

## Adam Zack

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**From:** BrianLSilverstein <briansilverstein@gmail.com>  
**Sent:** Thursday, November 30, 2017 12:00 PM  
**To:** Comp Plan Update  
**Subject:** Vacation Rentals are underestimated

The County has performed a thorough review of housing needs. Reading the Housing Needs Assessment Briefing, slides 30-33, I believe that the analysis of Vacation Rentals, and therefore its impacts on future housing availability, are underestimated. There may be two biases in the analysis.

### **Recent Experience vs. 10 Year Trend**

The trend line on slide 32 uses only 3 data points for (total) Vacation Rental Permits - 2000, 2010 and 2015. Looking at slide 31, applications for Vacation Rental Permits are essentially flat from 2000 - 2013, while from 2013 - 2016 the annual increase in VRs nearly doubles. The statement "VR units have grown modestly over the past 10 years" is true, but not reflective of recent experience.

I also observe that New Dwellings dropped significantly from 2007 to 2011 and have been essentially flat since then. The statement "New dwelling unit permits have steady declined" also does not reflect recent experience.

The finding on slide 31 is that the ratio of new dwelling Permits to VR Permits has dropped from 5.5 to 2.18. If the recent trends continues, VR permits are likely to exceed new dwelling permits.

### **Use of VR Permit Data**

I understand that VR Permit Data is readily available. Anecdotal information suggests that the number of Permits underestimates the number of VRs. In the Home Owners Association where I live there have been two VRs. Neither has a permit. Owners do not get permits to avoid taxes, fees and conflicts with HOA Covenants.

### **Recommendations**

- use all of the historical data on VRs and display moving averages to forecast future trends
- estimate VRs without permits

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