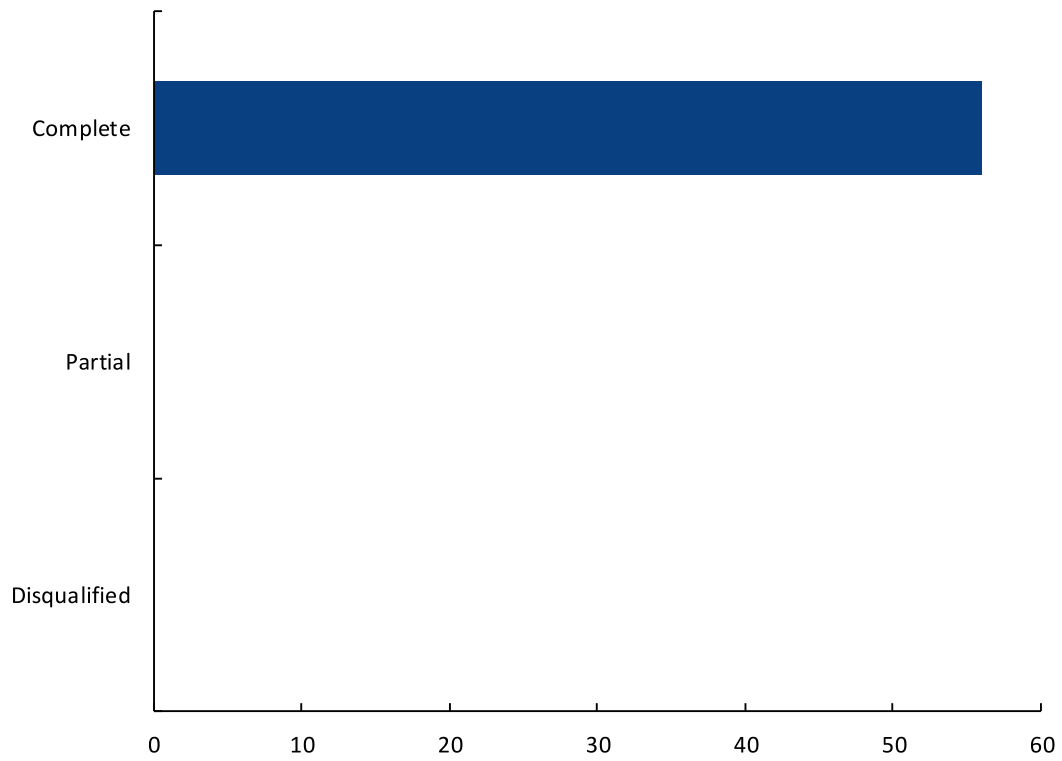


# Report for Proposed Short-Term Rental Regulations Feedback

Proposed Short-Term Rental Regulations Feedback

## Response Statistics



	Count	Percent
Complete	56	100
Partial	0	0
Disqualified	0	0
Totals	56	

**1. In the box below, please provide your comments.**

ResponseID	Response
1	I think these regulations make more sense. I am glad that current operators will continue to be able to operate. I think having reasonable regulations makes sense.
2	I think this is absolutely ridiculous and just another way for you guys to try and take money from hard working people. \$350 annual license fee is outrageous.
3	Doe not support. Please do not enact these regulations. They will destroy this market which already operates on a very thin margin. May have good intensions; however, the cosequences are devaststing.
4	I understand Airbnb already govern most of these concerns so charging home owners more will hurt their business. But yes it would get rid of all the people just buying up houses and not living there who are renting to big parties and not managing them close by.
5	\$350 annual license fee is ridiculous and seems just like another way for you guys to make money of hard working people. Stop trying to make Colorado into California!!!
6	Regarding Legacy Exemptions - It must be clear that the Exemption is not transferable upon the

	<p>sale of the property. This is the only tool to address situations of high density STRs currently in place.</p>
7	<p>agree with most of the proposal stipulations for IN TOWN rentals, as there are more challenges with the close nature of homes and high density housing. I agree that it should be the property owner that can lease their home; whether it is their primary residence or not. I share a room on Air BnB, and would not be pleased if a tenant of mine sublet any part of my home. I've rented homes in the past and now the room and have experienced that overall, renters do not take care of the property/space they are renting and the owner should be engaged and aware of all happenings with/on their property. I disagree with the an annual cap; realizing that over 180 days may be considered 'long term rental'; however, if the homeowner is using AirBnB or VRBO, they are already paying for support/insurance to those they are renting to. If I want to rent my home/room to a person for 1 day, 1 year or 5 years that should be between myself and the renter. I also disagree with the application and licensing fees; they are quite high. Perhaps there needs to be a different provision for the rural areas; but there are times that people are traveling through and I only rent that room 5 times a year. Your licensing fees would surpass the rental 'income' I would receive. Those people would then be out of a place to stay that may be easier/more affordable than going to the next town, and I out of that little bit of</p>

	<p>income that helps in today's world. While I overall support some of the government controls being put in place; the government is also making it harder for us to share space affordably, and make living in our homes more affordable to ourselves with the rising costs of property taxes and insurance. I will be monitoring for upcoming legislation. I'm guessing my input will not assist this process; but am thankful of the opportunity.</p>
8	<p>We oppose the adoption of the proposed short-term rental (STR) regulations and believe they should not be approved. These restrictions could significantly slow the growth of small businesses. For many homeowners, short-term rentals are an important source of additional income. The adoption of these rules would deprive ordinary residents of the opportunity to earn from their property. Meanwhile, large hotel corporations will continue to expand and increase their profits, while individual homeowners will be placed at a disadvantage. This creates unequal conditions and effectively supports big business at the expense of ordinary families. Short-term rentals also provide more affordable lodging options for budget-conscious travelers. Limiting such offerings will reduce choice and make travel less accessible. In our neighborhood, short-term rentals are not widespread. The main activity is concentrated in downtown Denver, not here. Therefore, there is no reason to impose strict restrictions in our area. Responsible short-term rentals contribute to tax revenues, which are used to develop infrastructure — roads, parks,</p>

