

January 20, 2023

Vera Kalias  
Planner  
City of Milwaukie Planning Department  
6101 S.E. Johnson Creek Blvd.  
Milwaukie, OR 97206

Dear Ms. Kalias,

We are writing you in regards to a property on S.E. 33rd Ave. in Milwaukie, 11611 S.E. 33rd Ave., which has a current application for a variance before the Planning Department by it's owner, to allow the property to be used as a vacation rental. We are neighbors who live on S.E. Wister Street, approximately half a block from this home on S.E. 33rd Ave. 11611 S.E. 33rd Ave. house has been a nuisance house for many years, and we watched the renovation and hoped it would become an owner occupied single family home, not a short-term rental.

We have lived on Wister Street for over 60 years and this neighborhood has always been zoned for single family dwellings, not short-term rentals. We are 100% opposed to this variance and this letter expresses our strongly held view. We know our other neighbors in this neighborhood are also against granting this variance.

Lets be honest, Milwaukie is not a hot vacation destination. And Portland's reputation as a good family vacation destination has gone dramatically downhill in the last three years. Americans are choosing not to come to Portland for vacations due to Portland's abysmal violent crime and homelessness statistics. Businesses and residents are moving out of the Portland area. And Portland consistently gets bad press across the United States and even in London newspapers.

We have an abundance of new apartments being built, therefore, we need to preserve our owner-occupied single family dwellings. Owner occupied homes are the backbone of keeping our neighborhoods livable. Short-term rentals can attract a criminal element in a family-oriented neighborhood like this specific neighborhood. Drug dealers and sex traffickers can hide away in a short-term rental surrounded by family homes—they become inconspicuous hidden away in a family neighborhood where they never belong.

Please deny this variance application. Making this house a commercial property does not comply with the City of Milwaukie's vision statement to protect and keep neighborhoods safe and livable for adults and children.

Best regards,

Julie Wisner and Patty Wisner

# Joan Egloff-Olson

11614 SE 33<sup>rd</sup> Ave.  
Milwaukie, OR 97222  
925.360.6559 | joaneous@gmail.com

Vera Kolas, Senior Planner  
City of Milwaukie Planning Department  
6101 SE Johnson Creek, Blvd.  
Milwaukie, OR 97206

23 January 2023

Dear Ms. Kolas,

As agreed at the last Planning Commission Meeting, a group of neighbors met with the owner's representative of 11611 SE 33<sup>rd</sup> Ave. to present our concerns and ask questions. After attending that meeting, I would like to recommend that the Planning Commission deny the conditional use permit. Here are some of reasons.

- The property representative was unable to provide answers to basic business questions such as what the planned nightly charge for the property is and what the target occupancy in terms of days/year is. This makes me question whether or not there is a business plan for the property and how involved the owner will be in overseeing appropriate use. In looking at a similar Milwaukie vacation property at 12580 SE 23<sup>rd</sup> Ave. charging \$166/night, AirBnb shows that the property is not booked for February, March, April or May thereby making it clear that similar vacation rentals in Milwaukie are not in high demand. Milwaukie is residential; it is not a vacation destination. It seems inappropriate to use the property for a vacation property that will be unoccupied much of the time rather than as a full-time rental or as an owner-occupied residence.
- When asked for 7x24 contact information for the company who will be managing the property (iTrip), the representative said she possibly could provide that information. If the Commission grants the permit, it is essential for the neighbors to have recourse if there are issues. Otherwise, the Milwaukie Police will be called. Their time shouldn't be used to do the job of the management company.
- There was a request for neighbor references for Coast 2 Coast vacation rental properties being managed by iTrip so we could judge how effective they have been in handling issues with other properties. As of this date, no references have been supplied. The representative said they have only one other operating property in Welches with one on the way in Bend. Since the one active venue is a vacation destination, is somewhat isolated and is fairly expensive (\$400/night), it is not a comparable property. Even if we had received references, it doesn't seem as if they would be applicable.
- In doing additional research and speaking with the property representative, we discovered that the property is also on the long-term rental market and that there have been several serious inquiries into the property. In a strictly residential neighborhood in an area with a severe housing shortage, this seems like it would be a better use of property.
- It appears that the minimum amount of work was done to ready the exterior of the property for use. The representative said there was a plan to improve the landscaping but couldn't provide details. This makes us question how well the property will be maintained.

- Because the property is a vacation rental, there isn't any screening of the renters. As a family neighborhood with children, single persons and elderly residents, we are concerned about who might rent the house and how that risk will be mitigated.

Therefore, I request denial of the conditional use permit.

If, however, the Planning Commission decides to grant the request, several conditions to the permit are requested:

- Provide a complaint number that is answered and acted upon 7x24.
- Provide information documenting how iTrip has successfully managed other properties with local references.
- Improve the landscaping and the fences within 6 months of approval.
- Provide detailed information about how the property will be remotely monitored (ie. types of devices, location, software that will be used, how it will be monitored) as well as providing monitoring reports to interested neighbors for one year.
- When/If the property is sold or changes owners, reverse the conditional use permit making it necessary for the new owner to once again apply for a new permit. Change of ownership eliminates any assurance made by the previous owner.

In conclusion, in a city within an area with a severe housing shortage (reference the governor's push to build new housing to fulfill the need), residential properties should not be used as a substitution for hotels. Desperately needed housing should be used for long-term renters or for buyers.

Regards

Joan Egloff-Olson

Cc: Debby Patten, Lake Road NDA

**From:** [Paul Olson](#)  
**To:** [Vera Kolas](#)  
**Subject:** RE: Notice of Public Hearing - CU-2022-006  
**Date:** Monday, January 23, 2023 9:57:57 AM  
**Attachments:** [We sent you safe versions of your files.msg](#)  
[CU-2022-006.pdf](#)

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Paul E. Olson

11614 SE 33rd Ave.  
Milwaukie, OR 97222  
925.550.4420 | [peo@peo-jeo.com](mailto:peo@peo-jeo.com)

Vera Kolas, Senior Planner  
City of Milwaukie Planning Department  
6101 SE Johnson Creek Blvd,  
Milwaukie, OR 97206

January 23, 2023

RE: Notice of Public Hearing - CU-2022-006

My name is Paul E. Olson. I reside at 11614 SE 33rd Ave.; directly across the street from the property variance being considered.

I am opposed to the approval of CU-2022-006. This would create a "Conditional Use for a Vacation Rental" in the Lake Road Neighborhood, currently zoned R-MD. This allows for the use of the property as a full-time vacation rental when there is no primary resident.

The Milwaukie Housing Affordability Strategy was adopted in July 2018. It sets out three goals to be obtained over 5 years by 2023.

***Goal 1: Develop New Units***

*Increase the amount of housing affordable to people across the income spectrum. Increase the number of affordable units and the total amount of housing to better meet market demand through financing and direct development.*

***Goal 2: Prevent Displacement and Keep Affordable Units Affordable***

*Stabilize and protect renters and homeowners by preserving existing affordable housing and increasing education and access to resources.*

**Goal 3: Connect People to Existing Affordable Housing**

*Help existing and potential residents find, qualify for, and access housing that is affordable and appropriate for their needs.*

Approval of this variance would do nothing to help achieve these goals. In fact, they make the situation worse by potentially removing housing inventory from the properties that are currently ready and available. Even if the property is rented/leased to a full-time resident, the proposed rental price given by the property owner on Zillow is \$3,295/month. It is hardly affordable and is overpriced for the immediate neighborhood.

