TO: Loudoun County Planning Commission  
FROM: Michelle Lohr, Project Manager, Planning and Zoning  
Daniel Galindo, AICP, Assistant Director, Planning and Zoning  
DATE: September 1, 2022  
RE: September 8, 2022, Planning Commission Work Session  
ZOAM-2018-0001, SHORT TERM RESIDENTIAL RENTALS

PURPOSE
The purpose of Zoning Ordinance Amendment (ZOAM)-2018-0001 (STRR ZOAM) is to amend the Revised 1993 Loudoun County Zoning Ordinance (Zoning Ordinance) to add new short-term residential rental (STRR) uses to include: 1) the Short Term Rental-Residential Accessory (STR-RA) use, which is an accessory use to an owner’s principal dwelling unit; and 2) the Short Term Rental-Commercial Whole House (STR-CWH) use, which is a principal use located in a single family detached dwelling that is solely used as a STRR use. The STRR ZOAM proposes to specify the zoning districts that permit the STR-CWH use either by-right, with Minor Special Exception (SPMI) approval, or with Special Exception (SPEX) approval; establish new definitions for the STR-RA and STR-CWH uses; and establish new additional regulations for the STR-RA and STR-CWH uses to mitigate and/or otherwise address the impacts of these new STRR uses.

STAFF RECOMMENDATION
Staff supports a Planning Commission (Commission) recommendation of approval to the Board of Supervisors (Board) of the draft text for ZOAM-2018-0001 as provided in Attachments 1, 2, and 3.

PROPOSAL: The Proposed Amendments are consistent with Board direction to staff during adoption of the Resolution of Intent to Amend (ROIA) the Zoning Ordinance. All proposed changes to the language of Zoning Ordinance are summarized in the June 28, 2022, Planning Commission Public Hearing item and presented as “redline text” within Attachments 1, 2 and 3.  

1 View the June 28, 2022, Planning Commission Public Hearing item here; view the meeting video here.
BACKGROUND

Over the past several years, online platforms and apps offering rooms within private residences or the entire residence for short-term rent have gained prominence in the travel and hospitality markets. Currently, the Zoning Ordinance does not list STRR uses as permitted in any zoning district and property owners wishing to operate these uses now must comply with the regulations that apply to either the Bed and Breakfast Homestay, Bed and Breakfast Inn, Country Inn, Rural Retreat, and/or Rural Resort Establishment. Such uses are only permitted in certain zoning districts, most of which are in western Loudoun County. The existing regulations that govern these uses do not fully address the unique characteristics and impacts of the STRR uses.

On July 18, 2019, the Board adopted (9-0) a ROIA to formally initiate the STRR ZOAM. Staff later determined that the ROIA did not permit staff to develop recommendations specific to commercial whole-house rentals even though the July 18, 2019, meeting and prior items identified the concept of commercial whole-house rentals as an item that would be considered during the STRR ZOAM process and that recommendations on this issue would be forthcoming. In addition, staff received further feedback from organizations and stakeholders during the initial outreach process, which took place in early September of 2019, indicating an interest in having the Board consider commercial whole-house rental regulations. Subsequently, on October 17, 2019, the Board adopted (9-0) a revised ROIA to establish STRR uses as a new accessory use to residential uses, establish commercial whole-house rentals as a new principal use type in zoning districts permitting residential uses, and establish new additional use regulations, performance standards, and definitions to address STRR uses (Attachment 4).

Planning Commission Public Hearing: The Commission held a Public Hearing\(^2\) for the Proposed Amendments on June 28, 2022, during which six speakers provided public comment. Five of the speakers were operators or representatives of short-term rental businesses that discussed issues such as potential grandfathering for businesses currently operating, effects of proposed setback requirements on existing structures, and the ability to operate a short-term rental in an accessory dwelling. A sixth speaker inquired regarding maintenance responsibilities for the property as well as whether homeowner association rules would supersede zoning regulations. Staff has received no comments on the Loudoun Online Land Application System (LOLA). The staff reports and associated attachments, can be viewed online at [www.loudoun.gov/lola](http://www.loudoun.gov/lola); search “ZOAM-2018-0001.” The Planning Commission voted (8-0-1: Salmon absent) to send ZOAM-2018-0001 to a Work Session for further discussion.

\(^2\) View the June 28, 2022, Planning Commission Public Hearing item [here](http://www.loudoun.gov/lola); view the meeting video [here](http://www.loudoun.gov/lola).
UPDATES

Response to Commission Requests: The following information is provided in response to Commission requests at the July 26, 2022, Planning Commission Public Hearing.

1. Request: More information was requested on the potential impacts the Short-Term Rental – Commercial Whole House use can have on affordable housing.

   **Staff Response:** The Department of Housing and Community Development (DHCD) has provided feedback, included in Attachment 5, regarding both the proposed STR-RA and STR-CWH uses. In general, DHCD is supportive of the proposed language in Sections 5-669(H) and 5-670(K) that prohibits Affordable Dwelling Units (ADUs) and Unmet Housing Needs Units (UHNUs) to be used as STRRs, as the issue was addressed in response to a DHCD concern during the original referral. DHCD would also suggest expanding the restriction of any type of affordable units (restricted to 0-100% of AMI), including units labeled “workforce units” that were not proffered as “UHNUs.”

   DHCD continues to have concerns about the potential impacts of short-term rentals, both STR-RA and STR-CWH, on affordable housing in the County, including reduction of more affordably priced home inventory, elimination of much-needed smaller housing options, impact on rural/farm workers housing, and other impacts outlined in Attachment 5.

   In Attachment 5, DHCD provided information regarding a 2021 study by Carnegie Mellon including a finding that: “The presence of Airbnb units caused a larger reduction in rental supply, especially among affordable units, which harmed local renters. But Airbnb units also created a larger market expansion effect for affordable housing, which benefited local hosts who owned affordable units and may have been less economically advantaged.”

2. Request: A request was made for more information regarding how third-party compliance could be handled. Concern was raised regarding the possibility of heavy-handed enforcement.

   **Visit Loudoun Response:** Municipalities across Virginia and throughout the country are utilizing third-party platforms to help monitor short-term residential rental (STRR) activity as well as a variety of other applications. The services offered by Granicus (Host Compliance) and others like Airdna provide a suite of services, including but not limited to:

   - Scraping dozens of short-term rental websites including Airbnb, VRBO, HomeAway, TripAdvisor, and Booking to aggregate a database of listings for municipalities.
Monitoring multiple STRR and vacation rental platforms to assist Loudoun in the permitting and compliance process, such as for licensing, health inspections and the collection of room tax as required by local ordinance.

Verifying properties used as STRRs and verifying addresses and listings within the County.

Providing reports to understand the scale and scope of STRRs in Loudoun as well as estimating occupancy (use) and rental revenue.

Sending communication directly to hosts on the county’s registration process, the collection and remittance of all applicable taxes, as well as zoning and permitting information.

May serve as a 24/7 hotline regarding non-emergency short-term rental related problems for neighbors and guests.

Identifying non-compliant properties and streamlining outreach efforts on behalf of the County.

Background: Visit Loudoun contracted with STRR data provider Host Compliance and received data from March 2019 through December 2020. As outlined in the MOU with the County, Visit Loudoun would be pleased to work with the County on the RFP process, outreach, and provide insight regarding the selection of the provider that best fits Loudoun’s identified needs.

Beth Erickson from Visit Loudoun will be in attendance at the Work Session and available to discuss this issue with the Planning Commission.

3. **Request:** Will the property maintenance requirements for the STR-CWH use be the same as for single family dwellings?

   **Staff Response:** Yes, for the regulations the County enforces. Regulations for egress and minimum sizes for bedrooms would not change, unless for some reason the “use type” was changed.

4. **Request:** Why are we requiring a special exception or minor special exception for the STR-CWH use when certain additional use regulations are not modifiable?

   **Staff Response:** A SPEX or SPMI is being proposed for the STR-CWH use in order to allow the PC and Board with an opportunity to review the proposal to determine if it is an appropriate use in the proposed location and to have the opportunity to impose conditions of approval in order to address specific impacts. The SPEX and SPMI mirror what is required for the similar Bed and Breakfast Inn use and is required in those zoning districts with smaller lots and more density where the use is more likely to have impacts on its neighbors.
that need to be evaluated and addressed.

5. **Request**: What is the economic benefit of the STR-CWH use versus the protection of the integrity of neighborhoods and the impacts of parking, noise and rental capacity?

   **Visit Loudoun Response**: Visit Loudoun does not have any specific data to answer this question but believes a third-party monitoring system would be useful regarding reporting non-compliant hosts and generating necessary reporting and follow-up.

6. **Request**: Request for more information on how other jurisdictions are regulating the use and the impacts they have seen.

   **Staff Response**: Since the General Assembly passed SB 1578, which does not place any limits on a locality’s ability to regulate STRR uses, several counties have adopted specific regulations further defining STRR uses, distinguishing them from Bed and Breakfasts and other lodging uses, and developing standards for the STRR use.

   The impacts of these regulations are largely mixed. In most cases, STRR providers have argued that they are meeting a market demand that provides local economic benefits and adopting regulations or further regulating STRRs negatively impacts the businesses. Conversely, existing Bed and Breakfast owners or similar providers ask for a level playing field where regulations for their use were significantly more stringent than STRR regulations. Neighbors argue there are increased noise, traffic, and parking issues.

