

ATTACHMENT #4

**PUBLIC COMMENTS -
OPPOSED TO ORDINANCE OR
DESIRES LESS RESTRICTIVE PROVISIONS**

From: [LUISA ARANDA](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:41:12 AM

Dear Clark [County Officials,

We already pay taxes...I have a timeshare that is the Grandview rent out rooms already like a hotel daily or weekly when i turn in my timeshare it is a week that I paid for and wont use so I put in on VRBO...it will hurt the industry we are taxed to death already and

Regards,
LUISA ARANDA

From: [brian.sorensen](#)
To: [BL Public Comment](#)
Subject: Re: proposed Short Term Rental ordinances
Date: Wednesday, May 18, 2022 5:08:36 PM

Kind of joking but not really at all

who wrote these changes and proposed ordinances - was it the Association to Protect Corporate Hotels and Motels from individual short-term rentals businesses?

This reeks of corporate influence just like the efforts to stop ride sharing programs.

I know that this is after the deadline for comments but I hope it will be considered.

Thanks,

Brian Sorensen
2144 Ottawa Dr, Las Vegas, NV 89169
(702)210-9115

On Wed, May 18, 2022 at 4:58 PM brian.sorensen <briansalvcm@gmail.com> wrote:

Attn: Jordan Sandecki

Comments regarding the proposed changes and new ordinances related to short term rentals.

I Brian Sorensen of 2144 Ottawa Drive, as a native-born resident of Clark County, am opposed to any ordinances that restrict residents' rights to use their property as they see fit.

I understand that there are concerns relating to improper uses of residential rentals that adversely affect neighboring properties. And to this point, we have ordinances in Clark County intended to 'keep the peace'. I have appreciated the ordinances that restrict loud noises in residential neighborhoods after certain times in the evening. If I have a gathering and my guests park in front of a neighbor's driveway, my neighbor is welcome to have them towed away (I would hope that my neighbors would inquire for the owner to simply move their car, but if my guest is rude enough to park in front of my neighbor's driveway they deserve to be towed).

I have heard plenty of anecdotal evidence of 'renters' that have 'run amuck'. Movies such as Summer Rental starring John Candy have even portrayed the rift between locals and vacation renters. I would like to take an opportunity to remind everyone that Clark County is a tourist destination, and our economy is overwhelmingly based on this. However, competition is the lifeblood of our country and the large tourist industry providers must not be afforded unfair advantages over independent local competition. I was born here, I went to school here, I live here, I shop here; can the same be said for the corporations and their owners/shareholders. Please do not restrict locals to favor a corporation. Clark County tourism will not be diminished by residents allowing Short-Term Rentals.

I understand that the County needs to have some standards regarding commercial enterprises and their relationship and effect on residential areas. But I feel like the County is going too far in the proposed regulations. The efforts to restrict the use of the 'Short-Term Rental' from having 'social gatherings', or 'parties' appears to be an effort to deter people from engaging in Short-Term Rental. I am opposed to any ordinance that restricts an activity that any person in a residential neighborhood is otherwise completely entitled to. As far as specific comments on the proposed ordinances, I believe that the entire proposal should be 'scraped', but I will provide some items

that I feel are absolutely essential:

