

Ann Arbor Mayor and City Council Members
City Planning Commission
City Design Review Board

Re: Proposed hotel on Firestone location

I write to ask that you reject the proposal to build a hotel on the present Firestone Garage location. Our property, Parkhurst House, at 412 East Huron, adjoins the Firestone property and our property line will be right up against the proposed hotel.

First, it is important to understand a little of the background of Parkhurst House. Prior to our purchase of the property in 1999, the house had been designated as part of the Historic District. At present, it is located in an overwhelmingly commercial and non-historic area. Beginning about 12 years ago, the city has allowed tall commercial properties to surround us on three sides. First came the student housing highrise on Washington Street, right behind our property, then came the highrises to the east of us and across Huron Street. All three are in excess of ten stories. What little sunlight and feeling of space we now have come only from the Firestone property. The proposed hotel, which will apparently come right to our property line, will complete the total encirclement of our small two-story house by skyscrapers.

After the first highrise behind us was approved by the city and completed, we went to City Council and requested, because of the changed neighborhood, that we be allowed out of the historic designation. This was eleven years ago, and city council denied our request without following the procedure set out in the ordinance regarding the appointment of a study commission. We learned later that members of the Historic District had met with council members prior to the meeting to persuade them to deny our request. Then the city approved the second and third highrises, and the fourth is now to be considered.

Essentially, by encircling us with highrises while, at the same time, refusing to allow us to be removed from a historic district that is not in touch with reality, what the city has done is take our property from us. We are denied the use of that property free from hovering highrises. Property all around us is being sold for its fair market value. Witness the recent Firestone purchase. But the city denies us the right to sell our property at its fair value. The city labels us historic, but denies that status through its continuous actions approving commercial highrises surrounding us. The real world confirms that we are historic in name only.

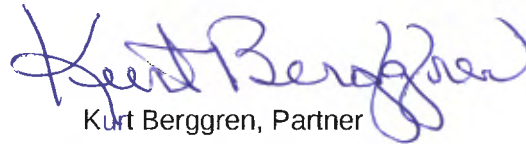
Now, regarding the proposed hotel. It is to be crammed into a too-small space with no parking and no allowance for greenery and trees. It will be a totally vertical structure built right up to our property line, hovering above us, further denying us and our longtime tenants the right to enjoy the property. During construction, there will be no room for construction vehicles, deliveries, or parking. Our property, including the cars parked on our property, will be subjected to all the effects of highrise construction, including dust, dirt, noise, falling debris, overhanging cranes,

and illegal traffic by delivery and utility vehicles that have no other place to stop. These nuisances, among others, will deprive our tenants of the right of quiet enjoyment given in the lease agreement.

In conclusion, it is our position that the hotel should not be approved as proposed and that our property should be removed from its historic restriction in recognition of the current reality. Our prior request to do so should be reopened and reconsidered in light of seriously changed circumstances. Under no circumstances should the hotel be approved if we, the most negatively affected citizens, continue to have our property designated as historic. The cumulative effect of approving all of these highrises has been to destroy our alleged "historicness."

The city has not treated us fairly. It is not too late to do the right thing. Thank you.

9/9/19

A handwritten signature in blue ink that reads "Kurt Berggren". The signature is fluid and cursive, with the first name "Kurt" and last name "Berggren" clearly distinguishable.

Kurt Berggren, Partner
On behalf of Parkhurst House, LLC
1420 Golden Avenue
Ann Arbor, Michigan 48104
(734) 665-9571

September 8, 2019

Dear Ann Arbor City Council and Planning Commission Members,

It was with great sadness and frustration that I learned that you were informed by your legal counsel (and the outside legal counsel you consulted with) that you had no legal grounds to deny the Trinitas developers from building their proposed student housing project at the Barton Green site off Pontiac Trail. I am a 37 year resident of Ann Arbor and have been active in opposing this project for the least several years. I am not writing to you to tell you that you should have gone against the legal advice you received, and tried to fight Trinitas in a long court battle. This city has lots of better things to spend money on than a hopeless lawsuit.