   Staff researched jurisdictions in the Commonwealth with regulations for Short-term rental uses. Below is a compilation of select regulations from Albemarle County, Fairfax County, and Henrico County. Attachment 6 includes a table of select regulations of these jurisdictions.

   **Albemarle County**

   Albemarle County initially adopted regulations for STRR uses in 2019 and have defined the use as a “homestay.” A homestay use is an accessory residential use.

   Owner – Must reside on the subject parcel for a minimum of 180 days in a calendar year unless a special exception is approved allowing a property-managing agent.

   Responsible agent – Must be within 30 miles and 60 minutes of the homestay when guests are present.
Parking – One off-street space per guest room. No option to provide alternative parking.

Number of rooms – Homestays on parcels less than 5 acres may have 2 guest rooms, unless an approved special exception allows up to 5 guest rooms. Homestays on parcels 5 acres or greater may have up to 5 guest rooms. Parcels 5 acres or greater may also have up to two homestay uses per parcel. A single-family dwelling may only have one homestay use per dwelling.

The owner of a homestay on 5 acres or greater may be absent (i.e. unhosted stays) up to 7 days in a month and up to 45 days per calendar year, subject to verification of the owner’s log by the Zoning Administrator.

**Fairfax County**

Fairfax County has established regulations for STRR uses and have defined them as Short-Term Lodging, or STL. An STL use is prohibited in detached accessory structures and dwelling units, including affordable and workforce dwelling units.

Permanent Resident – Must be a resident of the principal dwelling unit, residing on the parcel a minimum of 185 days per calendar year.

Authorized agent – Must be available for issues or emergencies at the STL when guests are present.

Short-Term Lodging Operator – An owner or tenant of a property who offers that property for STL.

Parking – One designated space for lodgers. The Operator has the authority to reserve the space for STL purposes.

Intensity / Number of guests – An STL may operate no more than 60 nights per calendar year. A maximum of 6 adults are permitted on one rental contract, and a dwelling may only have one contract per night.

Fairfax County prohibits events and activities at permitted STL uses.

**Henrico County**

Henrico County has established regulations for STRR uses and have defined them as Short-Term Rentals, renting a home, or a space in a
home, for less than 30 days at a time. They are permitted in one-family residence districts. Henrico differentiates between “hosted” and “unhosted” rentals.

Homeowner or Designated Responsible Party – Must be available to respond to complaints in person at any time during the rental.

Hosted – The rental is in the principal dwelling, has at least 80 feet of frontage on a public street, no more than six renters at any time and the total number of days per year does not exceed 60.

Unhosted – A conditional use permit (legislative action) is required for unhosted stays.

Conditional Use Permit – A conditional use permit is required also if the rental is in a guest house, the rental lot has less than 80 feet of public street frontage, the rental exceeds six renters or if the total number of days per year exceeds 60.

Parking – Not addressed.

Intensity / Number of guests – There may not be more than two persons per bedroom, and all rooms / parties must be booked together (one rental agreement).

Henrico County prohibits events and activities at permitted STR uses.

7. Request: Commissioners commented that there should not be the same regulations for the eastern and western portions of the County.

Staff Response: This concern is the reason that Staff proposes to require most of the STR-CWH uses in the eastern portion of the County to be special exception uses which will enable the Board of Supervisors to review applications to protect smaller lots and neighborhoods. It is very difficult to impose regulations that will address every specific concern or impact in every location. This is why the review of the use on a case-by-case basis is important. Please see response to Question #4 above.

8. Request: Commissioners expressed concern about the impacts the use can have on residential communities, particularly those that do not have an HOA, to include excessive parking and noise.

Staff Response: The proposed parking regulations are similar to those for Bed and Breakfast Inn establishments of two parking spaces for operator/managers and one for each sleeping room or unit. The proposed parking requirement for
the STR-RA use is one parking space for 4 or fewer guests and two parking spaces for 5-8 guests; and for the STR-CWH use two spaces per dwelling unit or one per room used for overnight accommodations, whichever is greater. Staff does not find a reason for STRR parking requirements to be more intense than the requirements for a single-family residential use. Regulating for worse case scenarios don’t always work and can result in over parking the use. Not permitting private parties or events for the use should reduce potential parking and noise impacts.

9. **Request:** What are the potential impacts of including a grandfathering provision?

**Staff Response:** Staff does not recommend a grandfathering provision for the existing STRR uses that have not obtained any zoning permit approval for the use as a B&B. The proposed regulations are intended to address the impacts that the STRR uses may have on existing neighborhoods. Staff recommends that all STRR uses be treated equally and supports a grace period to allow the existing STRR uses reasonable time to come into compliance with the proposed regulations. There is no way of knowing how many existing STRR uses do not meet the proposed regulations, as this would require an inspection of each use. Also, properties are currently not reviewed when registered.

10. **Request:** What is Transient Occupancy Tax? Who pays Transient Occupancy Tax? Verify that the STRR uses will require the collection of the Transient Occupancy Tax?

**Visit Loudoun Response:** Code of Virginia Section 58.1-3819 states: “Any county, by duly adopted ordinance, may levy a transient occupancy tax on hotels, motels, boarding houses, travel campgrounds, and other facilities offering guest rooms rented out for continuous occupancy for fewer than 30 consecutive days. The tax shall be imposed on the total price paid by the customer for the use or possession of the room or space occupied in a retail sale. Such tax shall be in such amount and on such terms as the governing body may, by ordinance, prescribe.”

The transient guest pays the tax to the host who then remits it to Loudoun’s Commissioner of the Revenue. Currently, Transient Occupancy Tax (TOT) is only collected on properties that can accommodate 4 or more people. Visit Loudoun estimates that half of all units in Loudoun may fall below that threshold.

At the October Finance/Government Operations and Economic Development Committee meeting, the Commissioner of the Revenue is bringing forward an item to consider revisions to the Loudoun County Codified Ordinances Chapter 878, containing the County’s provisions for assessment and collection of
Transient Occupancy Tax (TOT). The proposed updates will align the ordinance with recent updates to the Code of Virginia as well as present a proposal supported by Visit Loudoun to lower the occupancy threshold for the collection and remittance of TOT. This would require all offerors of overnight lodging to collect TOT, versus only those that can presently accommodate four or more persons at one time.

Based on a Visit Loudoun commissioned study by Host Compliance of STRRs operating in the county between March 2019 through December 2020, the conservative estimate for increase TOT collection would be approximately $180,000 (Attachment 7). Visit Loudoun supports the allocation of the increased TOT collection to be used to pay for the services of a third-party data collection and/or compliance platform.

11. **Request:** What happens if a use does both a STRR and a rental period of longer than 30 days in the same building?

**Staff Response:** Both short-term rental and a rental period of longer than 30 days would be permitted in the same building. The proposed additional regulations would only apply for the short-term rental. No additional regulations would be applicable during the time that the property is rented for a period of more than 30 days at a time.

**Options:** The Planning Commission could propose a limitation on longer term rentals so that a property owner could not rent the same structure for both short-term and long-term rentals as it would be difficult to administer.

12. **Request:** How will the properties under the 1972 Zoning Ordinance be addressed?

**Staff Response:** The amendments proposed with ZOAM-2018-0001 would not apply to properties that are administered under the 1972 Loudoun County Zoning Ordinance. The Zoning Administrator could opine that the rental of a room or rooms for less than 30 days at a time may be permitted as an accessory use to a residential dwelling and establish parameters to ensure that the use is incidental and subordinate to the principal dwelling, such as limiting the use to no more than 180 days. However, as the 1972 Zoning Ordinance cannot be amended, the STR-CWH use cannot be added to the list of permitted uses for properties administered under the 1972 Zoning Ordinance. It is important to note that properties that are rented for 30 days or more at a time are not short-term rentals and would be permitted for properties administered under the 1972 Zoning Ordinance. The Zoning Administrator is considering an Advisory Opinion regarding how the STRR uses will be administered under the 1972 Zoning Ordinance, which will be completed before the Board public hearing on the ZOAM.
13. **Request:** What do we know about STRR uses? What is the breakdown of Residential Accessory vs. Commercial Whole House in Loudoun County?

**Visit Loudoun Response:** Based on a Visit Loudoun commissioned study by Host Compliance of STRRs operating in the County between March 2019 through December 2020, sixty-one percent of listings were for whole house rental of single-family houses (Attachment 7). Note that the terms used in the study are different than those proposed with ZOAM-2018-001 in that there was no distinction made rentals of the entire home (dwelling unit) that are non-owner-occupied (STR-CWH) and those rentals that happen to be for the entire home (dwelling unit) as an accessory use to a primary residence (STR-RA).

![Entire vs Partial Home Rentals](chart1.png)

- **Entire vs Partial Home Rentals:**
  - Entire Home: 61%
  - Partial Home: 34%
  - Unknown: 4%

![Single vs Multi Family Homes](chart2.png)

- **Single vs Multi Family Homes:**
  - Single Family: 67%
  - Multi Family: 24%
  - Unknown: 9%

Beth Erickson from Visit Loudoun will be in attendance at the Work Session and available to discuss this issue with the Planning Commission.

**Edit to Draft Text Following Public Hearing:** Staff discovered a typographical error in the June 28, 2022, Planning Commission Public Hearing Draft Text, dated June 6, 2022, in which Section 5-669(H) Use of Affordable Dwelling Unit Developments and Unmet Housing Needs Units (UHNUs) Not Permitted, incorrectly referenced Short-Term Rental – Commercial Whole House Rental uses instead of Short-Term Rental – Residential Accessory uses. The draft text has been revised to correctly reference Short-Term Rental – Residential Accessory uses and is dated June 6, 2022, revised through September 1, 2022 (Attachment 1).