	<p>and schools. Instead of prohibitive measures, conscientious owners should be supported. We believe these regulations are unnecessary and do not align with the interests of the local community.</p>
9	<p>I am opposed to the proposed short-term rental regulations and ask that they not be adopted. As a homeowner, I rely on income from short-term rentals to help cover my mortgage and household expenses. Limiting this option would place a real financial burden on families like mine, who are not running large businesses but simply trying to make ends meet. Short-term rentals also allow me to host guests from around the world, fostering cultural exchange and strengthening our local community. Restricting these opportunities would reduce personal connections and the sense of community that many residents value. I also believe responsible short-term rentals help keep our neighborhoods safe and well-maintained. I follow all rules, pay all taxes, and take care of my property, which benefits both neighbors and the city. Penalizing conscientious homeowners like me is unfair. Finally, restricting short-term rentals could hurt tourism and local businesses. Many visitors choose private homes because hotels are expensive or unavailable, and reducing available rentals decreases demand for restaurants, shops, and attractions in our area. I respectfully ask that these regulations not be implemented, and that the city consider ways to support responsible homeowners rather than</p>

	impose unnecessary restrictions.
10	<p>I respectfully oppose the proposed short-term rental (STR) regulations in unincorporated Arapahoe County. While I understand the intention to address concerns related to neighborhood quality of life, safety, and housing availability, the current proposal appears overly restrictive and may create unintended economic and legal consequences for responsible property owners. First, the primary residence requirement significantly limits property rights. Many homeowners rely on short-term rentals as supplemental income, especially in periods of economic uncertainty. Restricting STR operations only to primary residences excludes responsible owners who may operate vacation or investment properties without causing neighborhood disruption. Second, the proposed 500-foot separation rule artificially limits market participation without clear evidence that proximity alone causes nuisance issues. Problematic behavior is typically linked to specific operators or guests — not to density in itself. Enforcement should focus on violations (noise, parking, safety), not blanket geographic restrictions. Third, the cumulative regulatory burden — licensing, insurance mandates, spacing rules, occupancy caps, and rapid response agent requirements — may disproportionately impact small, individual property owners while larger corporate operators can more easily absorb compliance costs. This risks consolidating the market rather than protecting neighborhoods.</p>

	<p>Additionally, STRs contribute to the local economy through tourism spending, local business support, property tax revenue, and increased property maintenance standards. Overregulation may reduce economic activity without demonstrable housing affordability benefits, especially if STRs represent only a small fraction of total housing stock. A more balanced approach would focus on:</p> <ul style="list-style-type: none"> <li>• Clear nuisance enforcement mechanisms <ul style="list-style-type: none"> <li>• Strong penalties for repeat violators</li> <li>• Data-driven evaluation before implementing broad restrictions</li> <li>• Fair grandfathering protections for existing operators</li> </ul> </li> </ul> <p>Regulation should target misconduct, not responsible ownership. Property rights, economic opportunity, and proportional governance must remain central considerations. For these reasons, I urge reconsideration and revision of the proposed STR framework to ensure it is balanced, evidence-based, and equitable.</p>
11	<p>I oppose the proposed short-term rental regulations in unincorporated Arapahoe County because they introduce broad structural restrictions without clear data demonstrating that such measures are necessary or effective. The proposal assumes that short-term rentals inherently create neighborhood instability, yet there is limited public evidence showing that existing enforcement tools are insufficient. Before imposing new licensing layers and geographic spacing rules, the County should demonstrate</p>

	<p>that current nuisance laws, noise ordinances, and safety codes cannot address the concerns being cited. The 500-foot distancing requirement, in particular, appears arbitrary. There has been no transparent data showing that STR proximity correlates directly with measurable harm. Policy decisions should be based on empirical evidence, not precautionary assumptions. Moreover, heavy regulation may unintentionally reduce housing flexibility. Homeowners often use short-term rentals temporarily during life transitions — relocation, job changes, financial hardship, or seasonal employment. Overregulation removes that flexibility and may discourage property investment in the county altogether. There is also a risk that strict entry barriers will reduce competition and push STR activity underground or into neighboring jurisdictions, weakening oversight rather than improving it. Effective governance should prioritize proportionality. If specific operators create problems, enforcement should target those actors directly rather than restricting the broader community of responsible property owners. I encourage the County to slow implementation, publish detailed impact data, and consider a narrower, performance-based regulatory framework instead of preemptive structural limitations.</p>
12	<p>I am a resident of unincorporated Arapahoe County and operate a short-term rental (Airbnb) out of my primary residence here. I strongly oppose key parts of the proposed regulations,</p>

	<p>particularly the \$200 application fee and \$350 annual license fee. These fees total \$550 in the first year alone, which is excessively high for small-scale hosts like me who rent out a room or portion of my own home to supplement income. This is not a large commercial operation—it's a responsible way to earn extra money while living in the property full-time. The fees would significantly cut into my earnings, making it unsustainable and potentially forcing me to stop hosting altogether. Additionally, restricting short-term rentals to only the applicant's primary residence is unfair and overly limiting. This rule would prohibit renting out an entire property (such as a whole home or vacation property), even if done responsibly with proper management and compliance. Many Airbnb owners rely on whole-home rentals as their primary model to generate meaningful income, support tourism in our area, or manage investment properties. The proposal would hurt the majority of hosts who do not—or cannot—live full-time at every rental property, reducing housing options for visitors and economic benefits for the community.</p>
13	<p>I understand these are popular now, but the comfort and well being of the current neighborhoods and those residents should carry more weight than someone trying to run a business in residential neighborhoods. No matter what restrictions are put in place, noise and traffic are going to be increased. Why are local and state governments continually trying to</p>