However, I am writing to you to implore you to use this **unfortunate incident to figure out what you can do in a proactive way to **prevent** future developers from being able to successfully build projects that are clearly not in the best interest of this city, or the ecological well-being of this planet.**

There is no doubt that this project is a **terrible project** for the following reasons which have been discussed by many citizens many times:

- 1) It contributes to global warming by placing students too far from campus such that they will drive cars instead of walking or bicycling to class and all their social events.
- 2) It will cause perpetual traffic jams because the project is hemmed in by a freeway and a river thus having very limited exit possibilities.
- 3) It will put heavy traffic with young drivers near school children.
- 4) It is poor planning to put a huge student development in a well-established family neighborhood. The students will not be happy living so far from campus, and the neighborhood will not benefit from such a large number of students plunked down in their neighborhood. It is clear some other type of development on this site would have made much better planning sense.

Yet despite all this, this development is going to happen. It is clear that there is something wrong with the zoning laws of this city. It is clear that you, the City Council and Planning Commission, need to start thinking **outside the box!** You need to immediately start brainstorming about what kind of innovative

laws **in addition** to traditional zoning laws can be developed, so the quality of life of this city is not ruined by greedy, shoddy, out of state developers, who care only about their own profit, not whether their projects are a positive addition to the city they are building in.

Of course there are lots of cities in this country that have hideous permeant traffic jams, and lots of lousy developments. There are lots of cities that are developed in a disorganized, lack of forethought kind of way. Let's learn from the mistakes of other cities, and do better. Ann Arbor has a long history of being a city concerned about environmental issues (we were one of the first cities around to recycle).

The obvious effects of global warming currently happening, should make this city more committed to developing our city in an ecological way, particularly in ways that decrease the need for automobile use NOT CREATE UNNECESSARY USE OF AUTOMOBILES!

We can't stop this development. But we can start working on developing innovative local legislation that will prevent this situation from happening over and over in the future: You need to invest some money in legal research to figure out how, in the future, the City of Ann Arbor can be **armed and ready to mount a successful legal fight against shoddy, quality of life decreasing developments like this in the future.**

I do not know what that legislation is, but with forethought, we can figure it out. Maybe it is something like the city taking a **proactive role** to get land developed in the city with positive projects, ones that we want to happen. Then maybe there would not be land owners sitting around with empty land who are tempted to sell it to shoddy developer like Trinitas. I am not an Urban Planner, so I will leave that task to all of you. I am begging you, as a very concerned citizen, to use this failure to figure out how we can build a city not crippled by horrible traffic jams, and that has ecologically sound development plans. This city is filled with lots of brilliant people and lots of ecologically minded people. Let's try to be a model for other cities not another city that **used to be** a nice place to live. As the old saying goes: "An ounce of prevention is worth a pound of cure." We should have been ready to prevent this city from being a sitting duck to a crappy developer like Trinitas.

Susan Mumm, MA
2416 Arrowwood
Ann Arbor, MI 48105

From: [Richard Mitchell](#)
To: [Planning](#)
Cc: [DiLeo, Alexis](#); [Kahan, Jeffrey](#)
Subject: Design Review Board input
Date: Thursday, September 26, 2019 11:36:10 AM

Planning Commissioners,

I thought I should give you a heads-up regarding a comment from a citizen at our Design Review Board meeting last week. A resident representing Sloan Plaza spoke about a site issue they have been experiencing ever since the construction of The Foundry to their west and the other apartment building to their east were completed.

He pointed out that each building is filled with students who generate in his words “hundreds” of food delivery or Uber/Lyft vehicles every day. Neither of the two new buildings have vehicular access off Huron and many of these delivery/ride vehicles, following the Huron Street address they have been given on their GPS, pull into Sloan Plaza’s access court, causing a blockage for their residents.

If you have not already heard from this person, you may.

Dick Mitchell, Design Review Board chair

From the Desk of –
Richard W. Mitchell AIA



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Medical Marijuana Ordinance Concerns in Ann Arbor, Michigan

To: City of Ann Arbor Planning Commission

Hello! My name is Kenneth Bryant. My family owns the Medicine Man of Ann Arbor, a city and state licensed medical marijuana facility. My father attended the University of Michigan and my mother Washtenaw Community. They got married in Ann Arbor my father's sophomore year of college and stayed in family living on North Campus. I attended the University of Michigan and my brother, also owner, attended Eastern Michigan University. So we all fell in love with Ann Arbor decades ago and would like to remain here for decades to come.

