



To: Denver City Council  
Date: June 13, 2016  
Re: Short-Term Rental Ordinance  
From: Mike Copps, Executive Director, Vacation Rental Managers Association

Dear Honorable Council Members:

The Vacation Rental Managers Association (VRMA) is a 31-year old international trade association representing professional property managers of traditional short-term vacation rentals. We support your efforts to legalize short-term rentals in your community. However, best practices have demonstrated that restricting renting to primary residences only are difficult and costly to enforce and do not accomplish the goals you are trying to achieve.

The VRMA supports fair and effective regulations. We agree with the United States Conference of Mayors resolution which states that “onerous regulations of short-term rentals can drive the industry underground, thus evading local regulations and local hotel taxes”, and, “fair regulation of short-term rentals ensures greater compliance and greater receipt of local hotel taxes”. Opening short-term renting to secondary residences helps remove barriers that confuse property owners and provides parity with primary residences.

Across the country communities develop STR regulations because of fears based on a host of erroneous assumptions. Many of these communities come to realize that primary residency requirements may alleviate fears but do not solve problems that arise. Cities also come to find out that their own rules are harder to enforce than they first realized. The uniform enforcement of existing noise and safety ordinances are what actually protects residents.

The U.S. Census Bureau’s most recent statistics equate 2,200 properties as secondary homes in Denver. This is less than 1% of total household units in the city. These homes are used by individuals for many reasons including to use as a vacation home or a future home to retire too. These individuals pay property taxes and contribute to the Denver economy.

These properties may sit vacant for long portions of the year. Allowing for secondary home rentals protects neighborhood character. Managers and property owners work diligently to protect their assets by scrutinizing potential renters and keep up on the maintenance of the home. Vacation rentals are often better maintained than long-term rental properties because of the need for cleaning and upkeep between guests.

Traditional short-term rentals, or vacation rentals, are a travel option around the world and the positive impact of the activity affects communities everywhere. Recent economic impact studies show communities with effective and easy-to-follow regulations achieve the greatest rate of compliance, overall financial impact and job growth. The Colorado Office of Tourism’s Longwoods International Report attributes \$2.625 billion in



expenditures occur in this Colorado because of legal short-term vacation rentals. Overzealous regulations will directly impact the over 155,000 travel and tourism jobs in the state.

The VRMA urges the Denver City Council to amend the proposed short-term rental ordinance and allow for secondary residences to equally participate in this growing sector of your economy.

Thank you,

Mike Copps  
Executive Director,  
Vacation Rental Managers Association

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**Subject:** VRMA Letter- Amend Ordinance to Allow Secondary Home rentals  
**Date:** Monday, June 13, 2016 12:15:08 PM  
**Attachments:** [image001.png](#)  
[VRMA- Denver Council Letter- June 2016.pdf](#)

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Dear Honorable Council Members,

Please find our attached letter defining our position on your proposed short-term rental regulations.

Thank you,



**Greg Holcomb**

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**From:** [Cmden10@aol.com](mailto:Cmden10@aol.com)  
**To:** [denc - City Council](#)  
**Subject:** Comment on CB16-0261 and CB16-0262 STR hearing City Council 6/13 5:30 PM  
**Date:** Sunday, June 12, 2016 6:30:36 PM

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Members of the Denver City Council:

Thank you for the opportunity to give you our comments on the proposed Short Term Rental ordinance CB16-0261 and CB16-0262:

We moved to Park Hill because it is a lovely family neighborhood. As neighbors, we look out for each other, we help each other and we enjoy getting to know who is living around us. The Denver Police Dept. says your best bet to deter crime is to know your neighbor's, be able to recognize when something is off, to know who belongs where. We are disappointed that the City Council is trying to change this without it being a vote of the 'people', who live in Denver, who will be affected the most.

If this passes, we strongly encourage it to be ONLY approved for residents for their "primary home". We could not find any definition for primary home in the ordinance. Would someone who lives in another state be able to short term rent their Colorado "primary home"? What number of days in residence constitutes a primary residence?

Our concerns:

- From the last Council Meeting we learned that there will be no additional enforcement staff. If we are unable to enforce the current illegal STR's with the staff you have now, how will you manage landlords who may continue to rent "under the covers", the issuance and monitoring of licenses, safety inspections and complaint investigation in a timely manner?
- Parking is very tight in most neighborhoods. Many houses do not have garages so depend on street parking for themselves and their guests which could be in competition with an STR with multiple guests.
- Will the ordinance control how many people can rent an STR based on the size of the house (number of bedrooms)?
- Denver already has a very challenging rental market. We believe STR's could decrease the availability of "reasonable" long term rentals.
- Selling a home could be more difficult next to an STR, especially if there are multiple STR's on a street. Will there be a limit as to the number of STR's per block or neighborhood?
- STR owners should be required to notify neighbors of their address and phone numbers so they can be reached in case of emergency or issue with renters. STR owners should also be required to notify guests of Denver's noise ordinances.
- When complaints are filed, STR tenants could already be gone by the time enforcement is investigating. How will they determine if a complaint is valid?
- We have heard from STR owners that there will be no problems with STR renters, that there are many more problems with long term renters and property owners. I think we can all agree that it depends on the renter or owner. Long term renters and owners would be more likely to be "working", whereas STR renters are on vacation or here for family or business interests and not on the same 'clock' as owner residents.
- We would like to see large fines and loss of use of the property for an STR for a period of one year if it is found that the property is not licensed. Fines for complaints need to be high enough to elicit compliance with the rules of the ordinance.

Thank you for your attention to our concerns. Please remember that some residents feel you are so fixated on how to make this work for STR owners that you have forgotten that it is equally important on how it works for homeowners living in neighborhoods they counted on to not become "commercial".

Respectfully,  
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