	<p>destroy suburban neighborhoods? If we wanted to live with constant hustle and bustle, we'd live in the city!</p>
14	<p>There definitely needs to be a impactful consequence if the rules are not followed, including the lack of a responsible agent being available, especially when there is a significant renter issue. Thank you for considering this input.</p>
15	<p>1.Please provide a better definition of a STR 2. define amount and type of insurance that will be required 3. Are you suggesting a STR inspection and who would complete this</p>
17	<p>Short-term rentals are good for the economy, and at this point, have been proven safe. If the county were to enact restrictions, it should certainly grandfather in or provide a way for exceptions.</p>
18	<p>I am Not in favor of short term rentals OR a legacy exemption. I have had too many vagrants and noisy people near my resident condo.</p>
19	<p>I am writing to express my strong opposition to the proposed Short-Term Rental (STR) regulations for unincorporated Arapahoe County. While I support responsible property management, the current proposal overreaches in ways that infringe on private property rights and create arbitrary barriers for homeowners. 1. The Primary Residence Requirement is Too Restrictive The requirement that an STR must be the owner's primary residence effectively bans</p>

"second home" or investment property owners from the market. • The Argument: Many residents rely on STR income to maintain properties they intend to retire in or keep within their families. Restricting licenses to primary residents penalizes responsible "mom and pop" investors while doing little to address actual nuisance issues. • Alternative: The County should consider a 180-day annual cap on rentals for non-primary residences instead of an outright ban. 2. The 500-Foot Rule Creates "First-Come" Monopolies The 500-foot separation requirement is an arbitrary distance that picks winners and losers based solely on who applies for a license first. • The Argument: This rule creates a "geographic monopoly." If a neighbor 490 feet away secures a license, my property value and income potential are immediately diminished through no fault of my own. This is an inequitable approach to zoning that lacks a clear tie to neighborhood safety. 3. The "Local Agent" Response Times are Unrealistic Requiring a designated agent to be reachable in 15 minutes and on-site in 60 minutes is a standard designed for large hotels, not individual homeowners. • The Argument: This requirement forces homeowners to hire expensive professional management companies, as many owners may live 65 or 70 minutes away. It creates an undue financial burden and ignores the fact that most "concerns" can be handled via phone or smart-home technology (like noise monitors). 4. The 60-Day "Legacy" Window is a Trap A 60-day window to apply for a legacy

	<p>exemption is dangerously narrow for a new regulatory regime. • The Argument: Homeowners who are traveling, dealing with health issues, or simply unaware of the new ordinance could lose their existing business rights forever. This "use it or lose it" window is punitive rather than helpful. Conclusion Instead of creating a dense new layer of bureaucracy and high fees (\$550 in the first year), the County should focus on enforcing existing noise, parking, and trash ordinances. These regulations punish the majority of responsible hosts to solve the problems caused by a few bad actors.</p>
20	<p>I support the inclusion of the legacy proposal and trusts that consideration is being given to properties that were especially constructed for STRs versus just residential use. (Such as former hotels and other lodgings).</p>
21	<p>I have a campfire, which my guests love. I understand the safety precaution. However, could the board consider modifying the "NO CAMPFIREs" to something like ensuring that any campfire setup follows local fire codes and that the guests must be informed to have a hose spigot within 100 ft or so of the fire? Also, hosts would be responsible for notifying guests if there is a Stage 1 or Stage 2 Burn Ban in effect.</p>
22	<p>Strongly oppose! There is no way to enforce. The cost of implementation and enforcement will far exceed any licensing fees. Arapahoe county is already understaffed and non-responsive. adding</p>

	<p>yet another regulatory group is irresponsible. Why don't you enforce regulations that already exist?</p>
23	<p>I am concerned that the Legacy designation, while allowing existing operators to continue, is structured in a way that almost guarantees eventual loss of a license. Missing a renewal deadline or a minor administrative error could permanently revoke a Legacy license. Combined with the County's broad "quality of life" enforcement language, this creates uncertainty — anything a neighbor complains about could be used as grounds for suspension or revocation. Adding the 15-minute live response requirement for LRAs makes compliance even more challenging, particularly for smaller operators. The Director's broad discretion to deny, suspend, or revoke a license without clear objective standards amplifies these risks. Legacy operators need stronger procedural protections, grace periods, and clearer criteria for enforcement to ensure that longstanding lawful rentals aren't unfairly taken away.</p>
24	<p>Page 2: Def of Owner needs more detail. There is active movement in both the White House and Congress to limit corporations ("persons" under the law) from buying single-family homes. President Trump signed an executive order on January 20, 2026, to restrict these purchases and has since called on Congress to make these limits permanent through legislation. Section 5 (H) would allow 12 renters in my house.</p>

	<p>Centennial Ordinance limits occupancy to 5. Scarce parking here. Need maximum of 5 renters. Clarify 2 PAVED parking spaces.</p>
25	<p>The Legacy designation is critical for short term rentals, but these rules make it fragile and unpredictable. The renewal deadline is too far in advance and unnecessary and feels like a trip up. Submitting paperwork late, or being subject to a subjective "quality of life" complaint could result in permanent license loss. The 15-minute direct response requirement for LRAs is unrealistic and places a heavy burden on operators who may live offsite or have other responsibilities or just not have their phone holstered to their hip at all times. The Director's ability to revoke licenses without clear standards adds further uncertainty. Legacy licenses should have clear procedural safeguards, realistic response expectations, and protections against minor or administrative violations to ensure that existing, legal short-term rentals can continue to operate responsibly.</p>
26	<p>The proposed 500-foot spacing requirement raises serious concerns about fairness and basic property rights. The planning commission rejected this plan in 2025. This approach essentially allows one approved short-term rental to block surrounding homeowners from using their property in the same way. That creates unequal treatment between neighbors who own similar homes and pay identical property taxes. Land use regulations are typically designed to address impacts such as density, traffic, parking,</p>