I am writing to give some insight into how the current medical marijuana ordinance will effect the businesses operating. We were one of the operating dispensaries to be "grandfathered" in and operate as a temporary operator while seeking our State license and City permit. We were pleased to be one of the first to attain both our State license and City permit in the City of Ann Arbor. Our unit of operations is very small and we always planned to "grow" into a bigger unit to operate. While reading the ordinance, it is very clear that there is a cap of 28 on the dispensaries. What isn't clear is that there is a cap on the SEU's as well. This cap on the SEU's isn't written in the ordinance and is unknown until you actually attempt to move. Which was our case. Our landlords decided they wanted more compensation for allowing us to operate in their building. We couldn't reach an agreement and went on the search for a new location. We found 3 different green zoned locations and was ready to amend our Ann Arbor permit as the ordinance states this must be done 90 days before our license expires. As we put in our request to move, we were told that the Planners (I'm not sure if the Planning Commission or the City Planners) have decided to cap the SEU's at 28 as well. This is where all hell broke loose. By capping the SEU's, the businesses with leases are at high risk. Landlords have an incentive to find ways to break current leases in efforts to bring in a new dispensary who is willing to pay a premium to get the current operating business evicted. Landlords also can just start up one themselves after traffic has been established by the original business. We don't mind the SEU's sitting with the land and landlords, but by capping the SEU's you create an environment that puts operating businesses at jeopardy for aggressive landlords to evict and collect premiums from new tenants or

to start their own dispensary. This also hurts those in the que. Those in the que who have been waiting for over a year, will be jumped over by a brand new company who goes into an already approved. SEU location. So in our instance, a brand new company who just started their application process to operate will jump over the businesses who are patiently waiting in the que.

I think a simple solution isn't to remove the cap entirely from the SEU's, but allow businesses such as ours who have both a State license and City permit to be allowed to apply for a new SEU and relocate their business and not lose their license. At this point, anyone with a lease is subject to their landlords deciding whether the business lives or dies and I don't think that's fair to the businesses. Businesses, such as ours, who have worked relentlessly to break stigmas and start such a compassion-driven business to only be squeezed out by corporate greed. By allowing businesses with both State license and City permit to move with a new SEU, this still allows the land and landlord with the SEU to open a marijuana facility, but it doesn't allow the new potential business to "skip the line" in front of those in the que. The dispensary permit cap of 28 will not be effected by this. This allows the businesses to survive, not be at the disposal of their landlords. Otherwise, businesses like us will have to start over again at the back of the line, as though we never existed in the first place.

By the SEU cap being an "unwritten rule", which isn't clearly stated in the ordinance, we implemented a strategy that wasn't even plausible. Our approach was to attain 1 of the 28 licenses, and move into a new location if need be. I'm not even sure why the ordinance has a section referring to amending one's location in efforts to keep 1 of the 28 licenses, because it's not needed. You'd just need to attain possession of 1 of the already approved SEU's and just get a license there. You don't have to keep and move your current license. You can just get a new one at your new location, because of the SEU cap. The way the ordinance is written seems to be prior to when the city decided to also cap the SEUs. There should be a way current businesses with both State license and City permit can take their City permit and move it to a new green zoned location.

All of the above is what I truly think would make a fair playing field for both the businesses and the landlords. Allow businesses with both a State license and City permit to seek a new SEU in attempts to keep their business alive, especially all the jobs for their employees. The landlords still have a property with an SEU and can bring in a new business to attain 1 of the 28 dispensary permits, but shouldn't be able to strip the current business of their dispensary permit, because of a landlord-tenant contract dispute.

Our attorneys want to attempt to keep our business operating with as least resistance as possible and thus searching for easier methods of keeping our business alive. We are attempting to understand who is in the que for remaining SEUs and which number we would be if applied now. Do we qualify for a special emergency relief move given our circumstances and given that the SEU cap isn't

written in the ordinance? Will the cap on dispensaries increase given adult use becoming active soon, and we can attain one of those permits? We are extremely open to any solutions you can provide us. We just think it's a shame that a business can be at the mercy of it's landlord as to whether or not it survives or dies. The operations and business practices of the entity itself should determine its fate and destiny. The SEU's can and should remain with the property, but the dispensary permits should be protected for the actual business dispensing.

We've collected hundreds of signatures from patients who support our business practices and do not want to see us go out of business. We've submitted these signatures to City Planner, Jill Thacher. She has informed us that Brett Lenart has all of our materials submitted and he's looking into our case.

We respectfully and humbly ask for assistance in granting our business with a special emergency relief move by allowing Planning to approve more than 28 SEUs, as the 28 dispensary permits will not be effected by doing so.