Thank you for your consideration in this matter and I urge you to deny the variance request.

Paul E. Olson

## Paul E. Olson

11614 SE 33rd Ave.  
Milwaukie, OR 97222  
925.550.4420 | [peo@peo-jeo.com](mailto:peo@peo-jeo.com)

Vera Kolas, Senior Planner  
City of Milwaukie Planning Department  
6101 SE Johnson Creek Blvd,  
Milwaukie, OR 97206

January 23, 2023

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<sup>1</sup> <https://www.milwaukieoregon.gov/housingaffordability/milwaukie-housing-affordability-strategy>

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Thank you for your consideration in this matter and I urge you to deny the variance request.

Paul E. Olson

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<sup>2</sup> [https://www.zillow.com/homes/11611-SE-33rd-Ave-Milwaukie,-OR-97222\\_rb/48211623\\_zpid/](https://www.zillow.com/homes/11611-SE-33rd-Ave-Milwaukie,-OR-97222_rb/48211623_zpid/)

January 24, 2023

City of Milwaukie  
6101 SE Johnson Creek Blvd.  
Milwaukie, OR 97206

RE: Open Record Submittal for the City of Milwaukie File No. CU-2022-006

Dear Planning Commission,

This letter is submitted in opposition to the proposed vacation rental at 11611 SE 33<sup>rd</sup> Ave, Milwaukie, Oregon (the "subject property"). I live cattycorner to the subject property. My address 11562 SE 33<sup>rd</sup> Ave. While I submit this letter in my individual capacity, this letter raises significant concerns held by myself and other neighbors. Some of these concerns were specifically raised by myself and others during the January 19, 2023 meeting with the Applicant at the Milwaukie Library (the "Neighborhood Meeting"). Please include this letter in the record for the above-referenced file.

Under Milwaukie Municipal Code ("MMC") a conditional use are uses that are not allowed outright and are only to be approved if the application is able to establish that the under MMC 19.905.4 are or can be met. This is a burden placed on the applicant to prove. Here the applicant has submitted an application that is full of bald assertions that they are capable of meeting these required criteria without any evidence to support these claims. The applicant has not met its burden here and the Planning Commission should deny this application.

- I. Evidence does not support the finding that the proposed use will comply with MMC 19.905.4 and 19.905.9.H.

As mentioned above on January 19, 2023, at the direction of the Planning Commission, a number of concerned neighbors met with the Applicant at the Milwaukie Library. A number of concerns were raised. These concerns and others are presented here. While it is true that the Applicant did respond to some of the concerns raised by the neighbors during this meeting. However, much of their responses are not found within the application materials and therefore these responses are not binding on the Applicant or this application.

- a. Noise and Privacy

There is significant concern regarding noise emanating from the subject property as a result of the constant flow of guests. While it is true that the application notes that the property will be monitored by iTrip using software to detect noise and occupancy levels. However, there is no indication on how quickly iTrip will respond to rowdy guests or if their responses will even be complied with. At present the neighbors do not have iTrip's 24 hour customer service line which would allow the neighbors to report when guests of the subject property are not following house rule and causing noise disturbances. This leaves the Milwaukie Police Department as neighbors only recourse for noise complaints. The Applicant did indicate during the Neighborhood Meeting



that it could be possible for the neighbors to have iTrips 24 hour line but to date neighbors do not have this information.

There is also concern regarding negative impacts due to loss of privacy and noise because the subject property is not fully fenced. The backyard is not fully fenced and the two adjacent properties to the subject property only have short chain link fencing separating their yards. During the Neighborhood Meeting concerns were raised regarding the loss of privacy to these neighbors and the possible noise emanating from the backyard if the fencing is maintained as is. The Applicant indicates they are working on fully fencing the backyard. However, again this information is not present within the application materials and neighbors are just left to take the Applicant's word that the backyard will be fully fenced to provide the neighbor will privacy and noise mitigation. The impacts of noise and loss of privacy has not been adequately addressed by this application. This application should be denied.

#### b. Crime

Research indicates that vacation rentals, like the one proposed at the subject property, are linked to an increase in crime and violence. *See* Attachment 1 and Attachment 2. This is a significant concern. There does not appear to be any sort of background check measure to ensure the safety of the neighborhood and the neighbors of the subject property. This would not be the case if the subject property were to be used as a long-term rental as it is typical for tenants to undergo background checks during the course of landlords review of potential tenants' applications. The Applicant has offered nothing to mitigate these concerns and impacts during the Neighborhood Meeting or within the application materials submitted. This application does not comply with the approval criteria and should be denied.

#### c. ADA Compliance

There is evidence that the proposed vacation rental would fall under the Americans With Disabilities Act ("ADA") regulations. Attachment 3 and Attachment 4. The propose use should be considered a "public accommodation" under the ADA. Under Title 42 §12181(7)(A) a public accommodation is defined as "an inn, hotel, motel, or other place of lodging, **except** for an establishment located within a building that contains not more than five rooms for rent or hire **and** that is actually occupied by the proprietor of such establishment as the residence of such proprietor." (emphasis added). Under MMC 19.201 a vacation rental is defined as "a housing unit that is rented out to a single party for a period of less than 30 days in length where there are no primary occupants or where the residents who occupy the unit do so for less than 270 days per year. A vacation rental is considered **a form of commercial lodging**. It is a primary use and is more commercial in nature than a short-term rental." (emphasis added). As a form of commercial lodging the vacation rental fall under the definition of public accommodation and thus is regulated by the ADA. The except to the definition does not apply here as the Applicant has stated in their application there will be no primary residents and they will not reside at the subject property.

There is no evidence to show the subject property or the proposed use is ADA compliant. Without ADA compliance, the proposed use will be inconsistent with Goal 7.1 of the City of Milwaukie Comprehensive Plan generally and policy 7.1.5 specifically. Goal 7.1 calls for the City

of Milwaukie (the “City”) to “enable and encourage housing options that meet the needs of all residents, with a specific focus on uplifting historically disenfranchised communities and eliminating disparities for populations with special needs or lowers incomes” and policy 7.1.5 calls on the City to “encourage development of new homes ad modification of existing homes to accommodate people of all ages and abilities through the use of universal design.” Without compliance of the ADA, this proposed use will act as a barrier to fair accommodations to those with disabilities. The application provided no evidence that the vacation rental was built using universal design or is ADA compliant therefore the Planning Commission should deny this application.

#### d. Loss of Housing

Affordable housing and homelessness have been a consistent problem in the United States, our state, the greater metropolitan area, and right here in Milwaukie. This is an issue many representatives of our state and our city ran on addressing. Significant evidence shows short term vacation rental, such as the proposed use, is contributing to this crisis. See Attachment 5. These short term vacation rentals remove residential units and convert them in to added hotel units. This limits supply and increase demand. Limiting the ability of moderate and low income families to own or rent a home or an apartment. According to the 2019 Homeless Point-In-Time Count of Clackamas County, the leading reason for homelessness is the inability to afford rent. See Attachment 6. It is understood this is only one home but each loss of a home to vacation rental compounds this housing crisis. How many more vacation rental can there be in the City until their negative impact on housing availability and long term affordability becomes irreparable?