	<p>or safety. A blanket buffer zone does not directly regulate those issues. Instead, it limits opportunity based purely on distance from another licensed property. There is no clear explanation of why 500 feet is the appropriate number or how that distance reduces measurable neighborhood impacts. Many homeowners have invested substantial personal savings into purchasing their homes. They carry mortgages, pay rising insurance costs, and shoulder long-term financial obligations. With that level of risk and responsibility, they should retain reasonable autonomy over how their property is used, provided they comply with safety standards and nuisance laws. Licensing requirements, insurance mandates, and occupancy limits are understandable tools for maintaining order. However, imposing a primary residence requirement and strict separation rule shifts from regulating behavior to restricting ownership choices. That is a significant policy step that deserves reconsideration.</p>
27	<p>Public Comment – LDC23-001 Boston Commons previously submitted a unified petition in 2025 representing 104 units in support of legacy consideration for long-standing Short-Term Rental properties. We appreciate the inclusion of a proposed Legacy provision in the revised draft. Recognizing properties that were operating prior to County regulation promotes fairness and regulatory stability. Boston Commons is a Mixed-Use, hotel-origin property that has operated as an STR facility for over two decades. Our use</p>

	<p>reflects the property's original lodging-based design and long-standing function. As the County finalizes the Legacy framework, we respectfully request consideration of how termination of Legacy eligibility upon full transfer of ownership may affect historically lodging-based properties. For properties such as ours, STR use has functioned as a property-based use rather than an incidental residential activity. We support thoughtful regulation and appreciate the opportunity to provide input. Respectfully, Nadine Johns</p>
28	<p>The legacy license rules feel like a temporary window that can easily close due to minor infractions or missed deadlines. Legacy operators could be removed permanently even after years of responsible management. The "quality of life" enforcement standard is subjective, giving the Director broad discretion to take action on complaints that may be trivial or unverified. Requiring the LRA to respond directly within 15 minutes, with physical response within 60 minutes, is extremely burdensome for small operators. Combined, these requirements create significant uncertainty for Legacy operators, essentially setting them up to fail. Reasonable procedural protections, grace periods, and objective enforcement criteria are necessary to preserve the intent of the Legacy designation.</p>
29	<p>The proposed 500-foot spacing requirement raises serious concerns about fairness and basic property rights. The planning commission</p>

	<p>rejected this plan in 2025. This approach essentially allows one approved short-term rental to block surrounding homeowners from using their property in the same way. That creates unequal treatment between neighbors who own similar homes and pay identical property taxes. Land use regulations are typically designed to address impacts such as density, traffic, parking, or safety. A blanket buffer zone does not directly regulate those issues. Instead, it limits opportunity based purely on distance from another licensed property. There is no clear explanation of why 500 feet is the appropriate number or how that distance reduces measurable neighborhood impacts. Many homeowners have invested substantial personal savings into purchasing their homes. They carry mortgages, pay rising insurance costs, and shoulder long-term financial obligations. With that level of risk and responsibility, they should retain reasonable autonomy over how their property is used, provided they comply with safety standards and nuisance laws. Licensing requirements, insurance mandates, and occupancy limits are understandable tools for maintaining order. However, imposing a primary residence requirement and strict separation rule shifts from regulating behavior to restricting ownership choices. That is a significant policy step that deserves reconsideration.</p>
30	<p>Thanks for adding the Legacy section to the draft. It's a great start for those of us who have been doing this for years. I'd ask the Board to consider</p>

	<p>making this status stay with the property even if it's sold. Letting the status transfer would provide real long-term stability for our neighborhood.</p> <p>Caden Wang</p>
31	<p>I recently purchased a unit in a community that has operated as a short-term rental property for many years. The long-standing STR use was an important factor in my decision to purchase. I appreciate the County's effort to include a Legacy provision recognizing properties that were operating prior to regulation. For communities with a long history of lodging-style STR use, continuity of that use is important. As the County finalizes the Legacy framework, I respectfully ask that consideration be given to whether Legacy eligibility should remain with the property when ownership changes, particularly for communities where short-term rental use has been an established and long-standing feature of the property. Thank you for the opportunity to provide input. Bobby Etesami</p>
32	<p>The 500 foot separation clause is arbitrary and will penalize some neighbors more than others simply because yards or houses might be bigger. It penalizes new owners over previous owners. STR owners are much more resistant to allowing parties and the associated wear and tear and cleaning impacts than standard home owners that can throw parties with negative neighborhood impact just as easily with their friends. I suspect more parties and disruptive behavior is caused by basic home owners than</p>

	<p>STR owners who almost always have a "no parties" clause in the agreement.</p>
33	<p>Will there be additional restrictions on how many days our primary residence can be rented out? Are you planning to follow Denver County's lead here? I feel like there may be more to know about the primary residence requirement that I'm not fully seeing here. Thank you for the opportunity to provide comment and hear your thoughts as well.</p>
34	<p>We are long-time property owners in unincorporated Arapahoe County and own a condominium there. I am writing to express strong opposition to the proposed Short-Term Rental regulations contained in Code Amendment LDC23-001. When we purchased our property, the ability to rent it either long-term or short-term was an important part of its value and part of our retirement financial planning. The proposed ordinance would significantly restrict or eliminate that flexibility for many condominium owners through the proposed primary-residence requirement and the extremely limited cap on multifamily short-term rental licenses. This reduction in potential usage would drastically reduce current values. The proposed cap of 100 licenses for all multi-family properties appears arbitrary and unsupported by evidence of there being an overload of rentals. I have not seen any analysis explaining why this number was selected or what specific problem it is intended to solve. Without clear data demonstrating</p>

widespread issues related to short-term rentals in unincorporated Arapahoe County, this type of restrictive cap appears to be a solution in search of a problem. Additionally, the public feedback cited in support of this proposal raises serious concerns about methodology. Surveys were conducted across the entire county population rather than focusing specifically on residents of the unincorporated areas where these regulations would apply. By sampling individuals who do not live in the affected jurisdiction, the results cannot accurately reflect the views or experiences of the residents most directly impacted. Policies affecting unincorporated communities should be based on feedback from those communities, not from residents of municipalities that are governed by entirely different rules. Equally important is the lack of transparency regarding the historical record of complaints related to short-term rentals in unincorporated Arapahoe County. If there are documented problems—such as noise, parking, or safety concerns—it would be helpful to see objective data demonstrating the scale and frequency of those issues, and what remedies have been applied. Without that information, it is difficult to justify imposing sweeping restrictions that will significantly affect property owners' rights and financial interests. Our livelihood will potentially be subjected to substantial reductions. For existing property owners, the consequences of this proposal are substantial. Limiting short-term rentals through license caps and non-