Thank you,
Ken Bryant
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Lenart, Brett

From: Kirk Westphal <writetokirk@gmail.com>
Sent: Monday, September 23, 2019 10:07 AM
To: Planning
Subject: parking reform

Dear Commissioners,

I'm guessing some of you may have already seen this excellent piece, but I thought it was important enough to pass along anyway. We already do many things right in Ann Arbor, but I'm more than happy to chat about opportunities to implement more parking reforms (particularly eliminating minimums and ratcheting down maximums outside the downtown) as a tool for lowering housing costs.

Thank you as always for your hard and urgent work toward making the city more livable and accessible for all!

Best,
Kirk (734-660-9955)



For those who dream of reclaiming America's parking lots, a new day is coming. Mark Blinch/Reuters

PERSPECTIVE

Parking Reform Will Save the City

Cities that require builders to provide off-street parking trigger more traffic, sprawl, and housing unaffordability. But we can break the vicious cycle.

SEP 20, 2019



DONALD SHOUP

Distinguished professor of urban planning at UCLA

At the dawn of the automobile age, suppose Henry Ford and John D. Rockefeller had asked how city planners could increase the demand for cars and gasoline. Consider three options. First, divide the city into separate zones (housing here, jobs there, shopping somewhere else) to create travel between the zones. Second, limit density to spread everything apart and further increase travel. Third, require ample off-street parking everywhere so cars will be the easiest and cheapest way to travel.

American cities have unwisely adopted these three car-friendly policies. Separated land uses, low density, and ample free parking create drivable cities and prevent walkable neighborhoods. Although city planners did not intend to enrich the automobile and oil industries, their plans have shaped our cities to suit our cars. As John Keats wrote in *The Insolent Chariots*, "The automobile changed our dress, manners, social customs, vacation habits, the shape of our cities, consumer purchasing patterns, and positions in intercourse." Some of us were even conceived in a parked car.

Parking requirements are particularly ill-advised because they directly subsidize cars. We drive to one place to do one thing and then to another place to do another thing and then drive a long way back home, parking free everywhere. A flood of recent research has shown that parking requirements poison our cities, increasing traffic congestion, polluting the air, encouraging sprawl, raising housing costs, degrading urban design, preventing walkability, damaging the economy, and penalizing everyone who cannot afford a car.

Despite all the harm off-street parking requirements cause, they are almost an established religion in city planning. Without a theory or data to support them, planners set parking requirements for hundreds of land uses in hundreds of cities – the ten thousand commandments of planning for parking. Planners have adopted a veneer of professional language to justify the practice, but planning for parking is learned only on the job and it is more a political activity than a professional skill.

One should not criticize anyone else's religion, but I'm a protestant when it comes to parking requirements – and I believe city planning needs a reformation.

The price we really pay to park for nothing

America is a free country, and many people seem to think that means parking should be free. Parking requirements enable everyone to park free at everyone else's expense and no one knows that anyone is paying anything. Parking is free, however, only because everything else is more expensive.

A recent study found that the parking spaces required for shopping centers in Los Angeles increase the cost of building a shopping center by 67 percent if the parking is in an aboveground structure and by 93 percent if the parking is underground. Retailers pass this high cost on to all shoppers, regardless of how they travel. People who cannot afford a car pay more for their groceries so richer people can park free when they drive to the store.

That's true for housing, too. Small, spartan apartments cost less to build than large, luxury apartments, but their parking spaces cost the same. Because many cities require the same number of spaces for every apartment regardless of its size or quality, the required parking disproportionately increases the cost of low-income housing. One study found that minimum parking requirements raise housing costs by 13 percent for families without cars.

A city where everyone happily pays for everyone else's free parking is a fool's paradise.

Indeed, a single parking space can cost more than the net worth of many U.S. households. One study found that in 2015 the average construction cost (excluding land cost) for parking structures was about \$24,000 per space for aboveground parking and \$34,000 per space for underground parking. By comparison, the U.S. Census of Wealth and Asset Ownership in 2015 found that the median net worth (the value of assets minus debts) was \$110,500 for white households, \$19,990 for Hispanic households and \$12,780 for African American households. One space in a parking structure, therefore, costs more than the entire net worth of more than half of all Hispanic and black households in the country.

