



December 13, 2022

Planning Commission
900 E. Broad St., Room 511
Richmond, VA 23219

Dear Members of the Planning Commission:

The Partnership for Smarter Growth is pleased to see the City take initiative to improve zoning regulations when it comes to removing parking minimums and incentivizing Accessory Dwelling Units (ADUs). However, we have some significant concerns on the proposal to revise short-term rental regulations.

Our biggest concern with the proposed revisions is the proposal to remove the residency requirement for short-term rentals. The current regulations that require the short-term rental to be a primary residence for at least 185 days are a huge protection against bigger investors buying up Richmond's already limited housing supply to only be used for short-term rentals. Removing the residency requirement could create harmful negative impacts to the City, including severely limiting affordable housing stock, harming a community's quality of life, and losing the revenue from short-term rentals to firms and people based outside the community.

According to the American Planning Association and Sustainable Economies Law Center, along with others, instituting a primary residency requirement is one of the best tools to keep neighborhoods from being swallowed up by an abundance of these rentals.

We are in favor of the other proposed revisions to regulations for short-term rentals, such as limiting short-term rentals per neighborhood and per owner and improving compliance and enforcement of existing short-term rentals. Before the primary residency requirement is removed, more research should be done on the potential impacts to the community and especially on the supply of affordable housing.