**TOPICS FOR DISCUSSION**

Staff continues to identify the following outstanding issues:

1. **Affordable Housing** – As identified within the staff report for the Commission’s June 28, 2022 Public Hearing, the impact on the availability of affordable housing, specifically STR-CWH uses, remains an outstanding issue. In its
referral, the Community Planning Division of the Department of Planning and Zoning stated that the permanent conversion of entire homes into commercial short-term rental uses (STR-CWH) raises concerns related to housing availability, particularly in areas of the County where housing is constrained. Community Planning recommended that the Office of Housing be engaged in the development of Zoning Ordinance language. The Office of Housing provided a referral that discussed the positives and negatives of using accessory units for STRR uses and recommended that STRR requirements not supersede any applicable Affordable Dwelling Unit (ADU) ordinances. The impact of STRR uses on housing affordability was a topic that arose on several occasions during the public outreach portion of the project. The amount of impact the STR-CWH may have on the availability is unknown, but it is reasonable to conclude that if a property owner can make more of an income from offering a dwelling unit or accessory dwelling unit as a STR-CWH rather than offering the dwelling unit as a longer-term rental or putting the dwelling unit on the market, then this likely the option that many owners will consider.

**Staff Recommendation:** Staff supports the draft text in Attachments 1, 2 and 3 that incorporates language that prohibits the use of ADUs and Affordable Housing Units (AHUs) required by Article 7 of the Zoning Ordinance for STRR uses. Short of not permitting the STR-CWH use, there is no clear regulatory approach that will fully address this issue.

2. **Parking** – As mentioned in the updates above, the proposed parking regulations are similar to those for Bed and Breakfast Inn establishments. The proposed STR-RA requires a maximum of 2 parking spaces, and the proposed STR-CWH requires a maximum of 6 spaces (1 per guest room, maximum of 5 guest rooms, and 1 for the Operator and/or Manager).

**Staff Recommendation:** Staff supports the draft text in Attachments 1 and 2 that proposes the aforementioned parking requirements.

3. **Grandfathering** – Speakers at the Public Hearing requested that Grandfathering provisions be included with ZOAM-2018-0001.

**Staff Recommendation:** Staff does not recommend a grandfathering provision for the existing STRR uses that have not obtained any zoning permit approval for the use as a Bed and Breakfast as the proposed regulations are intended to address the impacts that the STRR uses may have on existing neighborhoods. Staff recommends that all STRR uses be treated equally and supports a grace period to allow the existing STRR uses reasonable time to come into compliance with the proposed regulations.
DRAFT MOTIONS

1. I move that the Planning Commission forward ZOAM-2018-0001, included as Attachments 1, 2, and 3 to the September 8, 2022, Planning Commission Work Session Memorandum to the Board of Supervisors with a recommendation of approval.

OR

2. I move an alternate motion.

ATTACHMENTS

1. Short-Term Rental – Residential Accessory Draft Text in Articles 5 and 8
2. Short-Term Rental – Commercial Whole House Draft Text in Articles 5 and 8
3. Draft Text for the Zoning Districts in Article 2, 3 and 4 to add the Short-Term Rental – Commercial Whole House Use
4. Copy Teste and Revised Resolution of Intent to Ament the Revised 1993 Loudoun County Zoning Ordinance regarding Short-Term Residential Rentals, 10/17/2019
5. Department of Housing and Community Development Comments dated August 25, 2022
6. Table of Short-Term Rental Regulations from Sample Jurisdictions
7. Visit Loudoun Short-Term Residential Rental Study, December 2020
8. Comparison of STRR and Other Lodging Uses in Revised 1993 Loudoun County Zoning Ordinance
ARTICLE 5
ADDITIONAL REGULATIONS AND STANDARDS

5-101 Permitted Accessory Uses and Structures.

(A) Residential.

... (21) Short-Term Rental – Residential Accessory, pursuant to Section 5-669.

5-669 Short-Term Rental – Residential Accessory.

(A) Modifications Not Permitted. Notwithstanding Section 5-600, this Section 5-669(A) and Sections 5-669(B), 5-669(C)(2)(b)(i), 5-669(C)(4), 5-669(C)(5), 5-669(C)(7), 5-669(D), 5-669(G), and 5-669(H) below cannot be modified by Minor Special Exception.

(B) Registration. A Short-Term Rental – Residential Accessory use shall be permitted only on a property that is currently registered by the Operator in accordance with Chapter 1470 of the Codified Ordinances of Loudoun County, unless exempt from the registration requirement under Section 1470.03.

(1) An “Operator” must meet the definition of “Operator” under Chapter 1470 of the Codified Ordinances of Loudoun County.

(2) The annual registration required by Chapter 1470 of the Codified Ordinances of Loudoun County must be on display in a conspicuous location inside the main entrance into the Short-Term Rental – Residential Accessory use and included with all advertising materials.

(C) Intensity and Character.

(1) Management Requirements. The Operator, or a Manager designated by the Operator, must be available at all times when the
property is occupied by renters to address issues that arise. During all rental periods, the Operator or Manager must:

(a) Respond by phone or electronic means within 30 minutes and be available to be onsite within 60 minutes.

(b) Provide the contact information of the Operator and/or Manager to guests of the Short-Term Rental – Residential Accessory use in writing prior to the beginning of the rental period. The contact information also must be posted in a conspicuous location within the area being used as the Short-Term Rental – Residential Accessory use.

(2) **Rental Capacity.** The following capacity limits apply to a Short-Term Rental – Residential Accessory use per night:

(a) **Guest Rooms.** The number of rooms used for overnight accommodations for guests must not exceed 4 per parcel.

(b) **Guest Capacity.** The total number of guests permitted per night must not exceed a maximum of 8 guests per parcel. This requirement is not intended to limit the number of guests that may sleep in each room nor the number of dwelling units per parcel used for the Short-Term Rental – Residential Accessory use.

(i) For parcels served by an individual sewage disposal system, the total number of guests permitted per night must not exceed the maximum permitted capacity of the individual sewage disposal system, as approved by the Health Department.

(ii) For any multi-family dwelling unit development or single-family attached dwelling unit development that contains multiple principal dwelling units on a single parcel or lot, the total number of guests permitted per night must not exceed a maximum of 4 guests per dwelling unit, provided all of the requirements of this section can be met.

(3) **Rental Period.** A dwelling unit, or portion thereof, shall only be used as a Short-Term Rental – Residential Accessory use for a maximum of 180 days per calendar year.
(4) **Food Service Not Permitted.** The Operator or Manager must not prepare, serve, or contract for the catering of food, or alcoholic beverages for consumption by any guests of the Short-Term Rental – Residential Accessory use. The Short-Term Rental – Residential Accessory use must not contain restaurant facilities.

(5) **Private Parties and/or Temporary Special Events Not Permitted.** Private parties and/or Special Events pursuant to Section 5-500(C) are not permitted in association with the Short-Term Rental – Residential Accessory use.

(6) **Dwelling Unit Types Permitted.** A Short-Term Rental – Residential Accessory use is permitted to operate only in a principal dwelling unit and/or in an accessory dwelling unit approved pursuant to Section 5-613.

(7) **Residency Requirement.** The Operator must be a permanent resident of the parcel that contains the Short-Term Rental – Residential Accessory use. For the purposes of this section, a permanent resident is a person who occupies a dwelling unit for a minimum of 185 days out of the calendar year.

(D) **Zoning Permit Requirements.** A Zoning Permit is required for all Short-Term Rental – Residential Accessory uses.

(1) In addition to the requirements of Section 6-1000, the Zoning Permit application must include authorization for the Zoning Administrator to conduct an inspection prior to approval of the Zoning Permit to verify compliance with all applicable Zoning Ordinance requirements as well as the following:

(a) Written consent from the property owner.

(b) The name and contact information of the Operator and/or Manager.

(c) The type of dwelling unit(s) that will be rented.

(d) The address of the dwelling unit(s) that will be rented.

(e) The maximum rental capacity.
(f) The type of water and sewer service for the proposed use.

(g) Any required building code approval(s) from the Department of Building and Development, fire code approval(s) from the Fire Marshal, and Health Department approval.

(h) A drawing that shows the location of the dwelling unit(s) being rented and the required parking on the parcel that is subject to the Zoning Permit application.

(2) The approved Zoning Permit for the Short-Term Rental – Residential Accessory use must be displayed in a conspicuous location upon entry into the Short-Term Rental- Residential Accessory use and included with all advertising materials.

(3) The Zoning Permit for a Short-Term Rental – Residential Accessory use is valid for only the original Operator and dwelling unit(s) listed on the Zoning Permit application and is not transferable to any future Operator or other property. Changes to the information pertaining to the Operator or dwelling unit(s) listed on the Zoning Permit will require the approval of a new Zoning Permit.

(4) No more than one Zoning Permit for a Short-Term Rental – Residential Accessory use shall be permitted per parcel.

(5) A Zoning Permit for a Short-Term Rental – Residential Accessory use is not permitted on a parcel that is subject to an approved zoning permit for a Bed and Breakfast Homestay use, Bed and Breakfast Inn use, Country Inn use, Rural Retreats and Resorts use, Campground Use, or Short-Term Rental – Commercial Whole House use.