This mandate to provide homes for automobiles has devoured vast amounts of land. Parking lots typically have about 330 square feet per space. Because there are at least three off-street parking spaces per car in the United States, there are at least 990 square feet of off-street parking space per car. In comparison, there are about 800 square feet of housing space per person in the United States. The area of off-street parking per car is thus larger than the area of housing per human.

In astronomy, dark energy is a force that permeates space and causes the universe to expand. Similarly, in urban planning, parking requirements are a force that causes cities to expand. The higher the parking requirements, the stronger the dark energy that spreads cities out and rips them apart.

The most emotional topic in transportation

Few people are interested in parking itself, but parking strongly affects issues people do care strongly about, such as affordable housing, climate change, economic development, public transportation, traffic congestion, and urban design. Parking requirements reduce the supply and increase the price of housing. Parking subsidies lure people into cars from public transportation, bicycles, or their own two feet. Cruising for curb parking congests roads,

pollutes the air, and adds greenhouse gases. Do people really want a drive-in dystopia more than they want affordable housing, clean air, walkable neighborhoods, good urban design, and a sustainable planet?

But most people consider parking a personal issue, not a policy problem. They follow the axiomatic observation of George Costanza in *Seinfeld*, who famously said that paying for parking was like going to a prostitute: “Why should I pay when, if I apply myself, maybe I can get it for free.”

Parking clouds people’s minds, shifting analytic faculties to a low level. Rational people quickly become emotional; staunch conservatives turn into ardent communists. Thinking about parking seems to take place in the reptilian cortex, the primitive part of the brain said to govern behavior like aggression, territoriality, and ritual display – all factors in parking.

Some strongly support market prices – except for parking. Some strongly oppose subsidies – except for parking. Some abhor planning regulations – except for parking. Some insist on rigorous data collection and statistical tests – except for parking. This exceptionalism has impoverished thinking about parking policies. If drivers paid the full cost of their parking, it would seem too expensive, so we expect someone else to pay for it. But a city where everyone happily pays for everyone else’s free parking is a fool’s paradise.

Off-street parking requirements are what engineers call a “kludge” – an awkward but temporarily effective solution to a problem. In this case, the problem they address is a shortage of free on-street parking. But severing the link between the cost of providing parking and the price that drivers pay for it increases the demand for cars, and when citizens object to the resulting traffic congestion, cities respond by restricting development to reduce traffic. In other words: Cities are limiting the density of people to limit the density of cars. Free parking has become the arbiter of urban form, and cars have replaced humans as zoning’s real density concern.

Planners typically assume that every new resident will come with a car, so they require developers to provide enough off-street parking to house all the cars. Ample free parking then ensures that most residents do want a car. Parking requirements thus result from a self-fulfilling prophecy.

Improving parking policies could be the cheapest, quickest, and most politically feasible way to achieve many social, economic, and environmental goals.

Planners often use “motivated reasoning” to justify the parking requirements required by elected officials who want enough parking to ensure that citizens won’t yell about a shortage of free parking. Then they must fashion arguments for conclusions already reached. Assumptions are the starting point of most parking requirements, and the person who makes the assumptions determines the outcome. Instead of reasoning about parking requirements, planners must rationalize them, and feign expertise they do not have. I have never met a city planner who could explain why any parking requirement should not be higher or lower. To set them, planners usually take instructions from elected officials, copy other cities’ parking requirements, or rely on unreliable surveys. Parking requirements are closer to sorcery than to science.

The three essential parking reforms

The upside of parking requirements is that removing them can trigger a cascade of benefits: shorter commutes, less traffic, a healthier economy, a cleaner environment, and more affordable housing. Vast parking lots can evolve into real communities. There’s an accidental land reserve available for job-adjacent housing. If cities remove their parking requirements, we can reclaim land on a scale that will rival the Netherlands. Economic objectives often conflict with environmental objectives, but parking reforms can serve both.

To distill the 800 pages of my 2005 book *The High Cost of Free Parking* into three bullet points, I recommended three parking reforms that can improve cities, the economy, and the environment:

1. Remove off-street parking requirements. Developers and businesses can then decide how many parking spaces to provide for their customers.
2. Charge the right prices for on-street parking. The right prices are the lowest prices that will leave one or two open spaces on each block, so there will be no parking shortages. Prices will balance the demand and supply for on-street spaces.

3. Spend the parking revenue to improve public services on the metered streets. If everybody sees their meter money at work, the new public services can make demand-based prices for on-street parking politically popular.