## II. Conclusion

Based on the foregoing I respectfully request the Planning Commission deny the proposed use because the Applicant has failed to meet their burden.

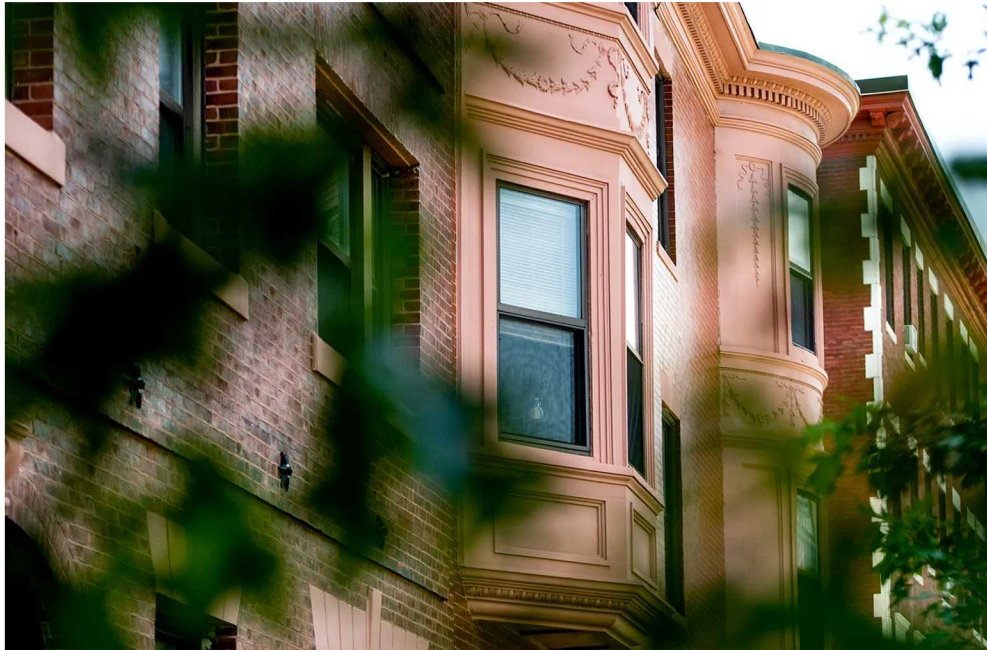
Stephen Thorpe



## When Airbnbs increase in a neighborhood, so does crime. Here's why.

by Molly Callahan  
July 16, 2021

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A proliferation of Airbnbs, or similar short-term rentals, in a neighborhood contributes to higher rates of crime in the area, according to a new study by two Northeastern researchers. Photo by Matthew Modoono/Northeastern University

A proliferation of Airbnbs, or similar short-term rentals, in a neighborhood contributes to higher rates of crime in the area, according to a new study by two Northeastern researchers.

The relationship is likely because the highly transient housing “pokes holes in the social fabric of the neighborhood,” says [Dan O’Brien](#), associate professor of public policy and urban affairs who, with his colleague [Babak Heydari](#), associate professor of engineering, recently [published a comprehensive study](#) of Airbnb listings and crime rates in neighborhoods throughout Boston.

They found that it was the proportion of buildings with at least one home-sharing listing—and not the volume of tourists cycling through such units—that had the greatest (indeed, only) measurable effect on crime in the neighborhood. Their research was published Wednesday in *PLOS One*, a peer-reviewed scientific journal published by the Public Library of Science.

“What seems to be the problem is that Airbnb is taking households off the social network of the neighborhood and eroding its natural capacity to manage crime,” says O’Brien, who also studies criminology and criminal justice at Northeastern.



mechanical and industrial engineering in the College of Engineering, and one of the authors of a new paper linking the increased presence of Airbnb  
/odoono/Northeastern University

The researchers hope their study can help guide local and regional policy decisions about short-term rental regulations.

O'Brien and Heydari compiled 911-call data and Airbnb listings and reviews from 2011 to 2018, a period of rising concern about crime and during which listings on the online home-sharing platform more than doubled in Boston. They found that certain violent crimes, including fights, robberies, and reports of someone wielding a knife, tended to increase in a neighborhood a year or more after the number of Airbnbs increased.

[How to rebound from disasters? Resilience starts in the neighborhood](#)  
[read more](#)

The lag, Heydari says, is evidence that it's not the immediate presence of rowdy tourists or criminals taking advantage of newcomers that's driving an increase in crime. Such effects would be seen in the same year that listings increased, not afterward.

"What we're seeing is evidence of a slower process, one that becomes significant over the years," he says. "It's another support that changing the social fabric of the neighborhood is what's undergirding these results."

In reply to a request for comment, a spokesperson for Airbnb referred a *News@Northeastern* reporter to a written response [posted to the company's website](#). The missive takes issue with the study's methodology and conclusions and questions whether the researchers controlled for other factors such as new housing construction and other economic conditions.



Daniel O'Brien is an associate professor of public policy and urban affairs and criminology and criminal justice in the College of Social Sciences and Area Research Initiative. Photo by Adam Glanzman/Northeastern University

To measure the presence of Airbnb in the city, O'Brien and Heydari used a combination of geographic available data scraped from website listings and the "host since" feature on the company's website, which logs the year a host joins the site. They organized the data by longitude and latitude and matched it with census tracts to approximate neighborhoods in the city.

This gave the researchers a sense of the number of Airbnb units per neighborhood, but not how they were distributed—after all, a dozen units contained to one condominium complex

may have a different overall effect than a dozen units in a dozen different houses along a street.

In order to determine this distribution, which they describe as the penetration of Airbnb units in each neighborhood, the researchers divided the number of unique addresses with listings by the number of parcels in the census tract. The calculation resulted in an approximate measure of the proportion of buildings with at least one listing.

Algorithms can lead to more efficient public transit. Here's how you may already be helping.

Heydari and O'Brien relied on data about when a user "joined" Airbnb because the platform does not make more specific data available, but the researchers acknowledge that their proxy isn't always a perfect representation of when units cropped up in buildings.

"This serves to highlight the need for Airbnb—and other social networks and web platforms—to be more transparent in their data," Heydari says.

The researchers also accounted for other, unrelated changes to the neighborhoods that might have had an effect on crime rates, including rental transience and sociodemographic changes, Heydari says.

And while their data are limited to Boston, the motivating theory that a community of neighbors who all know and look out for each other is a strong crime deterrent is one that can be translated to cities and communities across the country, the researchers say.

"What we're showing here is that when we tease out the other factors, we see that the penetration of Airbnb has a role in a gradual increase in crime," Heydari says. "That effect is not specific to Boston, although other cities and neighborhoods may contain factors that change the degree to which it presents."

*For media inquiries, please contact Jessica Hair at [j.hair@northeastern.edu](mailto:j.hair@northeastern.edu) or 617-373-5718.*

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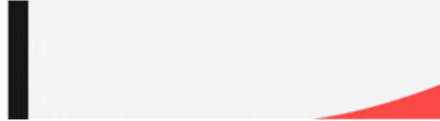


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Airbnb listings have been linked to increased rates of violence by a recent study [Credit: Airbnb]

News Supplier

## Study links Airbnb listings to increased rates of violence

16th July 2021 Paul Stevens Airbnb, Babak Heydari, Barcelona, Boston, Northeastern University

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US: New research published this week has suggested that the presence of Airbnb listings in neighbourhoods is leading to an increase in violent crimes being committed over time.