1. Section 7.100.160 (a) maximum occupancy - There are laws and rules for occupancy, setting an arbitrary standard is discriminatory to residential short-term rentals – There should be a requirement for occupancy determination by established standards.
2. Section 7.100.160 (b) Minimum Night Stay – Unless this will be applied to all short term rentals in the County clearly appears to be a deterrent and is discriminatory in nature.
3. 7.100.020 (p) Short-Term Rental Unit definition – This definition will cause problems for people who want to rent out multiple rooms to separate parties as prohibited by section 7.100.160 (c) Multiple bookings prohibited.
4. 7.100.170 (d) Local Representative – this section requires a local representative to be available to respond to the unit within 30 minutes – while this might seem like a harmless provision there are times when it takes me more that 30 minutes to travel 5 miles in Clark County – changing this provision to state that they owner must be or provide another who can act on their behalf to be in the county and available to respond at all times when the unit is rented.
5. 7.100.170 Complaint Response – also similar to 4 above the arbitrary 30 minute timeline is unreasonable – also this requires a response to the complaint within 30 minutes – this requirement could easily be abused to the detriment of the owner. All someone would have to do is call the County complaint line and allege that there is a renter parked in the street (while observing the action at 4pm but waits until 2am) and the owner would have to disturb his tenants by 2:30am to make them move their car to the driveway. Or similar to the previous example the caller could allege that there were more occupants that allowed again calling at 2am, and the owner would have 30 minutes to verify that the renters had not exceed occupancy. I could list countless more examples of how this could be abused.
6. 7.100.170 (h) visibility of address – requiring lighting of an address which is not required of any other person or business in Clark County appears to be a discriminatory deternt.
7. 7.100.170 (i)(1) – duty to maintain – codification of this item is too broad – not sure of the intent of this section except to give broad authority to shut down a short-term rental simply because an outlet fails or one shower becomes broken during a rental stay, but the renter is able to use another shower in the unit.
8. 7.100.170 (i)(2) – duty to maintain – right to inspect – tenants have a right to privacy which would be invaded and I believe actually unconstitutional – again unless this is applicable to all rental operations in Clark County then it is clearly a discriminatory deternt.

I don't believe that the County needs these ordinances to protect the residents from 'partying' renters. Just because people do not 'like' tourists or think that they should be confined to the 'Strip' or 'Downtown' is not realistic.

Having been the target of a neighbor's displeasure with social gathering that I have had at my residence in the past, it is my experience that complainers can and will abuse their power. In my case the police came out three times over the course of an evening, and every time indicated that I was in compliance with the laws and with their requests. At the end of the third visit they indicated that they would advise my neighbor to that they dis not have any valid complaints.

The problems of disturbing neighbors are not exclusive to short term rentals. I have myself disparaged 'renters' in my neighborhood; because, in my opinion they do not care about the long term prosperity of the neighborhood and it's values.

I do not take issue with the collection of taxes when such activities are business related as long as they are fair and reasonable.

I have abridged my comments but I have countless others related to the proposed changes and new ordinances for Short-Term Rentals.

Brian Sorensen

2144 Ottawa Drive

Las Vegas, NV 89169

Please feel free to contact me for any clarification or for additional comments

From: [Tyler Detweiler](#)
To: [BL Public Comment](#)
Subject: STR suggestion
Date: Wednesday, April 27, 2022 7:08:35 PM

Hello,

I am in Unincorporated Clark County and was really looking forward to runni9ng and STR, but unfortunately I am on Septic. I need to be able to run this to survive, is there any way you could not require city sewer to apply?

Regards,

Tyler Detweiler

From: [Matt "Rabbit" Dale](#)
To: [BL Public Comment](#)
Subject: Impact of draft ordinance
Date: Wednesday, April 27, 2022 8:12:13 PM

Good evening and thank you for the opportunity to provide comments!

I've talked with the Henderson ordinance office on a few occasions since they decided to begin enforcing some but not all of the proposed elements of the Clark county draft ordinance.

A little background on me. I am a retired Air Force officer who moved to Las Vegas seven years ago on my last assignment and fell in love with city and Nevada. It was pretty easy to retire here and enjoy all we have here. Part of that retirement plan was procuring short term rentals. I have operated and owned two short term rentals over the last two years in Henderson. During which I have maintained personal relationships with all my neighbors and afforded their extended families with local accommodations for holidays. I have provided affordable care housing for low income transitions. And during the years of COVID, these short term rentals provided a safe space for families to visit the area but not be disturbed by the large crowds within Las Vegas hotels. Finally, as a licensed short term renter, I have provided tens of thousands of dollars back to the city of Henderson while at the same time taking no profits myself and instead investing back into the houses and the community. Short term rentals allow for that since we can charge a higher premium for stays.

While I am grandfathered into the two rentals I have, I was hopeful to expand my business and provide these benefits to more visitors and neighbors. Unfortunately the new laws don't allow for that for a few reasons. First, the requirements that HOAs have specific verbiage that state they allow STRs essentially destroyed STRs in Clark county since nearly 90-95% of communities have HOAs and no known HOAs have that verbiage or any intent to put it in their CCRs (I've talked to a few HOAs about this). This will slowly kill the STR enterprise in this county and will result in massive loss of income to the county in the form of taxes.

