problem on the narrow Lower Boulder Road. There are noise issues, trespass, etc., etc. 'Planning', is looking into the future while making decisions about today. We already have serious housing issues. Please do not expand RSTRs. Please craft ordinances that make the RSTRs we have compliant with Boulder's quiet, rural lifestyle. To quote a famous bumper sticker: DON'T MOAB BOULDER

From: Matthew Cochran

Wed, Mar 12,
5:25 PM (16 hours
ago)

Public Comment For RSTR hearing and Planning Commission

To Boulder People,

I'm writing as former chair of the PC and as a resident who was present in creating the original RSTR ordinance. Ordinances are never perfect, and it is good to review them after some time. That said, the original intent was to restrict RSTR so as not to turn residential neighborhoods into everywhere america commercial zones. And also, to not eclipse long term rental possibilities, which are much more in line with the priorities of our General Plan. Originally we tried for a limit of 12 RSTR's total. Four for each of

the three zones and they had to be proven to be in use each year. In my opinion percentages are dangerous as they will only exponentially grow and fragment residential areas. In lower boulder, ironically 2 of the 4 RSTR's are on either side of me. And SLVF has its own thing going with short term rentals. As you might imagine I have been observing RSTR's up close for a number of years now. While I appreciate that a few focused residents can make some income, I'm also aware, as many of you may not be, that 3-7 nights a week I have no idea who my neighbors are. That is very different than my original experience in Boulder and reduces the neighborhood "feel" already.

I believe that the intrinsic value of Boulder as a place is worth protecting and that an economic advantage through more RSTR's would kill that value. It should be a privilege to have the opportunity to have one, and they should be strictly run with respect to the greater value of place and character.

As far as Lower Boulder is concerned - a one road in/one road out set up - I'm against more RSTR's. Add up the traffic for 4 RSTR's (plus SLVF short term rentals (3)), and you can at the very least quadruple the number of cars going up and down Lower Boulder in a day.

Though I haven't read through the County ordinance, The Planning Commission should customize our ordinance in a strict sense to upholding our General Plan, not to a basic cookie cutter generic set up based on something else. Enforcement provisions are important. The many requirements that already exist for RSTR's are each there by specific design and for legit reasons – to protect people like me, the neighbors, from disturbance. Public access to RSTR mangers by the neighbors if there are incidents would be a great additional requirement.

That said, just do the right thing, and don't equate economic advantage at the expense of intrinsic value. It wasn't so long ago everyone here knew how to make it without RSTR's, and with the zoom boom and online remote working – there more opportunities to make cash than have ever existed before that won't sell out our vision, our character and our place.

Thanks for your consideration.

Matthew Cochran

Jennifer Geerlings

10:08 AM (4 minutes ago)

To Boulder

Thank you, PC, for asking for community input on this important issue.

1. Do you want the economic opportunity to have an RSTR? How long do you imagine you would want to run an RSTR for additional income?

No. I am interested in Boulder having more available long-term housing, and RSTRs remove potential long-term rentals from the market. Renting a unit long-term does provide income. If our goal as a community is to maximize money-making opportunities for businesses or residents, we could allow a multi-story chain hotel in the middle of town. We could allow people to subdivide into as many lots as they want, wherever they want, to "maximize their profit." We don't do that. We use discretion and controls in our ordinances, hopefully thoughtful ones, because the character of a town, the nature of a

neighborhood, the open space and agricultural use, and people having places to live, are essential to our community and we need to protect and encourage their continued existence.

I do support a limited number of RSTRs, such as is set forth in our current ordinance.

2. Are the areas appropriately defined?

I support the changes for the RSTR zones suggested by the PC. The three areas (upper, middle, and lower Boulder) make sense, and are divided into distinct and easily identifiable areas. Controlling the number of RSTRs in each zone ensures that one neighborhood or zone does not have an overrepresentation of RSTRs. Lower Boulder has a significant amount of land that may be developed, and as a lower Boulder resident, I am grateful that lower Boulder is at its limit for this type of commercial activity.

3. Is the current limitation of RSTR at 15% of the permanent residence dwellings appropriate? (The reasoning for restrictions on RSTR was that they would take away from opportunities for much needed long-term rentals and they had an impact on the safety and well-being of neighborhoods).

Five RSTRs per zone has proved more than adequate. And for practical purposes, the town can simply use the five RSTRs per zone as its standard. But let's remember that the percentage formula has provided the town with solid data: As of this writing, it is my understanding that no one is on a waiting list for an RSTR and there are several zones that have several RSTR "slots" available; thus, we do not need more RSTRs. Some might argue that we don't need a limit because there isn't a deluge of applicants, but this ignores sound planning. We control water flow so we don't get flooded, and the community could decide to open the gates later. If all the zones are maxed out later, using the 15% formula can help evaluate if changes need to be made, and if the costs to the community associated with increased RSTRs are justified.

Currently, an RSTR could be held indefinitely by one RSTR holder. Maybe a 3-year (2 year?) time limit on each permit. If no-one is on the waiting list for your zone when your three-years permit is up, for example, you can extend your permit. But if someone is on the waiting list when your permit "expires," the RSTR holder with the longest running permit (more than the set time limit) would be the first permit to be released to the first applicant on the wait list, providing they meet the requirements.

If someone has an RSTR permit that has not been used, then that permit should be made available.

4. Should we change from a percentage to a number-based limitation?

We should keep the number limited to 5 per zone, for 15 total RSTR's for Boulder. The percentage does not need to be recalculated (using staff time). Should Boulder max-out its RSTRs, this formula could be used to help determine if changes are desired by the community; it does provide some guidelines to evaluation.

5. Should our town adopt the Garfield County Short Term Rental Standards in the application process?

Yes, so long as it adopts language reflecting the limits that Boulder has in place.

Are there any other requirements that should be considered? (Other than: The requirements that are in the Boulder RSTR Ordinance such as the night sky protection. Noise restrictions, Animal control, Rules for guests requiring clear indications of private property lines, access limitations and dog control, plus

Fire inspection by the Boulder Fire authority for required fire access approval and outdoor fire pits. All will be considered as part of the revised ordinance. Plus, possibly sharing the phone number of the owner/manager of the RSTR with the neighboring residents.)

It is important to emphasize that an RSTR is a *commercial* operation. It is a specialized motel located in a residential area. There are different zones, commercial, industrial, agricultural, residential, etc., and they are separated for a reason.

An RSTR is NOT the same thing as a long-term rental. A short-term renter, usually a tourist, does not raise their children here, volunteer on the fire department, get an EMT license, sit on the Town Council or Planning Commission, provide search and rescue, teach here, fix plumbing, install electricity, or repair cars. Tourists are important for our economy, but they are not neighbors. They are not community members. We should encourage more tourist lodging in commercial zones, if what we desire is more lodging.

An RSTR is also not the same, commercially, as a full-time resident with a small cottage business (e.g., someone who fixes cars, possibly in their spare time, on their lot). A car mechanic, in this example, is a resident who in this case is providing services for their community. While RSTRs provide some jobs for people who clean and maintain them, it would be interesting to find out if the people who have those jobs have secure housing.

Lastly, it would be helpful to clarify what the difference is between an Airbnb, B&B, and guest ranch. Garfield County recognizes that if lodging is advertising on Airbnb, VRBO, HomeAway, or similar platforms, it's an RSTR and needs to be treated as such.

Thank you again for asking the public for input. I appreciate all the hours and thought you put into being commissioners.

Jennifer Geerlings