The peer-reviewed study, published in the journal PLOS ONE and conducted by Northeastern University in Boston, USA, analysed the veracity of news reports linking short-term rental platforms such as Airbnb with violent crime, using data gathered between 2011 and 2017.

The researchers found that the greater the number of Airbnb listings there were in any given neighbourhood, the higher the rates of violence there were in that neighbourhood, however, the link only developed at a gradual rate, suggesting that tourists were not typically the perpetrators of the crimes themselves, such as public social disorder or private conflicts.

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Instead, they observed that social dynamics may have been “eroded” when housing units were being converted into short-term rentals, due to the fact that home-sharing platforms “remove social capital from the neighbourhood in the form of stable households, weakening the associated community dynamics”, according to the study.

One of the authors of the report, Professor Babak Heydari, accepted its limitations, such as the fact that the study was only conducted in Boston, however he added that the eventual goal was to understand if these findings were reflective of the situation in other cities around the world too.

Professor Heydari told Sky News: “We show that it’s not the number of Airbnb tourists who stay in a neighbourhood that causes increase in criminal activities, but it’s the creation of transient properties spread throughout a neighbourhood that undermines social organisation and social capital and over time and can cause disorder and criminal activities as a result.

“This paper is one of the first papers that measures the causal social impact of sharing platforms at neighbourhood level for short-term rental platforms and quantifies the causal effect of short-term rentals on criminal activities and disorders in neighbourhoods.

“More importantly, this paper identifies the mechanism behind such effects. Identifying causal mechanism is for more effective governance of these platforms, either through government regulations or via designing self-regulating mechanism by platforms themselves,” he added.

Following the publication of the study, Airbnb countered the findings in a [blog post](#): “Over the last year-plus, various reports indicate the unfortunate trend that crime has risen in many American cities [even as travel and tourism, including short-term rentals, have suffered in urban markets]. There are many complex issues that contribute to rises and falls in crime rates that require serious research to help inform and guide public policy work.

“As a society, we should be working to advance serious research. In this context, Airbnb will be formally reaching out to Northeastern University to express our concerns about the lack of academic rigour in this paper and learn more about the protocols the University applies to assure the quality of the research performed by those associated with the school.

“While the approach taken by these authors resulted in conclusions not supported by the facts or the methodology, we continue to welcome the opportunity to work with those who want to approach these important issues with a seriousness of purpose,” it concluded.

It comes as reports emerged of an American student, Victoria Yordanova, suing Airbnb after she was attacked and left injured during a stay at a property listed on the platform in Barcelona. Yordanova, a student at Simmons University in Boston but currently studying in Dublin, suffered two neck fractures and a broken arm three years ago in what was described as an attempted abduction, according to *The Times*.

Meanwhile in June, it was revealed that Airbnb had been [spending approximately \\$50 million a year](#) to keep serious incidents in its rentals out of the press through the use of a “black box” team. The cash, coming in the form of blank checks, had been given to both hosts and guests so that they would not “imply responsibility or liability” on the company, which went [public in December](#).

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## The Applicability of the Americans with Disability Act to Short Term Rental Facilities

Written by: Natalie Klyashtorny

The Covid-19 Pandemic has changed our world as we know it. One of the most significant changes has been the prevalence of remote work, a trend that many agree will become a permanent part of our lives long after the pandemic has (hopefully) ended.

The acceptance of remote work and the increased concern for safety and privacy as a result of the pandemic has been a boon for the short-term rental industry. With many people now having the flexibility to work while spending months at a time away from their primary residence, expect the short-term rental industry to continue growing.

This article will discuss the potential obligations of operators of short-term rental facilities under the Americans With Disabilities Act (ADA) and the potential impact on landlords who lease to those operators. Any landlord who leases a building or part of a building to an operator of a short-term rental facility needs to be familiar with the ADA accessibility requirements, especially for older buildings that were built prior to the ADA's enactment.

Title III of the ADA prohibits discrimination on the basis of disability in activities or places of public accommodation and requires newly constructed or altered places of public accommodation—as well as commercial facilities—to comply with the ADA Standards (1).

Importantly for landlords, the ADA regulations hold the landlord who owns a building that houses a place of public accommodation and the tenant who leases the building and operates a place of public accommodation equally responsible for complying with the ADA (2). However, "allocation of responsibility for complying with the obligations ... may be determined by lease or other contract." (3) As such, leases with operators of short-term rental facilities must be drafted with the ADA requirements in mind.

The initial question is whether a short-term rental would be considered a "place of public accommodation." The Code of Federal Regulations defines a "place of public accommodation" as a facility operated by a private entity whose operations affect commerce and fall within at least one of twelve categories. (4) One of the twelve categories is a "place of lodging" which is defined as:

An inn, hotel, or motel; or

A facility that –

- Provides guest rooms for sleeping for stays that primarily are short-term in nature (generally 30 days or less) where the occupant does not have the right to return to a specific room or unit after the conclusion of his or her stay; and
- Provides guest rooms under conditions and with amenities similar to a hotel, motel, or inn, including the following —
  - On- or off-site management and reservations service;
  - Rooms available on a walk-up or call-in basis;
  - Availability of housekeeping or linen service; and
  - Acceptance of reservations for a guest room type without guaranteeing a particular unit or room until check-in, and without a prior lease or security deposit (5).

As such, if the short-term rental provides "guest rooms for sleeping" for short-term stays where the occupant does not have the right to return after the conclusion of his or her stay and offers hotel-like conditions or amenities such as the ones described above, it could qualify as a "place of public accommodation" to which the ADA applies.

The regulation does provide an exception for "an establishment located within a facility that contains not more than five rooms for rent or hire and that actually is occupied by the proprietor of the establishment as the residence of the proprietor." Thus, a short-term rental is not required to be ADA compliant if it does not contain more than five rooms for rent and is occupied by the owner of the establishment as his residence. If the short-term rental is not owner-occupied or there are more than five rooms, the aforementioned analysis must be applied to determine if the short-term rental would be considered a place of lodging subject to the ADA.

The ADA requirement to make the facility accessible is dependent upon whether the short-term rental is located within a new construction or an existing facility. A new construction must be ADA-accessible. An existing building is required to remove architectural barriers, including communication barriers that are structural in nature, where such removal is readily achievable, i.e., easily accomplishable and able to be carried out without much difficulty or expense (6).

Section 36.304(b) provides examples of steps to remove barriers which include, but are not limited to, the following actions:

- Installing ramps;
- Making curb cuts in sidewalks and entrances;
- Repositioning shelves;
- Rearranging tables, chairs, vending machines, display racks, and other furniture;
- Repositioning telephones;
- Adding raised markings on elevator control buttons;
- Installing flashing alarm lights;
- Widening doors;
- Installing offset hinges to widen doorways;
- Eliminating a turnstile or providing an alternative accessible path;
- Installing accessible door hardware;
- Installing grab bars in toilet stalls;
- Rearranging toilet partitions to increase maneuvering space;
- Insulating lavatory pipes under sinks to prevent burns;
- Installing a raised toilet seat;
- Installing a full-length bathroom mirror;
- Repositioning the paper towel dispenser in a bathroom;
- Creating designated accessible parking spaces;
- Installing an accessible paper cup dispenser at an existing inaccessible water fountain;
- Removing high pile, low-density carpeting; or

- Installing vehicle hand controls.