(6) The County approval of a Short-Term Residential Accessory use through the issuance of a Zoning Permit is not intended to abrogate, annul, or otherwise interfere with any easement, covenant or other private agreement or legal relationship, such as those of a Homeowners’ Association or Condominium Owners’ Association. However, where the regulations of this Ordinance are more restrictive or impose higher standards or requirements than such easements, covenants or other private agreements or legal relationships, the regulations of this Ordinance must govern.
Simultaneous Rental Contracts Not Permitted. All guests staying within the same dwelling unit during a rental period for a Short-Term Rental – Residential Accessory use must be covered under the same rental agreement.

Parking Requirements.

(1) In addition to the off-street parking spaces required for the existing dwelling unit(s) and any other uses on the parcel pursuant to Section 5-1100, the following parking requirements apply:

(a) For a rental capacity of 4 guests or fewer, one (1) off-street parking space must be provided.

(b) For a rental capacity of 5 to 8 guests, two (2) off-street parking spaces must be provided.

(2) The Zoning Administrator may modify the parking requirements of this Section if the Operator can demonstrate that the requirements of this Section cannot be met because of (a) the exceptional size and/or shape of the lot; (b) environmental or engineering constraints on the lot; (c) special accessibility needs; or (d) other extraordinary situations or conditions of the lot. The Zoning Administrator may attach conditions to any modification to ensure that the results of the modification will be in accordance with the purpose and intent of this Section.

(3) On-street parking may not count towards the required parking unless specifically requested and approved pursuant to Section 5-669(F)(2).

Safety Requirements. Dwelling units used for the Short-Term Rental – Residential Accessory use must meet the following requirements:

(1) Each room used for overnight accommodations and floor must have an operational smoke detector that is interconnected with the smoke detectors in the rest of the structure.

(2) Each floor must have at least one operational fire extinguisher in a conspicuous location that is clearly marked and accessible to guests.
(3) Each floor must have at least one operational carbon monoxide detector.

(4) All rooms that may be used for overnight accommodations must have at least two means of egress, as defined by the Building Code.

(5) A fire safety plan and emergency contact information, including the contact information for the Operator or Manager, local law enforcement, and fire and rescue, must be posted in a conspicuous location.

(H) **Use of Affordable Dwelling Unit Developments and Unmet Housing Needs Units (UHNUs) Not Permitted.** All units provided in accordance with Article 7 of this Ordinance and UHNUs provided in accordance with proffered conditions cannot be used for Short-Term Rental – Commercial Whole House Rental Residential Accessory uses.

ARTICLE 8
DEFINITIONS

**Short-Term Rental – Residential Accessory:** The renting of a portion or the entirety of a dwelling unit as an accessory use to a principal dwelling unit that is the primary residence of the Operator, for a period of fewer than 30 consecutive days, and no more than 180 days per calendar year, in exchange for a charge for the occupancy or other considerations.
SHORT-TERM RENTAL – COMMERCIAL WHOLE-HOUSE
PROPOSED AMENDMENTS TO ARTICLES 5 AND 8

ARTICLE 5
ADDITIONAL REGULATIONS AND STANDARDS

5-670 Short-Term Rental – Commercial Whole-House

(A) Modifications Not Permitted. Notwithstanding Section 5-600, this Section 5-670(A) and Sections 5-670(B), 5-670(C)(2)(b)(i), 5-670(C)(4), 5-670(C)(5), 5-670(D), 5-670(I), and 5-670(K) cannot be modified by Minor Special Exception.

(B) Registration. A Short-Term Rental – Commercial Whole-House use shall be permitted only on a property that is currently registered by the Operator in accordance with Chapter 1470 of the Codified Ordinances of Loudoun County, unless exempt from the registration requirement under Section 1470.03.

(1) An “Operator” must meet the definition of “Operator” found in Chapter 1470 of the Codified Ordinances of Loudoun County.

(2) The annual registration required by Chapter 1470 of the Codified Ordinances of Loudoun County must be on display in a conspicuous location inside the main entrance into the Short-Term Rental – Commercial Whole-House use and included with all advertising materials.

(C) Intensity and Character.

(1) Management Requirements. The Operator, or a Manager designated by the Operator, must be available during all times when the property is occupied by renters to address issues that arise. During all rental periods, the Operator or Manager must:

(a) Respond by phone or electronic means within 30 minutes and be available to be onsite within 60 minutes.

Attachment 2
(b) Provide the contact information for the Operator and/or Manager to guests of the Short-Term Rental – Commercial Whole House use in writing prior to the beginning of the rental period. The contact information also must be posted in a conspicuous location within the Short-Term Rental – Commercial Whole House use.

(2) **Rental Capacity.** The following capacity limits apply to a Short-Term Rental – Commercial Whole-House use per night:

(a) **Guest Rooms.** The number of rooms used for overnight accommodations for guests must not exceed 5 per parcel.

(b) **Guest Capacity.** The total number of guests permitted per night must not exceed a maximum of 10 guests per parcel. This requirement is not intended to limit the number of guests that may sleep in each room nor the number of dwelling units per parcel used for the Short-Term Rental – Commercial Whole House use.

(i) For parcels served by an individual sewage disposal system, the total number of guests permitted per night must not exceed the maximum permitted capacity of the individual sewage disposal system, as approved by the Health Department.

(3) **Lot Area.** The minimum lot area for a Short-Term Rental – Commercial Whole-House use with a total guest capacity of greater than 6 guests per night is 5 acres.

(4) **Food Service Not Permitted.** The Operator or Manager must not prepare, serve, or contract for the catering of food or alcoholic beverages for consumption by any guests of the Short-Term Rental – Commercial Whole-House use. The Short-Term Rental – Commercial Whole-House use must not contain restaurant facilities.

(5) **Private Parties and/or Temporary Special Events Not Permitted.** Private parties and/or Special events pursuant to Section
5-500(C) are not permitted in association with the Short-Term Rental – Commercial Whole-House use.

(6) **Dwelling Unit Types Permitted.** A Short-Term Rental – Commercial Whole-House use is permitted to operate only in a non-owner-occupied single family detached dwelling unit and/or in a non-owner-occupied accessory dwelling unit approved pursuant to Section 5-613 that is accessory to a principal single family detached dwelling unit.

(7) **Yard Standards.** All structures used for STR-CWH must be set back a minimum of 15’ from all lot lines or the minimum yard requirements of the applicable zoning district, whichever is greater. The minimum yard requirements of the applicable zoning district cannot be modified by minor special exception.

(D) **Zoning Permit Requirements.** A Zoning Permit is required for all Short-Term Rental – Commercial Whole-House uses.

(1) In addition to the requirements of Section 6-1000, the Zoning Permit application must include authorization for the Zoning Administrator to conduct an inspection prior to approval of the Zoning Permit to verify compliance with all applicable Zoning Ordinance requirements as well as the following:

(a) Written consent from the property owner,

(b) The name and contact information of the Operator and/or Manager,

(c) The type of dwelling unit(s) that will be rented,

(d) The address of the dwelling unit(s) that will be rented,

(e) The maximum rental capacity,

(f) The type of water and sewer service for the proposed use,

(g) Any required building code approval(s) from the Department of Building and Development, fire code
approval(s) from the Fire Marshal, and Health Department approval.

(h) A drawing that shows the location of the dwelling unit(s) being rented and the required parking on the parcel that is subject to the Zoning Permit application.

(2) The approved Zoning Permit for the Short-Term Rental – Commercial Whole-House use must be displayed in a conspicuous location upon entry into the Short-Term Rental – Commercial Whole-House use and included with all advertising materials.

(3) The Zoning Permit for a Short-Term Rental – Commercial Whole-House use is valid for only the original Operator and dwelling unit(s) listed on the Zoning Permit application and is not transferable to any future Operator or other property. Changes to the information pertaining to the Operator or dwelling unit(s) listed on the Zoning Permit will require the approval of a new Zoning Permit.

(4) No more than one Zoning Permit for a Short-Term Rental – Commercial Whole-House use shall be permitted per parcel.

(5) A Zoning Permit for a Short-Term Rental – Commercial Whole-House use is not permitted on a parcel that is subject to an approved Zoning Permit for a Bed and Breakfast Homestay use, Bed and Breakfast Inn use, Country Inn use, Rural Retreats and Resorts use, Campground Use, or for a Short-Term Rental – Residential Accessory use.

(6) The County approval of a Short-Term Rental – Commercial Whole House use through the issuance of a Zoning Permit is not intended to abrogate, annul, or otherwise interfere with any easement, covenant or other private agreement or legal relationship, such as those of a Homeowners’ Association or Condominium Owners’ Association. However, where the regulations of this Ordinance are more restrictive or impose higher standards or requirements than such easements, covenants or other private agreements or legal relationships, the regulations of this Ordinance must govern.

(E) Simultaneous Rental Contracts Not Permitted. All guests staying within the same dwelling unit during a rental period for a Short-Term Rental –
Commercial Whole-House use must be covered under the same rental agreement.

(F) Parking Requirement. The required off-street parking spaces for a Short-Term Rental – Commercial Whole-House Rental use are 2 per dwelling unit or 1 per room used for overnight accommodations for guests, whichever is greater. In addition, 1 parking space must be provided for the Operator and/or Manager. On-street parking does not count towards required parking.

(G) Exterior Lighting. Exterior lighting for a Short-Term Rental – Commercial Whole-House use is subject to Sections 5-652(A)(2), and 5-652(A)(3). The maximum height of pole-mounted exterior lighting for a Short-Term Rental – Commercial Whole-House use is 12 feet.

