

From: [Perry Boyle](#)
To: [Participate](#)
Subject: Public Comment STR Ordinance 1230 for 12/6 City Council Meeting
Date: Saturday, December 4, 2021 3:08:37 PM

Dear Council Members,

The Affordable Housing Coalition of Ketchum strongly endorses Ordinance 1230, and applauds the City for taking this step.

While we believe the Ordinance is well-constructed, we make several suggestions to strengthen the Ordinance.

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In general,

1. there is inconsistency as the to use of numbers vs. letters for sub-points in the chapters.
2. Infraction penalties seem light, particularly given room rates for STRs.
3. We would also suggest an infraction penalty for failure to remit occupancy tax within the required time period, consistent with penalties for other similar payments the City collects.
4. We did not notice the charge for the license. We would suggest making it as high as practicable, recognizing the City may be limited by state law on this. But it also seems reasonable that High Occupancy STRs pay a higher license fee given the higher cost of creating that license.

5.09.030

H. We suggest a grace period of 90 days. If it is a year, most people will delay until the end of the grace period. 90 days is plenty of time and puts owners on notice that they need to get their houses in order (literally). This is a public safety issue. Perhaps an owner could apply for a grace period extension if extensive renovations are required?

I. We suggest a minimum of three nights, under the principal of neighborhood integrity protection, as this will reduce the potential for the weekend party house situation.

New J. If hotels are require to be inspected by the fire department for safety, we believe STRs should comply with that standard, cost to be borne by the property owner, on the same timing requirement (annually?). The City could deputize local agents to perform the inspection if there is not enough staff to do so.

5.09.040

1.a.2 perhaps add in language that the City reserves the right to inspect the unit and withhold a license if the Inspection shows a safety deficiency

1.2. on Inactivity—some of the standards in this section are not relevant to the concept of inactivity (e.g. Parking). If the standard is a standard, perhaps include it in the general standards requirements of section 1.

2.1.1 for trailers/RVs can we specify that they cannot be occupied on the site of the STR

5.09.050

A. Is this capacity for 20, or occupancy of 20 at the time of rental? Might be clear if it applies to 5 bedrooms or more.

D. This is the first P&Z reference in the Ordinance. Is it the intention that P&Z approve the licenses of all High Occupancy STRs? If so, would make that explicit.

5.09.060

B.a. we suggest a single warning, and escalating penalties for multiple infractions in F

F. While we are not aware of the rules around what the City can legally charge for infractions, we believe \$100/night is not a meaningful penalty.

We suggest that the penalty be the rental rate charged by the owner plus \$100/night for the first 7 nights of violation, and the room rate plus \$500/night for subsequent nights of violation.

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As a next step beyond this Ordinance (1230), we ask that the Council task the new housing person to explore how to limit the number of STRs by block/neighborhood/zone in all zoning areas that are not zoned “tourist,” especially those with residential zoning.

This is important to “protect the integrity of residential neighborhoods” as permitted under Idaho law. The current ordinance strikes a “fair” tone with one per parcel, but we could end up with an entire block and/or neighborhood of STRs. This has occurred in other cities, and once it does, it is much harder to reverse than to prevent in the beginning.

We would not hold up passage of 1230 for determination of appropriate limits. The ordinance can be amended in the future for this.

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Ordinance 1230 is a strong move forward to protecting the character of Ketchum in conformity with the Comprehensive Plan and with state law.

Thank you for your service to the community.

Respectfully,

Perry Boyle, President
Affordable Housing Coalition of Ketchum