The aforementioned is not an exhaustive list of potential barrier removals that might be required. The Department of Justice website has a *Checklist for Readily Achievable Barrier Removal* which is intended to be used when surveying an existing facility for barriers to accessibility (7). It is organized by the priorities stated in the regulations and includes possible solutions to accessibility barriers.

Furthermore, under the ADA Accessibility Standards issued by the Department of Justice and the Department of Transportation, the requirement of accessibility applied to new construction is triggered whenever there is an "addition" or "alteration" to an existing building. An "addition" is defined as "[a]n expansion, extension, or increase in the gross floor area or height of a building or facility."<sup>(8)</sup>

An "alteration" is defined as "[a] change to a building or facility that affects or could affect the usability of the building or facility or portion thereof."<sup>(9)</sup> The definition of alteration is broad and could potentially include remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of the structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Where compliance with applicable requirements is technically infeasible, the alteration shall comply with the requirements to the maximum extent feasible. Normal maintenance, reroofing, painting or wallpapering, or changes to mechanical and electrical systems are not alterations unless they affect the usability of the building or facility.

In addition to potential structural modifications, Section 36.302(e)(1) requires a public accommodation that owns, leases (or leases to), or operates a place of lodging to (i) modify its policies, practices, or procedures to ensure that individuals with disabilities can make reservations for accessible guest rooms in the same manner as individuals who do not need accessible rooms and to identify and (ii) describe the accessible features in the hotels and guest rooms offered through its reservations service in enough detail to reasonably permit individuals with disabilities to assess independently whether a given hotel or guest room meets his or her accessibility needs.

Additionally, Section 36.302(e)(1)(iii) requires a public accommodation to ensure that accessible guest rooms are held for use by individuals with disabilities until all other guest rooms of that type have been rented and the accessible room requested is the only remaining room of that type and to guarantee specific accessible guest rooms that are reserved through a reservations service to the same extent that it guarantees rooms that are not accessible.

When a public accommodation does guarantee room reservations, it must provide the same guarantee for accessible guest rooms as it makes for other rooms, except that it must apply that guarantee to the specific room reserved and blocked, even if in other situations, its guarantee policy only guarantees that a room of a specific type will be available at the guaranteed price (10).

Taking into account these requirements, a lease between a landlord and the operator of a short-term rental facility that could qualify as a place of public accommodation must be carefully drafted to knowingly allocate responsibility for ADA compliance.

An attorney representing a landlord should seek the best terms possible to place responsibility upon the tenant-operator for removing architectural barriers and making the building otherwise accessible if the building has been, or will be, altered or expanded. Likewise, it would be important to include provisions in the lease, making the tenant-operator explicitly responsible for the contents of any advertisements of the short-term rental, including advertisement on social media and third-party platforms such as Travelocity, Airbnb, and Orbitz, and for making accessible rooms available to the disabled in a non-discriminatory manner.

Conversely, an attorney representing the tenant-operator should attempt to place as much responsibility upon the landlord for making structural repairs to remove architectural barriers and making the building otherwise accessible if the building has been, or will be, altered or expanded.

As people continue to utilize short-term rentals in greater numbers, we will inevitably see additional guidance from the courts as to the application of the ADA to such short-term rentals.

#### Notes

(1) 42 U.S. Code § 12182.

(2) See 28 CFR § 36.201(b).

(3) Id.

(4) 28 CFR § 36.104.

(5) Id.

(6) See 28 CFR § 36.304(a).

(7) Checklist for Readily Achievable Barrier Removal, Information and Technical Assistance on the Americans with Disabilities Act, available at <https://www.ada.gov/checkweb.htm>

(8) U.S. Dept. of Justice 2010 ADA Standards for Accessible Design, § 202.2, available at <http://www.ada.gov/regs2010/2010ADAStandards/2010ADAStandards.pdf>.

(9) Id. at §202.3

(10) 28 CFR § 36.302(e)(1)(v).

— *Clementa Amazan*, an associate attorney at Nochumson P.C., performed the legal research for this article.

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Potter Handy, LLP > > Blog > > Consumer Rights > > Vacation Rentals, Opportunities for Accommodations but Great Risk for Barriers to Access. What is the Law?

## VACATION RENTALS, OPPORTUNITIES FOR ACCOMMODATIONS BUT GREAT RISK FOR BARRIERS TO ACCESS. WHAT IS THE LAW?

POSTED BY POTTERHANDY, LLP ON DECEMBER 22, 2015 WITH 1 COMMENT

By Mark Potter

Vacation rentals typically consist of regular housing units that are rented on a short-term basis (less than a month). Before the Internet existed, vacation rentals were mostly rented by property managers specializing in short-term rentals — and in areas that were in high demand for family vacations such as snow ski and beach areas. The Internet and the “sharing economy” changed all



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for larger groups because they can all stay and hang out in a house or apartment where they'll be able to use the kitchen and other rooms, for example. Unfortunately, vacation rentals are overwhelmingly inaccessible, falling well short of the requirements found in the ADAAG standards. In addition to having the same needs as anyone else utilizing a vacation rental, persons with disabilities are more likely to be traveling with an attendant who would also benefit from having more rooms than offered in a typical motel.

The question remains, though: Do vacation rentals have to be accessible? The quick answer is yes. The ADA applies to vacation rentals — just as it does to hotels or any other short-term rental facility. As with any business open to the public that existed before the ADA's implementation, vacation rentals must be compliant with the ADA so long as it is "readily achievable." To determine if it is readily achievable, one compares the cost of compliance with the financial wherewithal of the responsible parties. There is no set formula to determine readily achievable. Indeed, there are a number of factors that go into determining whether something is readily achievable.

If you have had problems renting an accessible vacation rental, please call us at 800-383-7027. We will explore whether your civil rights have been violated and whether we are able to help. There are no out-of-pocket expenses for our clients.

 CONSUMER RIGHTS



WRITTEN BY POTTERHANDY, LLP

### **ONE THOUGHT ON “VACATION RENTALS, OPPORTUNITIES FOR ACCOMMODATIONS BUT GREAT RISK FOR BARRIERS TO ACCESS. WHAT IS THE LAW?”**



AVA IVY NOVEMBER 23, 2021 / REPLY

My husband is a 100% disabled veteran, and I rented a condo on Airbnb. The owner did not disclose that the unit was not accessible on his listing. There were approximately thirty stairs to get to the unit. My husband was unable to access those stairs. I was forced to look for alternative lodging for us for our



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Hi there, have a question? Text us here.

Attachment 4

 Text Us

# Are Short-term Vacation Rentals Contributing to the Housing Crisis?



The rise and growth of short-term rental platforms such as Airbnb, HomeAway and Flipkey has created plenty of debate amongst local governments, the hotel industry, the real estate lobby, housing activists and local residents about the impact of such rentals on the availability of affordability of long-term rental housing.