(H) Roads/Access. For any Short-Term Rental – Commercial Whole-House use that is located on a parcel which does not have frontage on a Class I or Class II road, documentation shall be provided to the Zoning Administrator, at the time of Zoning Permit application, demonstrating that the private access easement serving such lot may be used to provide access to the Short-Term Rental – Commercial Whole-House use.

(I) Safety Requirements. Dwelling units used for the Short-Term Rental – Commercial Whole-House use must meet the following requirements:

(1) Each room used for overnight accommodations and floor must have an operational smoke detector that is interconnected with the smoke detectors in the rest of the structure.

(2) Each floor must have at least one operational fire extinguisher in a conspicuous location that is clearly marked and accessible to guests.

(3) Each floor must have at least one operational carbon monoxide detector.

(4) All rooms that may be used for overnight accommodations must have at least two means of egress, as defined by the Building Code.

(5) A fire safety plan and emergency contact information, including the contact information for the Operator or Manager, local law enforcement
enforcement, and fire and rescue, must be posted in a conspicuous location.

(J) A structure existing prior to January 7, 2003, located within an Historic Site District or Historic and Cultural Conservation District may be used as a Short-Term Rental – Commercial Whole-House and shall be exempt from the minimum lot area requirements specific above, provided that any expansion or enlargement of such structure shall not exceed 15% of the total floor area existing prior to January 7, 2003, unless a greater expansion is approved by Minor Special Exception, pursuant to Section 6-1300.

(K) Use of Affordable Dwelling Unit Developments and Unmet Housing Needs Units (UHNUs) Not Permitted. All units provided in accordance with Article 7 of this Ordinance and UHNUs provided in accordance with proffered conditions cannot be used for Short-Term Rental – Commercial Whole House Rental uses.

ARTICLE 8
DEFINITIONS

Short-Term Rental – Commercial Whole House: The renting of a non-owner-occupied single family detached dwelling unit or a non-owner-occupied accessory dwelling unit that is accessory to a principal single family detached dwelling unit in which the entire dwelling unit is used for providing overnight accommodations for a period of fewer than 30 consecutive days in exchange for a charge for the occupancy or other considerations.
PROPOSED AMENDMENTS TO ARTICLES 2, 3, 4

Amendments to Article 2, Non-Suburban District Regulations:
Add “Short-Term Rental – Commercial Whole House” as a Permitted use in the following districts:
  o AR-1 (Agricultural Rural – 1) (Section 2-100), pursuant to Section 5-670
  o AR-2 (Agricultural Rural – 2) (Section 2-200), pursuant to Section 5-670
  o A-10 (Agriculture) (Section 2-300), pursuant to Section 5-670
  o A-3 (Agricultural Residential) (Section 2-400), pursuant to Section 5-670
  o RC (Rural Commercial) (Section 2-900), pursuant to Section 5-670
  o JLMA-20 (Joint Land Management Area – 20) (Section 2-1300), pursuant to Section 5-670
  o TR-10 (Transitional Residential – 10) (Section 2-1400), pursuant to Section 5-670
  o TR-3 (Transitional Residential – 3) (Section 2-1500), pursuant to Section 5-670
Add “Short-Term Rental – Commercial Whole House” as a Minor Special Exception use in the following zoning districts:
  o CR-1 (Countryside Residential – 1) (Section 2-500), pursuant to Section 5-670
  o CR-2 (Countryside Residential – 2) (Section 2-600), pursuant to Section 5-670
  o CR-3 (Countryside Residential – 3) (Section 2-700), pursuant to Section 5-670
  o CR-4 (Countryside Residential – 4) (Section 2-800), pursuant to Section 5-670
  o JLMA-1 (Joint Land Management Area – 1) (Section 2-1000), pursuant to Section 5-670
  o JLMA-2 (Joint Land Management Area – 2) (Section 2-1100), pursuant to Section 5-670
  o JLMA-3 (Joint Land Management Area – 3) (Section 2-1200), pursuant to Section 5-670
  o TR-2 (Transitional Residential – 2) (Section 2-1600), pursuant to Section 5-670
  o TR-1 (Transitional Residential – 1) (Section 2-1700), pursuant to Section 5-670

Amendments to Article 3, Suburban District Regulations:
Add “Short-Term Rental – Commercial Whole House” as a Minor Special Exception use in the following zoning districts:
  o R-1 (Single Family Residential) (Section 3-100), pursuant to Section 5-670
  o R-2 (Single Family Residential) (Section 3-200), pursuant to Section 5-670
Add “Short-Term Rental – Commercial Whole House” as a Special Exception use in the following zoning districts:
  o R-3 (Single Family Residential) (Section 3-300), pursuant to Section 5-670
  o R-4 (Single Family Residential) (Section 3-400), pursuant to Section 5-670
  o R-8 (Single Family Residential) (Section 3-500), pursuant to Section 5-670

Amendments to Article 4, Special & Overlay Districts:
Add “Short-Term Rental – Commercial Whole House” as a Permitted use in the following zoning district:
  o PD-RV (Planned Development–Rural Village) (Section 4-1200), pursuant to Section 5-670
Add “Short-Term Rental – Commercial Whole House” as a Minor Special Exception use in the following zoning district:
  o PD-CV (Planned Development–Countryside Village) (Section 4-900), pursuant to Section 5-670
Add “Short-Term Rental – Commercial Whole House” as a Special Exception use in the following zoning districts:
  o PD-TC (Planned Development–Town Center) (Section 4-800), pursuant to Section 5-670
  o PD-MUB (Planned Development – Mixed Use Business District) (Section 4-1350), pursuant to Section 5-670
At a business meeting of the Board of Supervisors of Loudoun County, Virginia, held in the County Government Center, Board of Supervisors' Meeting Room, 1 Harrison St., S.E., Leesburg, Virginia, on Thursday October 17, 2019 at 5:00 p.m.

IN RE: Revised Resolution of Intent to Amend the Revised 1993 Loudoun County Zoning Ordinance: Short-term Residential Rentals (Countywide):

Vice Chairman Buona moved that the Board of Supervisors adopt the revised Resolution of Intent to Amend the Revised 1993 Loudoun County Zoning Ordinance as provided in Attachment 1 of the October 17, 2019, Board of Supervisors Business Meeting Action Item.

Seconded by Supervisor Volpe.

Voting on the Motion: Supervisors Buffington, Buona, Higgins, Letourneau, Meyer, Randall, Saines, Umstattd, and Volpe – Yes; None-No.

COPY TESTE:

[Signature]
DEPUTY CLERK FOR THE LOUDOUN COUNTY BOARD OF SUPERVISORS

Item 6 Revised Resolution of Intent to Amend the Revised 1993 Loudoun County Zoning Ordinance: Short-term Residential Rentals
BOARD OF SUPERVISORS OF LOUDOUN COUNTY

RESOLUTION OF INTENT TO AMEND THE REVISED 1993 LOUDOUN COUNTY ZONING ORDINANCE TO ESTABLISH SHORT-TERM RESIDENTIAL RENTALS AS A NEW ACCESSORY USE TO RESIDENTIAL USES, ESTABLISH COMMERCIAL WHOLE-HOUSE SHORT-TERM RENTALS AS A NEW PRINCIPAL USE TYPE IN ZONING DISTRICTS PERMITTING RESIDENTIAL USES, AND ESTABLISH NEW AND/OR REVISE EXISTING ADDITIONAL USE REGULATIONS, PERFORMANCE STANDARDS, AND DEFINITIONS TO ADDRESS SHORT-TERM RESIDENTIAL RENTALS AND COMMERCIAL WHOLE-HOUSE SHORT-TERM RENTALS

October 17, 2019

WHEREAS, the Board of Supervisors (the “Board”) wishes to initiate amendments to the Revised 1993 Loudoun County Zoning Ordinance (the “Zoning Ordinance”) in furtherance of the purposes of zoning set out in § 15.2-2283 of the Code of Virginia and to further implement the comprehensive plan; and

WHEREAS, §15.2-983 of the Code of Virginia authorizes localities to adopt an ordinance to establish a short-term residential rental registry requiring the registration of operators offering short term rentals of rooms in residential property within the locality; and

WHEREAS, §15.2-983 of the Code of Virginia does not prohibit, limit, or otherwise supersede existing local authority to regulate the short-term rental of property through general land use and zoning authority; and

WHEREAS, the Board adopted an ordinance to establish a new chapter of the Codified Ordinances of Loudoun County, Short-term Residential Rental Registration on May 1, 2018, which became effective July 1, 2018; and

WHEREAS, public outreach concerning regulation of short-term residential rentals identified commercial whole-house rentals as a form of short-term rental of residential property that is being offered currently in both rural and suburban areas of the County; and

WHEREAS, the short-term rental of residential property, to include commercial whole-house short-term rentals, currently is not permitted in any zoning district under the Zoning Ordinance; and

WHEREAS, the County wishes to promote the health, safety and general welfare of the public by ensuring that short-term residential rentals are required to meet certain criteria to protect both the operators and renters of short-term residential rentals and commercial whole-house short-term rentals; and

WHEREAS, at the December 4, 2018 Business Meeting, the Board of Supervisors voted to adopt the 2019 ZOAM Work Program which included amendments to the Zoning Ordinance in regard to short term residential rentals.