	<p>transferable approvals will reduce the marketability of properties and diminish resale value. Many owners purchased their homes under the reasonable expectation that both short-term and long-term rental options would remain available. Removing that flexibility after the fact effectively changes the economic assumptions under which those investments were made. I respectfully ask the Board of County Commissioners to reconsider the scope of these restrictions. At a minimum, the County should:</p> <ul style="list-style-type: none"><li>• Provide clear data demonstrating the extent of documented problems caused by short-term rentals in unincorporated areas.</li><li>• Explain the analytical basis for the proposed cap of 100 multifamily licenses.</li><li>• Reevaluate the validity of survey data collected from residents outside the affected jurisdiction.</li><li>• Protect existing property owners through meaningful grandfathering provisions and policies that preserve reasonable rental flexibility. Responsible short-term rental operators can coexist with residential communities and contribute to the local economy without creating undue impacts. Regulations should be targeted and evidence-based rather than broadly restrictive in ways that disproportionately harm existing property owners.</li></ul> <p>Thank you for considering these concerns and for carefully evaluating the long-term consequences this proposal may have on property owners in unincorporated Arapahoe County.</p>
35	<p>I believe the ordinance goes too far in controlling how private property can be utilized. While</p>

	<p>oversight and licensing are reasonable to prevent abuse, the primary residence mandate and 500-foot restriction fundamentally limit what homeowners are allowed to do with their own investment. The spacing rule functions like a gatekeeper. Once a single property in an area is approved, nearby owners are effectively shut out, regardless of how responsibly they might operate. That system favors whoever applies first rather than evaluating each property on its merits. It also creates long-term limitations that could affect resale value and financial planning. Owning a home involves significant financial exposure. Buyers commit to decades of payments and assume the risks associated with market changes, maintenance costs, and taxation. It seems inappropriate for the government to dictate residency status as a condition of lawful use when the activity itself can be regulated through enforceable standards. If the goal is to preserve neighborhood character, that can be achieved through noise enforcement, parking rules, occupancy caps, and safety inspections. Broad geographic bans and residency restrictions are blunt instruments that unnecessarily interfere with homeowner flexibility. A more targeted, impact-based approach would better balance community concerns with individual rights.</p>
36	<p>I am deeply troubled by the potential consequences this ordinance may have for homeowners, both in the immediate future and over time. The proposed 500-foot spacing rule</p>

and the requirement that a property be a primary residence move beyond regulating conduct and instead dictate whether a homeowner is allowed to use their property in this manner at all. In practice, this means that once a single short-term rental is approved within a certain area, nearby homeowners could be prevented from doing the same — even if they pay identical taxes, properly maintain their homes, and follow all safety requirements. That approach does not reflect typical land-use policy; rather, it restricts property rights based on proximity instead of actual impacts on the neighborhood. The so-called legacy provision also raises serious concerns. While it appears intended to protect current operators, the structure of the policy makes it very easy for those licenses to be permanently lost in the future. Simple administrative mistakes, missed renewal deadlines, or complaints evaluated under a vague "quality of life" standard could lead to revocation. The added requirement that a Local Responsible Agent respond within 15 minutes places an unrealistic expectation on many homeowners, especially smaller operators, while granting broad discretionary authority to the Director. Taken together, these elements create an environment of instability and uncertainty for homeowners attempting to follow the rules. Many homeowners have invested significant time, money, and effort into their properties while contributing to the surrounding community. Establishing reasonable licensing requirements and safety regulations can be an appropriate way

	<p>to protect neighborhood interests. However, rigid spacing requirements, primary residence restrictions, and fragile legacy licensing frameworks do not achieve a fair balance. Policies should focus on tangible issues such as noise, parking, and occupancy limits rather than limiting property use based on location or imposing severe penalties for minor administrative issues.</p>
37	<p>The new compliance requirements present some significant operational hurdles. Regarding the requirement for a primary guest contact: how should we manage situations where that host POC is traveling or ill? Updating both the in-unit information and the County records for every temporary absence seems highly impractical. I suggest making sure the guest to simply have access to a secondary contact via the booking app or email/phone for emergencies - it's very easy to proof. Additionally, the \$550 annual license fee is quite high. Could you clarify if this is a recurring annual application process, or if the fee applies only to the initial filing? An annual cost of that magnitude is a significant burden on local hosts. Lastly, I personally had a neighbor that once complained on noise even when I didn't host anyone, without real proof can my license get revoked in these kind of situations? I'm very concerned about unreasonable neighbors (which in some cases are competitors) complaining about me and putting me at risk.. Need more clarity what the county enforces.</p>