Each of these three policies supports the other two. Spending the meter revenue to improve neighborhood public services can create the necessary political support to charge the right prices for curb parking. If cities charge the right prices for curb parking to produce one or two open spaces on every block, no one can say there is a shortage of on-street parking. If there is no shortage of on-street parking, cities can then remove their off-street parking requirements. Finally, removing off-street parking requirements will increase the demand for on-street parking, increasing the revenue to pay for public services.

Assembling support for parking reform is like opening a combination lock: Each small turn of the dial seems to achieve nothing, but when everything is in place the lock opens. These three reforms can open the parking combination lock.

Some critics argue that removing an off-street parking requirement amounts to “social engineering” and a “war on cars.” Instead, off-street parking requirements are a socially engineered war *for* cars. Removing a requirement that restaurants provide 10 parking spaces per 1,000 square feet of floor area is no more a war on cars than removing a requirement that everyone must eat in restaurants 10 times a month would be a war on restaurants.

The parking revolution has already started

When *The High Cost of Free Parking* was published in 2005, half the city planning profession thought I was crazy and the other half thought I was daydreaming. Since then, several cities – including Buffalo, Hartford, Minneapolis, and San Francisco – have removed all their parking requirements, and many others have removed requirements in their downtowns. Mexico City has converted its minimum parking requirements into maximum parking limits while leaving the numbers almost unchanged. What once seemed politically impossible may slowly become the new normal.

Repealing off-street parking requirements and replacing them with market prices for on-street parking may at first glance seem like Prohibition, or the Reformation – too big an upheaval for society to accept. But it can attract voters across a wide political spectrum. Conservatives will see that it reduces government regulations. Liberals will see that it increases public spending. Environmentalists will see that it reduces energy consumption, air pollution, and carbon emissions. Urban designers will see that it enables people to live at higher density without being overrun by cars. Developers will see that it reduces building costs. Residents will see that it improves their neighborhood public services. Drivers of all political stripes will see that it guarantees convenient curb parking. Elected officials will see that it depoliticizes parking, reduces traffic congestion, allows infill development, and provides public services without raising taxes. Finally, planners can devote less time to parking and more time to improving cities.

Recognizing that our parking policies block progress toward many critical goals may help spark this planning reformation; simply improving parking policies could be the cheapest, quickest, and most politically feasible way to achieve many social, economic, and environmental goals. Cities will look and work much better when prices – not planners and politicians – govern decisions about the number of parking spaces. Like the automobile itself, parking is a good servant but a bad master.

This piece is adapted from Parking and the City (Routledge 2018).

About the Author

Donald Shoup

Donald Shoup is a distinguished research professor of Urban Planning in the Luskin School of Public Affairs at the University of California, Los Angeles.

From: [Brooke Helppie McFall](#)
To: [Planning](#)
Subject: Short-term rental policy thoughts
Date: Wednesday, September 25, 2019 3:58:51 PM

Hi there,

I can't attend the meeting (work and family obligations prevent this), but would like to weigh in. I think VRBO and AirBnB provide useful services, and the goal should be regulating their use so that the services serve the community as well as the renters and homeowners.

Thoughts:

- (1) My main concern about allowing short-term rentals is that these will further put pressure on home and rental prices in Ann Arbor. A regulation to prevent this would be to allow short-term rentals to be rented out only a small percentage of the time. For example, Football Saturdays and a week or two here and there, such that VRBO and AirBnB could be used by resident homeowners and long-term renters while those residents are occasionally out of town without encouraging real estate investors to buy properties solely for short-term rental purposes. I think the former, combined with some rules and enforcement, could serve everyone in the community well (extra income and tax revenue, efficient use of space while people are out of town, etc), while the latter would exacerbate the affordable housing crisis.
- (2) There should be a city tax for short-term rental that fully pays for all enforcement and administrative costs related to or caused by use of these services, or even that reduces taxes for the rest of us so there is a general perception of a benefit from the short-term rentals beyond enriching the owners/those receiving the rental income. If the property tax rate on rentals is higher than on personal residences, this extra tax should also include some tax to bring the property taxes on short-term rentals in-line with those of long-term rentals for the periods of time during which they are rented (ie, pro-rate for the portion of the year for which the property is rented out).
- (3) Short-term rentals should be registered with the city and should have to adhere to certain quality and safety standards, similar to long-term rentals.

Thank you,
Brooke McFall
1503 Granger Ave.