Attachment 1
NOW, THEREFORE, BE IT RESOLVED, that the Board of Supervisors states its intention to amend the Revised 1993 Loudoun County Zoning Ordinance as follows:

- Amend Section 1-200 et seq., Interpretation of Ordinance, to establish new, and clarify, revise, and/or delete existing, regulations as necessary to establish “Short-term Residential Rental” as a new accessory use to residential uses and “Commercial Whole-house Short-term Rental” as a new principal use type, which may be subject to appropriate Additional Regulations, in zoning districts that permit residential uses.

- Amend Article 2, Non-Suburban District Regulations, Article 3, Suburban District Regulations, and Article 4, Special & Overlay Districts, as necessary to establish “Commercial Whole-house Short-term Rental” as a new Permitted, Minor Special Exception, or Special Exception use type, which may be subject to appropriate Additional Regulations, in every zoning district that permits residential uses.

- Amend Section 5-100 et seq., Permitted Accessory Uses and Structures, to establish new, and clarify, revise, and/or delete existing regulations as necessary to establish “Short-term Residential Rental” as a new accessory use to residential uses.

- Amend Section 5-600 et seq., Additional Regulations for Specific Uses, of the Zoning Ordinance to establish new, and clarify, revise, and/or delete existing, regulations as necessary, to mitigate and/or otherwise address the impacts of the new “Short-term Residential Rental” accessory use and the new “Commercial Whole-house Short-term Rental” principal use type.

- Amend Article 8, Definitions, of the Zoning Ordinance to establish new, and clarify, revise, and/or delete existing definitions, as necessary, to establish new definitions for the new “Short-term Residential Rental” accessory use and the new “Commercial Whole-house Short-term Rental” principal use type.

- Amend such other Articles, Sections, Subsections, and provisions of the Zoning Ordinance as necessary to implement and maintain consistency with the foregoing amendments or as otherwise necessary to correct typographical errors, section and subsection numbering, and formatting within, update cross-references to, and further clarify the requirements of, the above-mentioned Articles, Sections, Subsections, and provisions of the Zoning Ordinance.

BE IT FURTHER RESOLVED, that (1) these amendments are in the furtherance of the public necessity, convenience, general welfare, and good zoning practice; (2) these amendments are in furtherance of the orderly subdivision of land and its development; (3) Staff is directed to prepare draft amendment for consideration; and (4) the proposed amendment on these matters be brought forward for notice, hearing, Planning Commission recommendation, and Board of Supervisors’ action.
Michelle – Please see below some comments regarding the proposed language:

1. **“Use of Affordable Dwelling Unit Developments and Unmet Housing Needs Units (UHNUs) Not Permitted.”** All units provided in accordance with Article 7 of this Ordinance and UHNUs provided in accordance with proffered conditions cannot be used for Short-Term Rental – Commercial Whole House Rental uses.” DHCD would support this since this was an area of concern in our original referral. One comment – units with any kind of restriction to 0-100% AMI should be considered “affordable” and not eligible. We want to ensure that, regardless of the term, affordable units would not be allowed. Ie would proffered “workforce units” be exempt because they weren’t proffered as “UHNUs”?

2. DHCD continues to have concerns about short-term rental impacts on affordable housing, notably:
   a. Short term commercial rentals could reduce the inventory of more affordably priced homes.
   b. These short-term rentals could eliminate the availability of much-needed, smaller options in Loudoun County.
   c. These short-term rentals could take rental units and whole-house sales out of the affordable market and remove opportunities for Loudoun residents/workers instead of helping tourists from other counties, states, regions, etc.
   d. These short-term rentals could impact rural / farm workers who need affordable housing west of Rt. 15.
   e. Accessory units, as approved in the Housing Affordability ZOAM (ZOAM-2017-0001), have the potential of integrating affordability in areas of the County where affordable housing is desperately needed and in areas exempt from providing ADUs. Would accessory units used as short-term rental units undermine the use of accessory units as affordable options to County residents? Accessory units could be used in the following manners: by millennials that currently cannot afford the first-time purchase of a home in the County; by older adults and older family members needing to live near relatives.
   f. What if HOA/Condo Associations prohibit short-term rentals? As Loudoun is such
an HOA/Condo heavy county, how realistic is this that short-term rentals will be realized?

   a. It found that “The presence of Airbnb units caused a larger reduction in rental supply, especially among affordable units, which harmed local renters. But Airbnb units also created a larger market expansion effect for affordable housing, which benefited local hosts who owned affordable units and may have been less economically advantaged.”
   b. “After assessing the most commonly used regulations, the study’s authors suggest that imposing a linear tax on Airbnb landlords is more desirable than limiting the number of days a property can be listed. In particular, they propose a new convex tax that imposes a higher tax on expensive units while leaving less expensive units less taxed. The new tax could reduce switching while maintaining market expansion, as well as alleviate social inequality.”

Please let me know should you have any questions.

Brian
## Short-Term Residential Rental Regulations from Sample Jurisdictions

<table>
<thead>
<tr>
<th>Type of Use</th>
<th>PROPOSED STR-RA</th>
<th>PROPOSED STR-CWH</th>
<th>ALBEMARLE COUNTY</th>
<th>FAIRFAX COUNTY</th>
<th>HENRICO COUNTY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principal dwelling unit or accessory dwelling. Rent individual rooms or entire dwelling.</td>
<td>Rental of non-owner-occupied single family detached dwelling and/or non-owner-occupied accessory dwelling.</td>
<td>Homestay - Accessory Residential Use</td>
<td>Short-Term Lodging (STL). Prohibited in detached accessory structures and dwelling units (including affordable and workforce dwelling units).</td>
<td>Short-Term Rentals - accessory use of renting a home or a space in a home for less than 30 days at a time. Permitted in one-family residence districts. Rental in principal dwelling (Conditional Use Permit for guest house). Unhosted stays require Conditional Use Permit.</td>
<td></td>
</tr>
<tr>
<td>Owner</td>
<td>Must reside on the parcel for a minimum of 185 days.</td>
<td>No residency requirement for owner.</td>
<td>Must reside on the parcel for a minimum of 180 days in a calendar year unless special exception approved for property-managing agent.</td>
<td>Must be a resident of the principal dwelling unit; reside on the parcel for a minimum of 185 days.</td>
<td>Rental is in principal dwelling. Owner must occupy the dwelling for at least 185 days per year.</td>
</tr>
<tr>
<td>Responsible/Authorized Agent</td>
<td>Must be available at all times when the property is occupied by renters and respond with 30 minutes; on site within 60 minutes.</td>
<td>Must be available at all times when the property is occupied by renters and respond with 30 minutes; on site within 60 minutes.</td>
<td>Must be within 30 miles and 60 minutes of the Homestay when guests are present.</td>
<td>Must be available for issues or emergencies at the STL when guests are present.</td>
<td>Must be available to respond to complaints in person at any time during the rental.</td>
</tr>
<tr>
<td>Parking</td>
<td>4 guests or fewer, 1 parking space; 8 guests, 2 parking spaces.</td>
<td>2 per dwelling unit or 1 per room occupied by guest, whichever is greater. In addition, one for Operator and/or Manager.</td>
<td>One off-street space per guest room. No option for alternative parking.</td>
<td>One space for lodgers. Operator can reserve space for STL purposes.</td>
<td>One off-street parking space per each guestroom in addition to parking spaces required for the principal dwelling.</td>
</tr>
<tr>
<td>Number of Guest Rooms/Guests</td>
<td>Maximum 4 guest rooms, 8 guests. Multifamily or Single Family Attached Dwelling: maximum 4 guests.</td>
<td>Maximum 5 guest rooms, 10 guests. Minimum of 5 acres for more than 6 guests.</td>
<td>Less than 5 acres: 2 guest rooms (special exception up to 5 guest rooms); 5 acres or greater: up to 5 guest rooms; and may have up to two homestay uses per parcel. Only one homestay per dwelling.</td>
<td>6 adults maximum on one rental contract; one contract per night.</td>
<td>6 renters; no more than 2 persons per bedroom. One rental agreement.</td>
</tr>
<tr>
<td>Number of Rental Days Per Year</td>
<td>180 days</td>
<td>unlimited</td>
<td>Hosted - No maximum days/calendar year. Unhosted Stays - on greater than 5 acres: 7 days/month; 45 days per calendar year.</td>
<td>Unhosted - 60 nights per calendar year.</td>
<td>Hosted - 60 days/year; Conditional Use Permit for more than 60 days/year.</td>
</tr>
<tr>
<td>Events</td>
<td>Private Parties and/or Temporary Special Events Not Permitted</td>
<td>Private Parties and/or Temporary Special Events Not Permitted</td>
<td>Special events serving attendees other than homestay guests are prohibited.</td>
<td>Events and activities prohibited.</td>
<td>Events and activities prohibited.</td>
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<tr>
<td>Affordable Housing</td>
<td>Not permitted in Affordable Dwelling Units or Unmet Housing Needs Units.</td>
<td>Not permitted in Affordable Dwelling Units or Unmet Housing Needs Units.</td>
<td>STR prohibited in affordable and workforce housing.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Attachment 6
Visit LOUDOUN
DC’s Wine Country®

Short-term Residential Rental Study
December 2020
**Background**

**Visit Loudoun contracted with short-term residential rental (STRR) data provider Host Compliance in late 2018 and received data from March 2019 through December 2020.**

- **Host Compliance** scrapes dozens of short-term rental websites including Airbnb, VRBO, HomeAway, TripAdvisor, and Booking to aggregate a database of listings in Loudoun County. They then match up these listings with publicly available tax assessor data to compile a database of unique rental units.