38	<p>I'm worried about the Legacy license. It lets me run my short-term rental, but it doesn't feel very safe. If I miss a renewal date or make a mistake, my license could be taken away for good. The "quality of life" rules are also very broad. If a neighbor complains about something, it could count as a violation even if it's a small issue. The 15-minute response rule makes this even harder. What if we are driving and it's not safe to answer the phone for example? Many people don't have someone sitting nearby all the time to answer a call. Life happens — people could be at work, driving, or busy with kids. Expecting an answer that fast every time is not realistic and could lead to problems when I'm trying to follow the rules. The Director also has a lot of power to deny, suspend, or revoke licenses, and it's not clear standards. I've been running my home for years without complaint. I need clearer rules, some grace periods or a fine for a late renewal, and better protection so I don't lose my license over minor issues.</p>
39	<p>March 5, 2026 Arapahoe County Board of County Commissioners 5334 S Prince St Littleton, CO 80120 Re: Concerns Regarding Proposed Short-Term Rental Ordinance Dear Commissioners, On behalf of the Colorado Short-Term Rental Association (COSTRA) and the homeowners and small lodging operators we represent across Colorado, we appreciate the opportunity to provide feedback on the proposed short-term rental (STR) ordinance currently under consideration for unincorporated Arapahoe</p>

County. Short-term rentals play an important role in the local economy and provide meaningful benefits to Arapahoe County. Visitors who stay in short-term rentals contribute directly to local tax revenues through lodging taxes and sales taxes on goods and services purchased during their stay. These revenues help support essential county services, infrastructure, and community programs while allowing the county to benefit from tourism and visitor activity without requiring large-scale hotel development. Short-term rentals also create a broad network of economic activity that extends far beyond the property itself. Local property managers, housekeepers, landscapers, maintenance providers, snow removal companies, and other service professionals rely on short-term rental activity for employment and business opportunities. Guests staying in short-term rentals frequently dine at local restaurants, shop at nearby retailers, and utilize local attractions and services. This web of economic activity supports small businesses throughout the community and helps sustain jobs in hospitality, retail, and service sectors. It is also important to recognize that many short-term rental hosts are not large investors but ordinary homeowners using their properties to help manage the costs of homeownership. Teachers, retirees, healthcare workers, and other middle-income residents often rely on occasional rental income to offset mortgage payments, property taxes, insurance, and maintenance costs. In many cases, this supplemental income allows families to remain in

their homes and communities rather than being forced to sell due to rising housing costs. COSTRA supports reasonable regulation that ensures responsible operation, protects neighborhood quality of life, and provides local governments with tools to address legitimate concerns. However, several provisions in the draft ordinance raise significant concerns regarding fairness, enforceability, and unintended impacts on homeowners who rely on short-term rentals to supplement income. We respectfully urge the Board to reconsider several aspects of the proposal before adoption.

1. Primary Resident Requirement Limiting the ability to maintain a short-term rental license solely to homeowners or the primary resident of a property places restrictions on part-time residents such as retirees, teachers, and even medical personnel. It is not practical for a homeowner to list their property for short-term rental when their personal items are in closets and throughout the home without creating multiple locked storage closets and subjecting them to potential losses. Many part-time residents utilize the ability to short-term rent as a way to offset the expenses of owning a home, making it more affordable for them to be a part of the community while also contributing to the local economy by sharing their home with visitors who add to local tax revenues and support nearby businesses. Instead of requiring licensees to be the primary resident of a short-term rental property, some counties in Colorado have established special exceptions to local

licensing requirements so that residents are exempt from license caps or other elements of their individual ordinances. We would encourage amending this residency requirement so that it is available as a special caveat with benefits to locals, rather than a restriction that eliminates the ability for part-time residents to rent their homes.

#### 2. Restrictions on Property Types and Accessory

**Dwelling Units** The ordinance states that properties under nine acres containing an accessory dwelling unit (ADU) would not be eligible for a short-term rental license. This provision is particularly concerning because it effectively prevents many rural and semi-rural property owners from using existing guest houses or secondary structures as short-term rentals. A blanket prohibition does not account for whether the property can safely accommodate guests or whether any actual impacts exist. In many cases, these properties are better suited for short-term rental use than densely located suburban homes.

#### 3. One License Per Parcel

**Limitation** The draft ordinance states that no more than one short-term rental license may be issued per lot or parcel, except in multifamily buildings. This limitation may unintentionally restrict legitimate lodging activity on larger properties where multiple structures already exist.

#### 4. Ownership and Licensing Structure

County staff discussions have also explored limiting licenses to property owners rather than allowing professional operators or business entities to hold licenses. Restricting licenses in this way

raises concerns for many legitimate operators who use common ownership structures such as LLCs for liability protection and property management. These structures are widely used across Colorado real estate and hospitality industries. Prohibiting them does not address operational impacts and may unnecessarily complicate compliance for property owners.

5. Separation and Density Restrictions County staff have also discussed distance buffer requirements between whole-home short-term rentals to prevent clustering. Experience from other Colorado communities shows that spacing requirements often create unintended consequences. They arbitrarily determine which homeowners may participate in short-term rentals, create a first-come, first-served licensing system that permanently excludes neighboring properties, and they invite disputes between neighbors over licensing eligibility. Rather than spacing restrictions, the county should focus on clear operating standards such as occupancy limits, parking requirements, and responsive local contacts.

6. Administrative Burdens and Compliance Costs The proposal includes a licensing system with application and renewal fees and potentially inspections or third-party compliance monitoring. Public information about the proposal references a \$200 application fee and \$350 annual license renewal fee. While licensing systems are common, it is important that the county ensure fees and compliance requirements remain reasonable and

proportional. Additionally, the 15-minute response time for homeowners to assist guests creates undue administrative burden by requiring staff to monitor and review every interaction between homeowners and guests. This would be extremely difficult to enforce without extensive record keeping. We would encourage the county to provide recommendations within their good neighbor policies for things such as response times, but not make them something that must be enforced administratively. Short-term rentals in unincorporated Arapahoe County are not concentrated tourism properties; many are occasional rentals operated by homeowners. Excessive regulatory costs could effectively eliminate responsible operators without meaningfully addressing nuisance properties. A More Balanced Approach COSTRA encourages the Board of County Commissioners to adopt a regulatory framework that focuses on responsible operation rather than prohibitive limitations. Effective STR policy should address nuisance behaviors such as noise, trash, and parking; provide clear and reasonable licensing requirements; protect the property rights of homeowners; and avoid arbitrary restrictions unrelated to measurable impacts. Short-term rentals can coexist successfully within communities throughout Arapahoe County when thoughtful regulations are implemented. We hope the Board of County Commissioners will work collaboratively with stakeholders to create a policy framework that balances community