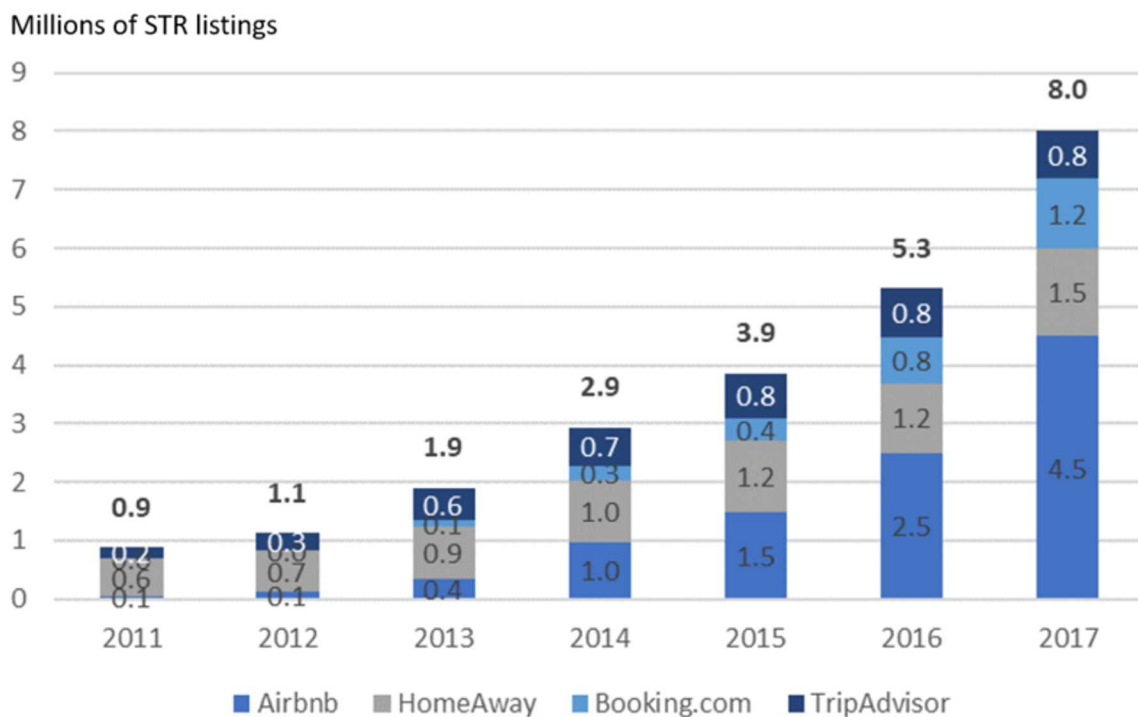
According to a **recent article in the Harvard Law & Policy Review** the theory goes as follows: short-term rentals “reduces the affordable housing supply by distorting the housing market in two interconnected mechanisms. The first such mechanism is one of simple conversion: any housing unit that was previously occupied by a city resident, but is now listed on Airbnb year round, is a unit that has been removed from the rental market and has essentially been added to [the community’s] supply of hotel rooms. This leads to a real, but likely mild, increase in rents, an effect that is concentrated in affluent or

gentrifying neighborhoods along the [community's] central core. More disconcertingly, conversion reduces [the community's] already-limited supply of affordable housing. The second mechanism is "hotelization." So long as a property owner or leaseholder can rent out a room on Airbnb for cheaper than the price of a hotel room, while earning a substantial premium over the residential market or rent-controlled rent, there is an overpowering incentive to list each unit in a building on Airbnb rather than rent to [local] residents, thereby creating "cottage hotels." This decreases the supply of housing and spurs displacement, gentrification, and segregation.

While still a theory, more and more evidence is suggesting that these effects are in-fact real. As an example, a **2016 study from the University of Massachusetts** concluded that in Boston, MA "home sharing is increasing rents by decreasing the supply of units available to potential residents [and] that a one standard deviation increase in Airbnb listings relative to the total number of housing units in a census tract is associated with an increase in asking rents of 0.4%. For those census tracts in the highest decile of Airbnb listings relative to total housing units, this increase in asking rents ranges from 1.3% to 3.1%, which equates at the citywide mean monthly asking rent to an increase of as much as \$93."

This conclusion is consistent with other independent academic studies which like this **recent paper published by researchers at the National Bureau of Economic Research, the University of California, Los Angeles (UCLA) and the University of Southern California** concluded that on a national basis "a 10% increase in Airbnb listings leads to a 0.42% increase in rents and a 0.76% increase in house prices. Moreover, we find that the effect of Airbnb is smaller in zipcodes with a larger share of owner-occupiers, a result consistent with absentee landlords taking their homes away from the long-term rental market and listing them on Airbnb."

Given that the short-term rental industry has grown by 800% since 2011, it is therefore not hard to see why many people are concerned about this industry’s impact on the affordability and availability of long-term rental housing. Just think about, if a 10% increase in the number of short-term rental listings was found to lead to a 0.42% increase in rents, the actual 800% increase in short-term rental listing since 2011, would be responsible for a 33.6% rent increase over that same time period! For comparison **the median household income in the U.S. grew only 18.0% between 2011 and 2016.**



Sources: AirBnB, Expedia, TripAdvisor and Booking.com

It is also important to acknowledge that this is not just a big city problem. The study from the National Bureau of Economic Research, UCLA and the University of Southern California was based on national data and controlled for unobserved zipcode-specific, time-varying factors that could have otherwise skewed their conclusions. Said simply, their conclusion are universally applicable and also apply to in smaller communities like **Madison**, WI and **Long Beach**, CA where the debate about housing affordability and the impact of short-term rentals has taken center-stage in recent years.

To conclude, recent academic research seems to justify that citizens and local politicians have good reasons to be concerned about the impact of short-term rentals on housing affordability. The good news is that these problems can easily be mitigated by adopting best practice regulations for short-term rentals.

## Granicus Can Help

Host Compliance helps local governments draft, implement, monitor and enforce fair and effective short-term rental regulations. By working with us, our partner municipalities get:

- Enforceable regulatory frameworks that simultaneously protects citizens' property rights and the rights of the neighbors
- A dramatic reduction in noise, parking and trash complaints related to short-term renters
- Improved finances resulting from higher Transient Occupancy Tax (TOT) / Hotel / Bed Tax collections and permit fees
- Fair, continuous and consistent compliance monitoring and enforcement across 50+ short-term rental platforms (Airbnb, VRBO, HomeAway, FlipKey and dozens of others)
- A dedicated 24/7 hotline for neighbors to report problems
- State-of-the-art reporting and analytics

To learn more and get a complementary analysis of the short-term rental market in your area, please contact us so we can get you the data you need to take the appropriate actions needed to ensure that the sharing economy works for everyone in your community.

# 2019 Homeless Point-In-Time Count

## Clackamas County | August 2019



Every two years, Clackamas County conducts a Point-In-Time (PIT) Homeless Count to obtain information about people and families experiencing homelessness. The count, which last took place in 2017, includes persons who are sheltered within homeless assistance programs, living outdoors, in vehicles or other places not meant for people to live as well as people without a permanent home.

The 2019 count took place on the night of January 22, 2019. The count data is a requirement for Clackamas County to receive federal funding, raises public awareness about homelessness, and improves our understanding of the specific service and resource needs for this population.

The 2019 PIT Count was a community effort which included volunteers (168), Clackamas County staff, and 43 of our community partners. People were surveyed at 62 sites, including food pantries, faith-based organizations, agency waiting rooms, shelters, schools, and outdoor areas.