- It should be noted that Host Compliance tracks the *supply* of short-term rentals in Loudoun but is not able to track demand or actual stay information. The data provided is what is available on the listings.

- Unless otherwise noted, all data in this report is from Host Compliance and is from December 2020.

- A glossary is provided on slide 13.
Listing Websites

Most Loudoun County listings are on Airbnb (78%).
- The next largest platforms in Loudoun are VRBO (7%) and HomeAway (6%)
- Globally, the biggest short-term rental companies are Airbnb, Booking Holdings, and Expedia Group (incl. VRBO & HomeAway)
  - Source: Skift Research
Rental Unit Inventory

The total number of rental units has remained stable over the last 22 months.

• There have been fluctuations month to month
  – A low of 421 units in September 2020 to a high of 518 units in March 2020
• Since the pandemic started, units have slightly declined, though not significantly less than 2019.
Most listings are for entire home rentals (61%) in single family homes (67%).
• These percentages have not changed significantly since March 2019.
Home Capacities

About half of units sleep 3 or less people and the majority (58%) are one bedroom.

- 49% sleep 1-3 people
  - The largest percentage of units sleep 2 people (30%)
- 44% sleep 4+ people
- 7% have unknown capacities
Locations within the County

Loudoun’s rentals are spread out throughout the county and the vast majority (90%) are in unincorporated Loudoun County.

- 22% of units have unidentified zip codes

<table>
<thead>
<tr>
<th>Jurisdiction</th>
<th>Number of Units</th>
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</thead>
<tbody>
<tr>
<td>Unincorporated Loudoun County</td>
<td>397</td>
</tr>
<tr>
<td>Leesburg</td>
<td>28</td>
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<tr>
<td>Purcellville</td>
<td>6</td>
</tr>
<tr>
<td>Hamilton</td>
<td>3</td>
</tr>
<tr>
<td>Hillsboro</td>
<td>2</td>
</tr>
<tr>
<td>Lovettsville</td>
<td>1</td>
</tr>
<tr>
<td>Middleburg</td>
<td>1</td>
</tr>
<tr>
<td>Round Hill</td>
<td>1</td>
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<tr>
<td>Sterling – 20164, 20165, 20166</td>
<td>69</td>
</tr>
<tr>
<td>Leesburg – 20175, 20176</td>
<td>40</td>
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<td>Ashburn – 20147, 20148</td>
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<td>Purcellville – 20132</td>
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<td>Middleburg – 20117</td>
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<tr>
<td>Chantilly – 20152</td>
<td>20</td>
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<td>Bluemont – 20135</td>
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<td>Lovettsville – 20180</td>
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<td>Hamilton – 20158</td>
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<td>Round Hill – 20141</td>
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<td>Aldie – 20105</td>
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<td>Waterford – 20197</td>
<td>9</td>
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<tr>
<td>Paeonian Springs – 20129</td>
<td>5</td>
</tr>
<tr>
<td>Other or Unidentified*</td>
<td>88</td>
</tr>
</tbody>
</table>

Link to Zip Code map
Rates

The average daily advertised rate is $172.34 but it varies significantly. The median rate is much lower at $99.00.

- The lowest rate was $21.00 and the highest is $4,000.00 per rental unit.
- It should be noted that these are only the rates scraped from the listings; it is unknown whether a guest actually booked and paid these rates.
- For reference, hotel ADR in 2019 was $125.74 (Source: STR)

<table>
<thead>
<tr>
<th>Number of Bedrooms</th>
<th>Avg. Nightly Rate</th>
<th>Median of Nightly Rate</th>
<th>Min of Nightly Rate</th>
<th>Max of Nightly Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$ 89.64</td>
<td>$ 65.00</td>
<td>$ 21.00</td>
<td>$ 550.00</td>
</tr>
<tr>
<td>2</td>
<td>$ 165.10</td>
<td>$ 147.50</td>
<td>$ 36.00</td>
<td>$ 495.00</td>
</tr>
<tr>
<td>3</td>
<td>$ 255.38</td>
<td>$ 207.50</td>
<td>$ 29.00</td>
<td>$ 990.00</td>
</tr>
<tr>
<td>4</td>
<td>$ 316.57</td>
<td>$ 222.50</td>
<td>$ 50.00</td>
<td>$ 1,500.00</td>
</tr>
<tr>
<td>5</td>
<td>$ 738.06</td>
<td>$ 400.00</td>
<td>$ 100.00</td>
<td>$ 4,000.00</td>
</tr>
<tr>
<td>6</td>
<td>$ 563.00</td>
<td>$ 374.00</td>
<td>$ 250.00</td>
<td>$ 950.00</td>
</tr>
<tr>
<td>7+/Unknown</td>
<td>$ 361.83</td>
<td>$ 85.00</td>
<td>$ 28.00</td>
<td>$ 3,000.00</td>
</tr>
<tr>
<td>Total</td>
<td>$ 172.34</td>
<td>$ 99.00</td>
<td>$ 21.00</td>
<td>$ 4,000.00</td>
</tr>
</tbody>
</table>
**Occupancy**

STRR occupancy is generally much lower than hotel occupancy.

- There are some rental units that are frequently rented and others that are rarely, if ever, rented.
  - 36% of units have had a documented stay within the last 30 days.
  - 46% of units have **not** had a stay within the last 6 months.
  - This is not entirely pandemic related. Back in March 2019, the percentages were very similar:
    - 32% of units had a documented stay within the last 30 days and 39% had not had a stay within the last 6 months.
- Visit Loudoun purchased quarterly Airbnb data through Kalibri Labs & AirDNA in 2018 and part of 2019.
  - Average occupancy rate for hotels in 2018 & 2019 was around 68%.
  - Average occupancy rate for Airbnb units in 2018 & 2019 was 27%.
  - This Airbnb data includes only “hotel comparable” rentals.

![Hotel vs Airbnb Occupancy Rates](chart)

![Last Documented Stay as of Dec 2020](chart2)
**Estimated Revenue**

Annual revenue for the short-term rental industry is estimated to be between $4.61 and $7.59 million.

- According to data from Kalibri Labs & AirDNA, 2019 annual revenue from Airbnb was around $5.87 million and 2018 annual revenue was around $4.26 million.
- Without knowing exact occupancy and rate information, it is difficult to estimate revenue because there is so much variability in the market.

<table>
<thead>
<tr>
<th></th>
<th>Rental Units</th>
<th>Nightly Rate</th>
<th>Annual Occupancy</th>
<th>Annual Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Estimate – includes all rentals</td>
<td>447</td>
<td>$172.34</td>
<td>27%</td>
<td>$7.59 million</td>
</tr>
<tr>
<td>Low Estimate – includes only units with documented stays in the last year</td>
<td>282</td>
<td>$166.26</td>
<td>27%</td>
<td>$4.61 million</td>
</tr>
<tr>
<td>Kalibri Labs &amp; AirDNA Data – 2018</td>
<td>420</td>
<td>$102.87</td>
<td>27%</td>
<td>$4.26 million</td>
</tr>
<tr>
<td>Kalibri Labs &amp; AirDNA Data – 2019</td>
<td>514</td>
<td>$112.97</td>
<td>28%</td>
<td>$5.87 million</td>
</tr>
</tbody>
</table>
Estimated TOT

If all short-term rental units paid the 8% Transient Occupancy Tax (TOT), annual total TOT is estimated to be between $368,800 and $607,200.

• Currently TOT is only required for units that sleep 4 or more people. That portion of TOT is around $179,780 - $236,340.

• If the TOT occupancy threshold was eliminated such that all rental units paid TOT, regardless of their capacity, that would generate an estimated additional $146,000 - $260,000.

<table>
<thead>
<tr>
<th></th>
<th>Annual Revenue</th>
<th>8% TOT</th>
<th>TOT from units hosting 1-3 people</th>
<th>TOT from units hosting 4+ people</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Estimate – includes all rentals</td>
<td>$7.59 million</td>
<td>$607,200</td>
<td>$262,600*</td>
<td>$236,340*</td>
</tr>
<tr>
<td>Low Estimate – includes only units with documented stays in the last year</td>
<td>$4.61 million</td>
<td>$368,800</td>
<td>$147,460</td>
<td>$179,780</td>
</tr>
</tbody>
</table>

*7% of units are unknown ($37,370 in TOT)

County TOT information: https://www.loudoun.gov/1589/Transient-Occupancy-Tax
Compliance

About a quarter of rental units are compliant in registering with the county.