	<p>concerns with the rights of homeowners.</p> <p>COSTRA stands ready to assist the county in developing solutions that promote responsible short-term rental operations while protecting neighborhood quality of life. Thank you for your consideration. Sincerely, Julia Koster Colorado Short-Term Rental Association (COSTRA) (970) 333-1847</p>
40	<p>I have owned a property since 2015 that has exclusively operated as a lodging-style rental. I appreciate the County's efforts to incorporate a Legacy provision within the proposed regulations. I respectfully urge the County to consider allowing properties with a long-established history of lodging-based use to retain Legacy eligibility upon transfer of ownership. For these properties, the short-term rental use has always been inherent to the property itself and has functioned as a lodging accommodation rather than as an owner-dependent use. Allowing Legacy eligibility to continue with the property would recognize the longstanding operational history of these properties, preserve consistency within the lodging market, and prevent the unintended loss of historically established lodging inventory solely due to a change in ownership.</p> <p>Thank you!</p>
41	<p>I'm real worried about how these rules hit folks down the road. The 500-foot rule and having to live in the house just don't feel right. Folks work hard to buy and take care of their homes — they shouldn't be told they can't rent out their own</p>

	<p>place just 'cause of where it sits. The 500-foot thing especially don't make sense. One person gets approved first, and it blocks their neighbors, even if their houses are the same. Ain't no proof it really fixes noise or parking problems.</p>
42	<p>I support the regulation of short-term rentals and appreciate the County's effort to address community concerns while creating a fair standard. For properties that have operated as lodging-style rentals for many years, I respectfully request the Board to consider how the Legacy provisions apply when ownership changes. Communities that have long operated this way should not be treated the same as properties that have never functioned as short-term rentals. Thank you for your time and consideration. Eyal &amp; Yaeli Tavor</p>
43	<p>I've owned a condo for years, always doing this short-term rental. Additionally, our building are a unique, Mixed-Use, hotel-origin property—not a traditional residential STR community. The changing is very unfair to us. Please consider our situation. Thanks!</p>
44	<p>Dear Commissioners and Planning Staff, I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals. I support responsible regulation of short-term rentals, including licensing, inspections, and local</p>

	<p>contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue. I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully. Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing. Thank you for your consideration. Sincerely, Brian Comerford</p>
45	<p>Dear Commissioners and Planning Staff, I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals. I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue. I respectfully request that the County include</p>

	<p>residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully. Please include this letter in the public record for the Planning Commission hearing on October 21, 2025, and any subsequent BOCC hearing. Thank you for your consideration. Sincerely, Bodhi Comerford</p>
46	<p>I support short-term rentals because they enable homeowners to participate in a form of independent small business. When homeowners are able to rent their properties short-term, they can supplement their income while responsibly managing valuable real estate assets. This model benefits the State and local communities. Short-term rentals generate sales and lodging tax revenue, and licensing fees—if reasonably structured—can provide additional public funding. They also encourage property investment, including second homes, which helps strengthen and stabilize local real estate markets. The revenue generated from these rentals typically circulates back into the local economy through spending on maintenance, services, and tourism. However, proposed restrictions such as a Primary-Residence-Only requirement would effectively disqualify many existing property owners who currently operate lawful short-term rentals. Such a rule would penalize individuals who have already made significant investments in compliance with current regulations and who contribute to the local economy as small</p>

	<p>business operators. Policies that severely limit participation in short-term rentals risk favoring large, national hotel chains at the expense of local homeowners and investors. Thoughtful regulation should protect neighborhoods while preserving the economic opportunity that short-term rentals provide to residents and the broader community.</p>
47	<p>I believe in American entrepreneurship, which is why I support the advantage as a real estate investor in the short-term rental model for bringing wealth to ordinary U.S. families. It is important to offer unencumbered paths to growing wealth with the new innovations in technology that benefit people, not just large corporations and their lobbyists. Please stop the encroachment of these monied interests on an already narrow profit-margin individually-owned sole proprietorship opportunity like that offered through short term rentals and BNBs. We don't need additional taxation on our investments, we need legislative protection against corporate hotel interests actively trying to put a stranglehold on American entrepreneurship and wealth opportunities. If you introduce this short-term rental tax reclassification, it would directly impact the livelihoods of local residents like me who rely on hosting to make ends meet. A significant increase in property taxes would financially burden hosts across the state that cannot afford to pay higher taxes and rely on earned supplemental income. Support Coloradans who are struggling to keep up with the rising costs of</p>

	living by rejecting this massive tax.
48	<p>Short-term rental platforms like Airbnb and VRBO have created a new class of small-scale entrepreneurs: homeowners who operate independent lodging businesses. These individuals are able to supplement their income while maintaining and investing in valuable real estate assets. This activity produces meaningful economic benefits. Short-term rentals generate tax revenue through sales and lodging taxes and may also contribute through licensing programs. They encourage property investment—often in second homes—which supports property values and strengthens local real estate markets. The income earned through short-term rentals is also frequently reinvested locally through property improvements, maintenance, and services, creating a multiplier effect within the community. By contrast, proposed restrictions such as a Primary-Residence-Only requirement would eliminate the ability for many current operators to continue participating in this model. This would disproportionately affect individuals who have already invested significant resources in their properties with the intention of operating responsibly and legally. Limiting short-term rentals in this way may unintentionally shift lodging demand away from local homeowners and toward large national hotel chains.</p> <p>Policymaking in this area should aim to balance neighborhood considerations with the economic opportunity that short-term rentals provide for</p>