Caution should be taken in relying solely on PIT data to identify trends in the number of people experiencing homelessness in our community. Many factors impact the results of a Point-in-Time Count, including count methodology, volunteer availability, agency staff involvement, and winter weather.

### Data Summary

The number of people counted who are experiencing homelessness in Clackamas County remains at emergency levels. In total, 1,166 people experiencing homelessness were counted in 2019, a 9 percent increase from the 1,068 who were counted in 2017. There was a 54 percent increase in the number of people identified as Chronically Homeless. 869 of the people counted are single adults, a 48 percent increase in the number of single adults counted in 2017.

### Total Homeless Count



### Households

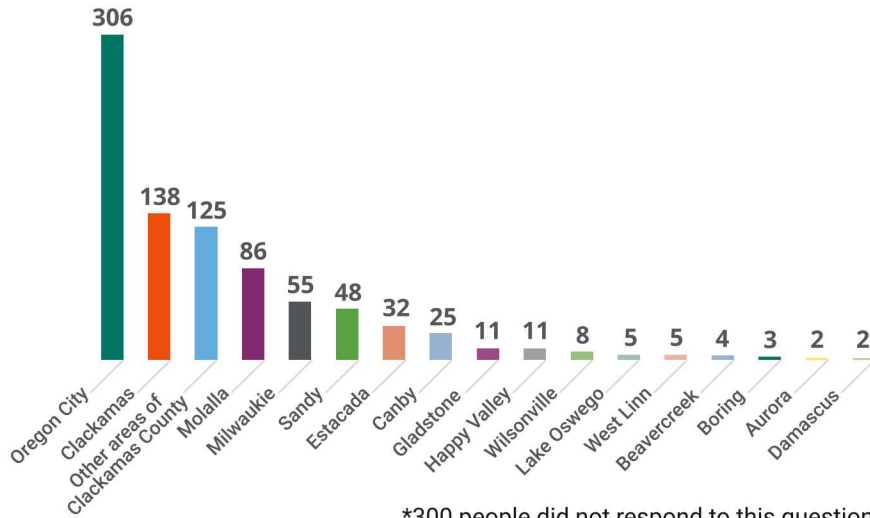


- **75%** Single Adults (869)
- **15%** Adult(s) with children (171)
- **10%** Adults, no children (113)
- **<1%** No household data available (8)
- **<1%** Unaccompanied children (5)

### Chronically Homeless



### City or Area of the County\*

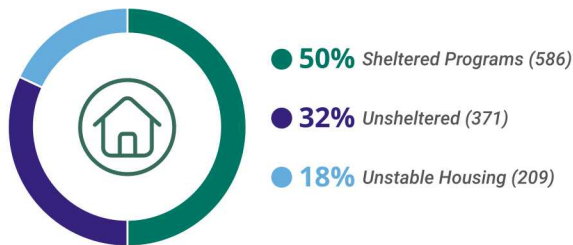


\*300 people did not respond to this question.

Despite historic investments by the State and County in housing and homeless services, along with continued federal investments, there has been a steady increase in the number of people experiencing homelessness since 2013.

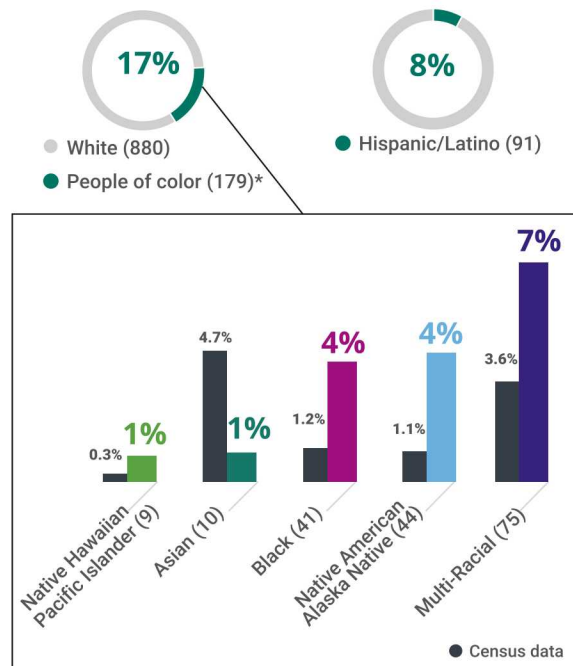
The majority of those surveyed have lived in Clackamas County for two or more years and primarily live in Oregon City, Clackamas, Molalla, Milwaukie, Sandy, Estacada, or Canby.

### Shelter Status



Of those surveyed, almost one-third were unsheltered. This is a significant decrease from 2017, likely because Clackamas County operated significantly more winter shelter beds during 2018-19. A large number of those who were surveyed identified as either Chronically Homeless (454) or disabled (622). Of those who responded about their employment status (610), 104 were employed and 239 were actively looking for work.

### Race and Ethnicity



\*107 people did not respond to this question.

People of color disproportionately experience homelessness in Clackamas County. Four percent of respondents identified as Native American/Alaska Native, despite representing only 0.7 percent of the total population. Since 2017, there was a near doubling of the number of Black or African American people surveyed, from 23 to 41. People identifying as Black or African American now make up 4 percent of those counted, while representing only 1.2 percent of the county's total population.

1,166 homeless people were counted, including:

- 586 people were in emergency shelters, warming centers and transitional housing programs
- 371 people were unsheltered
- 209 people were living in doubled-up or unstable housing due to economic hardship
- 454 of the 1,166 counted were Chronically Homeless or in chronically homeless families

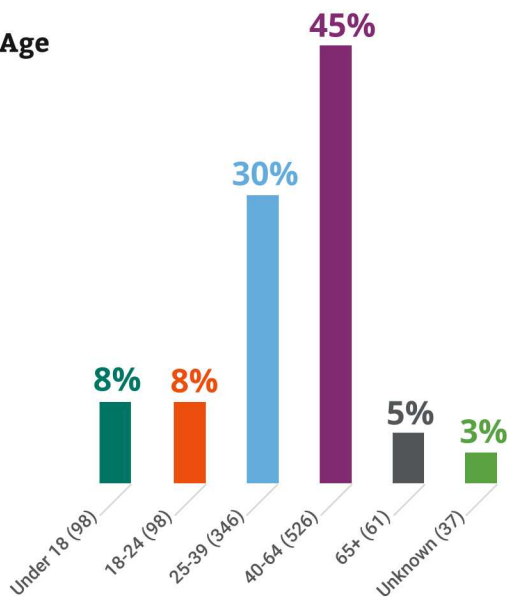


## Household Configurations

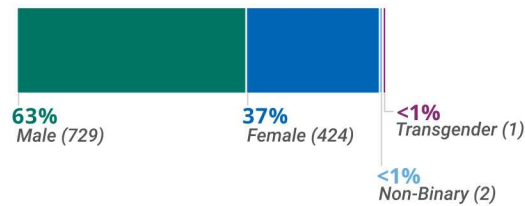
Households of all configurations were represented within the count:

- 171 people in households made up of adults with children
- 98 children under the age of 18
- 5 children with no adult in their household
- 158 unaccompanied youth (people up to the age of 24 with no other adults in their household)
- 869 single adult households (Includes seniors and Domestic Violence survivors)

