

**The Croatan Civic League
604 Fort Raleigh Drive
Virginia Beach, Virginia 23451
January 10, 2019**

The Virginia Beach City Council
2401 Courthouse Drive
City Hall, Building #1, Room 281
Municipal Center
Virginia Beach, VA 23456

Subject: The Croatan Civic League Position on Short Term Rentals

Dear Mayor Dyer and Council Members,

Among the many issues that you are addressing is the governance of Short Term Rentals. We appreciate the careful deliberations that are taking place as this is a complex issue that directly impacts the residents of Virginia Beach. Like many neighborhoods in the city, we have concerns. The Croatan community is somewhat unique in that we are bounded by Rudee Inlet to the North and Federal and State military facilities to the South. The overall area is relatively small and there is only one access road. While we have several dozen investment and second homes that are rented out, we are predominantly a community with full-time residents.

It is the position of the Croatan Civic League that Short Term Rentals be reasonably restricted in residential zones. We support the September 18, 2018 recommendations of the City Council and urge that these be adopted as soon as possible, with implementation beginning before Memorial Day, May 27th, 2019. The following items are emphasized and particularly important to the Croatan community.

1. Short term rentals are 30 days or less in duration. (Section 111. Definitions)
2. A minimum of one parking space per rental is required...and no on-street parking shall be part of the plan. (Sec. 242.1.1.)
3. Special events of 50 - 100 people maximum require a separate event permit. No more than three events per year allowed. (Sec. 242.1.2.)
4. ~~Trash must be taken care of in accordance with city code. (Sec. 242.1.7.)~~
5. A short term rental shall have no more than one rental contract during any consecutive seven day period. (Sec. 242.1.8.)
6. No amplified sound after 10 PM or before 10 AM. (Sec. 242.1.10)
7. The maximum number of "overnight lodgers" shall be two per bedroom and four additional persons. (Sec. 242.1.11.) Note: a bedroom needs to be defined as a normal sleeping area so that dining rooms and attics, etc. are not counted as rooms.

8. Interconnected smoke detectors, a fire extinguisher and carbon monoxide detectors shall be installed. (Sec. 242.1.14.)

The items that follow are areas where we ask that the Council to consider addressing and changing in the September 18th draft.

1. Section 242.1.3 addresses the requirement for an identified responsible person to address conditions and this responsible must be available within 30 minutes. However, it goes on to say that a "physical response is not required." We strongly believe that this responsible person should respond "on-site." Otherwise, the potential for problems not getting resolved properly is high.
2. A Conditional Use Permit (CUP) should be required prior to any dwelling being placed on the Short Term Rental market. The CUP is administratively renewed every two years.
3. We do not see the need to "grandfather" (Sec. 242.1.13) nor support it, as existing rentals must comply with new CUP. Possibly the fee/hearing for existing Short Term Rentals can be waived, but the application and permit must on file to enforce and renew every two years or whenever properties change hands. This is a fairness, economic, and safety issue.
4. The penalty of revocation of status/use needs more detail. For example, are there fines for repeated violations prior to revocation?

Thank you for your time and attention to this important matter.

Sincerely,



Michael J. Kelly
President, The Croatan Civic League

(M) 703.439.9153