	local residents.
49	<p>I support the continued availability of short-term rentals such as Airbnb and VRBO because they allow homeowners to operate small independent businesses while responsibly investing in local real estate. These rentals generate tax revenue through sales and lodging taxes, encourage property investment, and circulate income back into the local economy through maintenance, services, and tourism spending. Restrictions such as a Primary-Residence-Only requirement would disqualify many current operators who have made significant investments to participate in this model legally and responsibly. Limiting short-term rentals in this way risks favoring large hotel chains over local homeowners. I encourage policymakers to pursue balanced regulations that address neighborhood concerns while preserving this important economic opportunity for residents.</p>
50	<p>Short-term rentals through platforms such as Airbnb and VRBO allow ordinary homeowners to operate small independent businesses. For many residents, this model provides a way to responsibly leverage their real estate investments while supplementing household income. These rentals also benefit the broader community. When properly regulated, they generate tax revenue through sales and lodging taxes, and licensing programs can further contribute to public funding. Property owners who participate in this market tend to reinvest their earnings locally—maintaining their homes, hiring service</p>

	<p>providers, and supporting the local economy. In addition, demand for second homes and investment properties helps sustain healthy real estate markets. Proposals such as a Primary-Residence-Only requirement would effectively disqualify many existing short-term rental operators. This would place a significant burden on homeowners who have already made major investments to operate legally and responsibly within the current system. Policies that remove these opportunities from local property owners risk benefiting large hotel chains rather than local residents. A balanced regulatory approach should address community concerns while preserving the ability for homeowners to participate in this emerging small-business sector.</p>
51	<p>I support the continued availability of short-term rentals, such as those offered through Airbnb and VRBO, because they allow ordinary homeowners to operate small independent businesses. For many residents, these rentals provide a practical way to supplement income while responsibly maintaining and investing in valuable real estate assets. Short-term rentals also produce clear economic benefits for our communities. They generate sales and lodging tax revenue, and licensing programs—if implemented reasonably—can further contribute to public funding. In addition, the income generated from these rentals is typically reinvested locally through property maintenance, services, and tourism spending. This activity helps sustain local</p>

	<p>jobs, supports small service providers, and strengthens the surrounding real estate market by encouraging property investment. However, restrictions such as the proposed Primary-Residence-Only requirement would effectively eliminate participation for many existing operators. This would penalize homeowners who have already made substantial investments to operate legally and responsibly within the current framework. Many of these individuals purchased or improved properties in good faith with the expectation that short-term rental use would remain permissible. Policies that severely restrict short-term rentals risk shifting lodging demand away from local homeowners and toward large national hotel chains. A balanced regulatory approach should address legitimate neighborhood concerns while preserving the economic opportunity that short-term rentals provide to local residents and small business owners.</p>
52	<p>I believe in American entrepreneurship, which is why I support the advantage as a real estate investor in the short-term rental model for bringing wealth to ordinary U.S. families. It is important to offer unencumbered paths to growing wealth with the new innovations in technology that benefit people, not just large corporations and their lobbyists. Please stop the encroachment of these monied interests on an already narrow profit-margin individually-owned sole proprietorship opportunity like that offered through short term rentals and BNBS. We don't</p>

	<p>need additional taxation on our investments, we need legislative protection against corporate hotel interests actively trying to put a stranglehold on American entrepreneurship and wealth opportunities.</p>
53	<p>If you introduce this short-term rental tax reclassification, it would directly impact the livelihoods of local residents like me who rely on hosting to make ends meet. A significant increase in property taxes would financially burden hosts across the state that cannot afford to pay higher taxes and rely on earned supplemental income. Support Coloradans who are struggling to keep up with the rising costs of living by rejecting this massive tax.</p>
54	<p>i am in support of short term rentals (like AirBNB, VRBO, etc.) and believe it allows for many "independent businesses" to flourish - meaning, every home owner who is able to take advantage of the model is able to supplement their income with an appreciative real estate asset. when sales taxes are paid, and even if a licensing fee is paid, the the State benefits. the State real estate market sees the uplift of individual home owners investing in second homes, helping to drive and retain value for the localized real estate markets. and it is a desirable alternative to long term rentals because it creates near immediate cash flow that is almost always recaptured in the local markets, further driving growth and paying into the tax systems. conversely, to impose restrictions - such as the the proposed Primary-</p>

	<p>Residence-Only model - would disqualify nearly all existing owners leveraging this business model, and further effectively be punitive to "small business owners" who have made significant investments to be good and legal stewards of the State economy. as a consequence, it feels as though these regulations favor the national Hotel Lobby, rather than local investors.</p>
55	<p>I am an owner at Boston Commons in unincorporated Arapahoe County. Our property was originally The Holtze Hotel before conversion to condominiums, and our governing documents expressly allow nightly and weekly rentals. I support responsible regulation of short-term rentals, including licensing, inspections, and local contact requirements. However, the proposed Primary-Residence-Only model would disqualify nearly all owners from obtaining STR licenses. With only about 7% of our 120 units owner-occupied, this rule would eliminate lawful STR operations, cause severe financial losses, and reduce County lodging-tax revenue. I respectfully request that the County include residential condominium communities like Boston Commons, converted from hotel use, within any Legacy STR licensing provisions, so owners who have historically operated STRs can continue to do so lawfully. Thank you for your consideration. Sincerely, Nisa Nopmongkol</p>
56	<p>Thank you for including the legacy exemption that allows existing STRs to continue operating. I</p>

have a question regarding the 60-day application period for legacy licenses. If my existing STR needs to make minor updates to meet the life safety standards or other requirements of the ordinance, will there be a reasonable period of time allowed to complete those updates after the application is submitted, or does the property need to be fully compliant within the 60-day application window? Our home is well maintained with working smoke and carbon detectors, updated wiring and plumbing, and is structurally sound, but it is an older home. My concern is that we need to do some work such as widening a doorway or making another structural change, it may take longer than 60 days to complete. Would we be given time to bring the home into compliance if needed? Thank you again. We look forward to working with you and getting licensed.