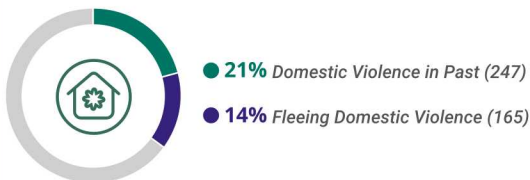
### Age



### Gender

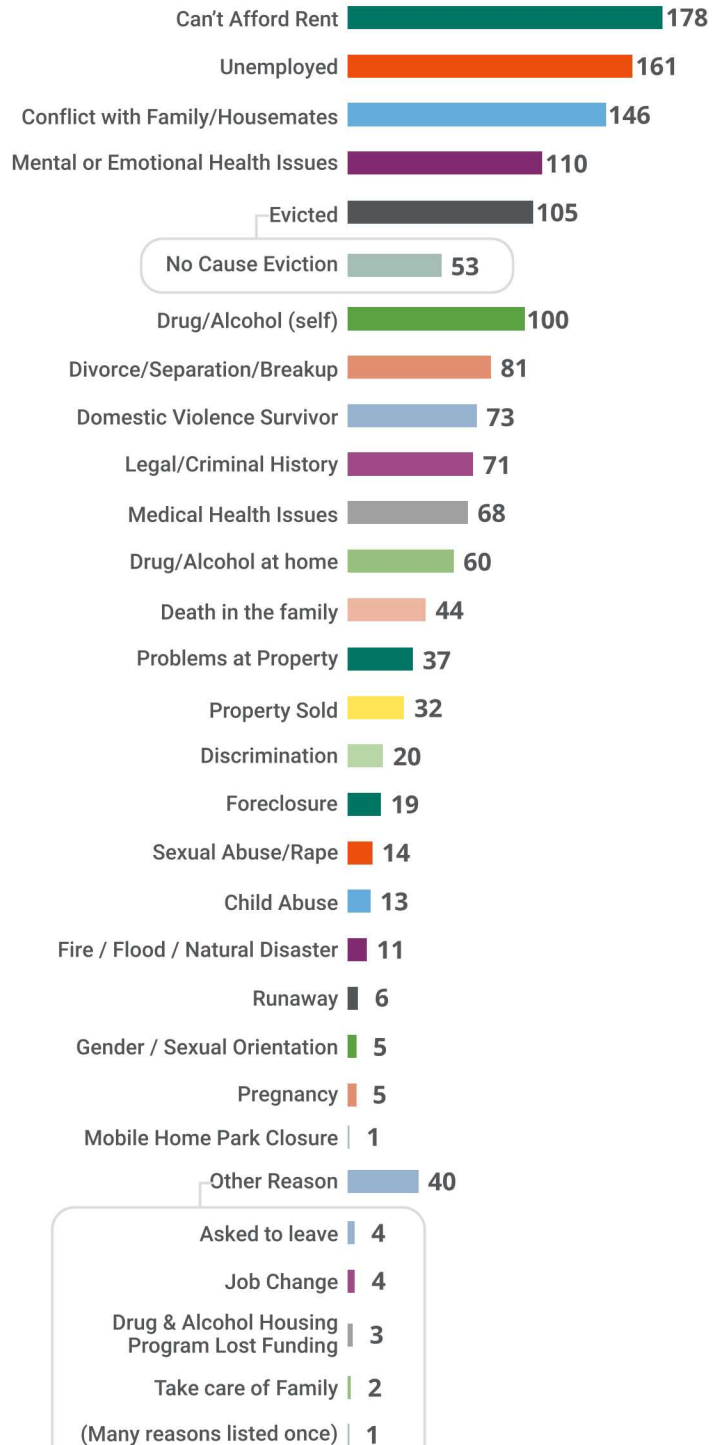


### Domestic Violence



## Causes of Homelessness

People were asked to review a list of possible factors which may have contributed to their becoming homeless. People could answer yes to as many reasons as they felt applied to them.



### Chronically Homeless

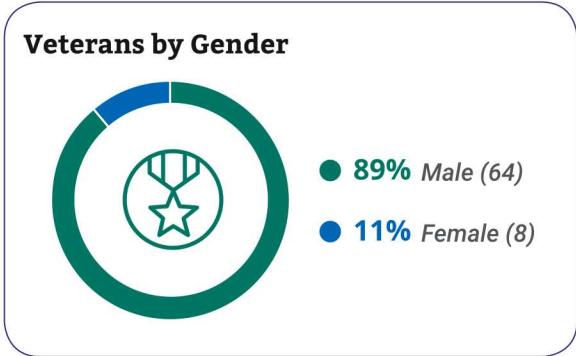
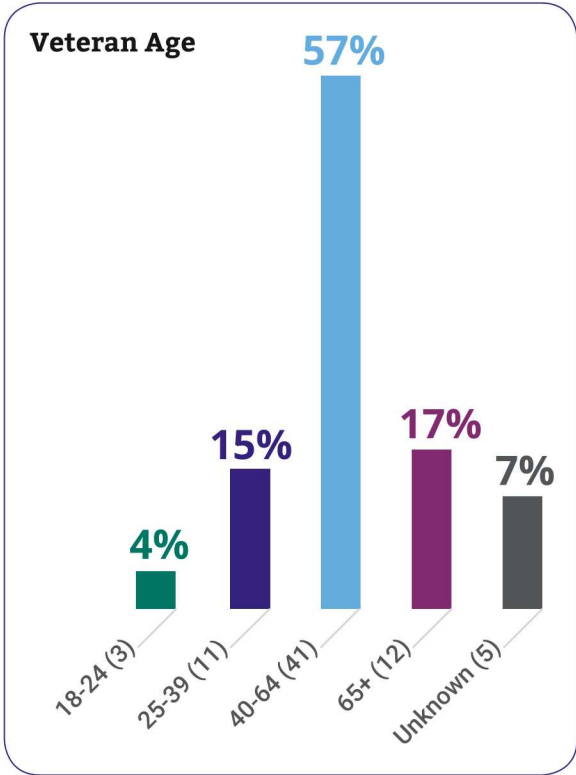
HUD defines Chronically Homeless as a homeless person with a disabling condition, who has been homeless continually for a year or longer, or has had four or more episodes of homelessness in the past three years totaling at least 12 months.

A family with at least one household member meeting the above criteria is considered Chronically Homeless. Self-reported Chronically Homeless households were comprised of 454 people of which 67 percent identified as male and 33 percent as female.

### Homeless Veterans

The number of veterans in the PIT Count experiencing homelessness decreased 15 percent in 2019.

During the 2019 count, 72 individuals reported that they had served in the US Armed Forces. Ten of these veterans live in households with children, 48 veterans were unsheltered and 30 veterans self-reported as Chronically Homeless.



### Learn more

Clackamas County is committed to reducing the number of individuals experiencing homelessness. A larger study of the state of homelessness in the county drawing on a variety of additional sources of information, including School Liaison data, Coordinated Housing Access data, and the Housing Authority wait-list information is underway.

To learn more about the county’s efforts to expand access to affordable housing and homeless services, see [www.clackamas.us/homelessness](http://www.clackamas.us/homelessness).

If you are experiencing a housing crisis or homelessness, call Coordinated Housing Access at 503-655-8575.