- It is difficult to track exactly because registrations are ongoing and are required to be updated annually.
Glossary

• Rental Unit – The physical property that is being rented. A rental unit can have more than one listing.
• Listing – How a property is displayed on various STRR websites
  – Note: Because of the way data is pulled from listings and then matched up to rental units, some data fields are affiliated with only the listing (e.g. nightly rate or listing website) and others are affiliated with both the listing and rental unit (e.g. number of bedrooms)
• STRR – Short-term residential rental - a residential property that is rented out for 30 days or less. This does not include permitted B&Bs and hotels in Loudoun that may use STRR platforms like Airbnb for marketing and booking.
• Last Documented Stay – This is not an exact field. It is estimated based on calendar availability and recent reviews left.
• Nightly Rate – The rate on the listing. Includes cleaning and other fees.
| Management | Owner of the premises shall reside on the premises and manage the Bed and Breakfast Homestay. | Owner or Manager of the premises shall provide full-time management at all times when the Bed and Breakfast Inn is occupied by overnight guests or private party attendees. | Owner or Manager of the premises shall provide full-time management at all times when the Country Inn is occupied by overnight guests or private party attendees. | Contact information of the Operator and/or Manager must be provided in writing to guests of the Short-Term Rental – Commercial Whole-House (STR-CWH) use and located in a conspicuous location. There is no requirement for the Operator to be present on the parcel during rental periods. The operator or manager must be available at all times when the property is occupied by renters and must respond within 30 minutes via phone or email and be available on site within 60 minutes. | The Operator shall reside on the parcel that contains the Short-Term Rental – Residential Accessory (STR-RA) use for a minimum of 185 days per calendar year. Contact information of the Operator and/or Manager must be provided in writing to guests of the Short-Term Rental-Residential Accessory use and located in a conspicuous location. There is no requirement for the Operator to be present on the parcel during rental periods. The operator or manager must be available at all times when the property is occupied by renters and must respond within 30 minutes via phone or email and be available on site within 60 minutes. |
| Operating Days per Year | Unlimited (N/A) | Unlimited (N/A) | Unlimited (N/A) | Unlimited (N/A) | Maximum of 180 days per calendar year |
| Number of Guest Rooms | 1-4 Guest Rooms. | 1-10 Guest Rooms. | 1-40 Guest Rooms. | The number of Guest Rooms shall not exceed 5. The number of guests per night shall not exceed 10 or less depending on building code and/or individual sewage disposal system requirements. | Maximum of 4 guest rooms; maximum of 8 guests per night per parcel or less depending on building code and/or individual sewage disposal system requirements. Maximum of 4 guests in multi-family dwelling unit or single family attached developments with multiple principal dwelling units on a single parcel or lot. |
| Minimum Lot Size | No Minimum Lot Size. | Minimum 5 Acres. | Minimum 20 Acres. | 6 or fewer guests: No minimum lot area (zoning district requirement) Greater than 6 guests: 5-acre minimum. | No Minimum Lot Size (Zoning District Requirements). |
| Daily Private Parties (Attendees) | Maximum 20 Attendees, including overnight guests. | Maximum 50 Attendees, including overnight guests. | Maximum 100 Attendees, including overnight guests. | Private parties and/or Special Events pursuant to Section 5-500(C) are not permitted in association with the STR-CWH use. | Private parties and/or Special Events pursuant to Section 5-500(C) are not permitted in association with the STR-RA use. |
| Yearly Private Parties (Attendees) | 10 Yearly Private Parties >20 Attendees, subject to individual Zoning/Building Permit. | 20 Yearly Private Parties >50 Attendees, subject to individual or annual Zoning/Building Permit. | 20 Yearly Private Parties >100 Attendees, subject to individual or annual Zoning/Building Permit. | Private parties are not permitted in conjunction with the STR-CWH use. | Private parties are not permitted in conjunction with the STR-RA use. |
| Hours of Operation | All Private Parties shall be limited to 7:00 AM to midnight. | All Private Parties shall be limited to 7:00 AM to midnight. | All Private Parties shall be limited to 7:00 AM to midnight. | No specified hours of operation (no private parties permitted). | No specified hours of operation (no private parties permitted). |
| Noise | Shall not exceed 55dB(A) at the property line. No outdoor music shall be permitted between 11:00 PM and 10:00 AM on Friday, Saturday, and any evening preceding a holiday recognized by Loudoun County, and between 10:00 PM and 10:00 AM any other day. | Shall not exceed 55dB(A) at the property line. No outdoor music shall be permitted between 11:00 PM and 10:00 AM on Friday, Saturday, and any evening preceding a holiday recognized by Loudoun County, and between 10:00 PM and 10:00 AM any other day. | Shall not exceed 55dB(A) at the property line. No outdoor music shall be permitted between 12:00 AM (midnight) and 7 AM. | No additional noise regulations. General Noise Standards in Zoning Ordinance Section 5-1507 Performance Standards apply. | No additional regulations. General Noise Standards in Zoning Ordinance Section 5-1507 Performance Standards apply. |
| **Comparison of Bed and Breakfast, Country Inn, and Proposed Short-Term Rental Uses** | **BED AND BREAKFAST HOMESTAY**  
(Section 5-601(A)) | **BED AND BREAKFAST INN**  
(Section 5-601(B)) | **COUNTRY INN**  
(Section 5-601(C)) | **Short-Term Rental – Commercial Whole-House Use**  
(Section 5-670) (DRAFT) | **Short-Term Rental – Residential Accessory Use**  
(Section 5-669) (DRAFT) |
<table>
<thead>
<tr>
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<th></th>
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<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Yard Requirements</strong></td>
<td>Use and Parking: Subject to Zoning District Requirements.</td>
<td>Use: Subject to Zoning District Requirements. Parking: 40 feet from all lot lines (Yard Standards).</td>
<td>Use and Parking: 100 feet from all lot lines. Outdoor Private Parties: 200 feet from all lot lines unless adjacent to commercial property then 100 feet.</td>
<td>All structures used for the STR-CWH use must be set back a minimum of 15 feet from all lot lines or the minimum yard requirements of the applicable zoning district, whichever is greater.</td>
<td>Subject to Zoning District Requirements for the permitted principal use.</td>
</tr>
<tr>
<td><strong>Minimum Parking</strong></td>
<td>2.5/dwelling unit; 1/guest room; .33/permitted private party attendee.</td>
<td>2.5/dwelling unit; 1/guest room, 1/employee; .33/private party attendee.</td>
<td>1/guest room; 15,000 sq. ft. for restaurants &amp; kitchen area only; .33/permitted private party attendee</td>
<td>2/dwelling unit or 1/room used for overnight guests, whichever is greater; 1/Operator and/or Manager. On street parking does not count towards required parking.</td>
<td>1 space for up to 4 guests; 2 spaces for 5-8 guests, in addition to required spaces for existing dwelling unit. On street parking does not count towards required parking.</td>
</tr>
<tr>
<td><strong>Landscaping</strong></td>
<td>Outdoor Private Party areas shall meet the requirements of Section 5-1404(A)(6), regardless of the size of the adjacent property. This requirement may be waived or modified. See Section 5-601.</td>
<td>Outdoor Private Party areas shall meet the requirements of Section 5-1404(A)(6), regardless of the size of the adjacent property. This requirement may be waived or modified. See Section 5-601.</td>
<td>Outdoor Private Party areas shall meet the requirements of Section 5-1404(A)(6), regardless of the size of the adjacent property. This requirement may be waived or modified. See Section 5-601.</td>
<td>Subject to Zoning District and Zoning Ordinance Requirements.</td>
<td>Subject to Zoning District and Zoning Ordinance Requirements for the permitted principal use.</td>
</tr>
<tr>
<td><strong>Access/Entrance</strong></td>
<td>If establishment is not located on a publicly maintained road, documentation shall be provided demonstrating that the private access easement serving such lot may be used to support the establishment.</td>
<td>Subject to Section 5-654. No more than two access points. If establishment is not located on a publicly maintained road, documentation shall be provided demonstrating that the easement may be used to support the establishment.</td>
<td>Subject to Section 5-654. No more than two access points. If establishment is not located on a publicly maintained road, documentation shall be provided demonstrating that the easement may be used to support the establishment.</td>
<td>If establishment is not located on a Class I or Class II Road, documentation shall be provided demonstrating that the private access easement serving such lot may be used to provide access to the STR-CWH use.</td>
<td>Subject to Zoning District and Zoning Ordinance Requirements for the permitted principal use.</td>
</tr>
</tbody>
</table>
| **Zoning Districts**  
| | | | No Restaurant  
Permitted Use: AR-1, AR-2, RC, and PD-RV(CVCWA).  
With Restaurant  
Permitted Use: AR-1 and AR-2 (<100 people), and RC and PD-RV(CVCWA).  
SPMI Use: AR-1 and AR-2 (>100 people).  
<table>
<thead>
<tr>
<th>Land Development Applications</th>
<th>Bed and Breakfast Homestay (Section 5-601(A))</th>
<th>Bed and Breakfast Inn (Section 5-601(B))</th>
<th>Country Inn (Section 5-601(C))</th>
<th>Short-Term Rental – Commercial Whole-House (Section 5-670) (DRAFT)</th>
<th>Short-Term Rental – Residential Accessory (Section 5-669) (DRAFT)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Site Plan &gt; 5,000 sq. ft. of disturbance or Sketch Plan &lt; 5,000 sq. ft. of disturbance</td>
<td>Minor Special Exception and/or Site Plan &gt; 5,000 sq. ft. disturbance or Sketch Plan &lt; 5,000 sq. ft.</td>
<td>Special Exception or Minor Special Exception and/or Site Plan</td>
<td>Special Exception or Minor Special Exception and/or Drawing accompanying Zoning Permit</td>
<td>Minor Special Exception and/or Drawing accompanying Zoning Permit</td>
</tr>
<tr>
<td></td>
<td>Zoning Permit/Building Permit for each Private Party &gt;20 attendees (10 per calendar year).</td>
<td>Annual Private Party Zoning Permit/Building Permit for Private Parties &gt;50 attendees (20 per calendar year).</td>
<td>Annual Private Party Zoning Permit/Building Permit for Private Parties &gt;50 attendees (20 per calendar year).</td>
<td>Zoning Permit/Building Permit for Use with Drawing.</td>
<td>Zoning Permit/Building Permit for Use with Drawing.</td>
</tr>
</tbody>
</table>