The second point I have is that the county ordinance offices are not uniformly receptive to helping STR establishments. While Henderson is fairly responsive and their interactive map and payment sites are extremely useful, north Las Vegas has repeatedly ignored calls and assistance. When I've asked about a potential house being a STR, they tell me to buy the house and put in an application to find out. That's a fairly expensive gamble for anyone as you can imagine.

My third point is that cities are being allowed to cherry pick the ordinance. Specifically, Henderson adopted all elements of the proposed law except for the single one that would be beneficial to STR owners. They said they will maintain their own 1000' limit between rentals but adopt all the other restrictive measures. This is unjust to the enterprise and will continue to destroy these businesses.

I do think that it is beneficial to the county to limit STRs to those local residents in good standing, limit the amount of nonresident/corporate participation where those entities cannot be responsive and develop a personal relationship with neighbors. Financially, the one thing that would hurt me is if I were to become personally incapacitated then I would not want the change of ownership to my wife or my coowner to lose the privilege to continue operating as an STR. I'd like to be able to transfer them into an LLC with all our names on it but Henderson said that would constitute a change in ownership which I think is not logical since I would still be connected to the LLC and it also protects me legally and my personal property outside of the STR. Additionally, if I could not continue to operate or if my survivors couldn't operate then we've essentially lost \$20-40k per house in furnishing and supplying.

Again thank you for your consideration and I hope to continue a long term business relationship within Clark County.

Matt Dale

Sent from my iPhone

From: [Hunter Milner](#)
To: [BL Public Comment](#)
Subject: Distance Between Short Term Rentals
Date: Thursday, April 28, 2022 11:35:19 AM

Hello,

I would like to bring up that the distance of 1000 feet in between short term rentals is beyond reasonable for most neighborhoods in Clark county. It also disparantly favors certain neighborhoods, especially luxury neighborhoods where houses are spaced further apart. This is a direct hindrance on lower income communities being able to generate revenue from their property and be able to get ahead.

Please explain why 1000 feet was chosen over the 600 feet suggested by the state of Nevada.

thank you,

Hunter Milner

From: [Wendy Weissman](#)
To: [BL Public Comment](#); [Wendy Weissman](#)
Subject: Comments on Proposed STR ordinance
Date: Thursday, April 28, 2022 4:24:04 PM

To whom it may concern,

I recently purchased a vacation home that would be covered under the new law. I am making a \$100,000 improvements to my home and my hope is that I can make some money when I am not using my property. Since noise is the #1 complaint of short term rentals, I am making sure I have two noise monitoring systems that will alert me when there might be an issue.

But what I am hearing is that there might be a lottery? To me this makes absolutely no sense. I have a degree in Economics and Mathematics and let me explain how this will only lead to non compliance and many many properties running illegal short term rentals.

- Firstly to encourage compliance **you want regulations that are simple (or relatively simple) and the cost to comply is relatively low.** When and if you place such a high burden on becoming legal will only discourage people and they will simply continue to operate illegally.
- More importantly is the idea of a lottery. **Lotteries work well when there is very high demand and limited supply for a relatively inexpensive item.** For example tickets to a NFL game or the Olympics. That said a short term rental might generate 10s of 1000s of dollars to the lucky winner. This will create yet another huge incentive for the losers to do illegal short term rentals. If one person wins and makes say \$50,000 where another makes zero what do you think will happen?
 - The better solution is to have an open enrollment period. During this period all who wish to get a legal license to have a short term rental will be able to do so.
 - All have to comply with the ordinance, get the licenses, prove they are in compliance. All who qualify will be the basis for post enrollment 1000 foot exclusion zones. This is similar to what Henderson did, with one exception as there are no where near the number of STRs in Clark County due to the current ban.
 - What the open enrollment process will allow is to encourage people to register now and comply with the law. That is the best way to achieve the outcome that the state law is hoping to achieve.
- **Will current illegal STRs be allowed to be in the lottery?** What incentive do I have being a legal host (I have not rented for less than 31 days) that someone who has been running one illegally gets the license but I do not? This seems really really unfair and it would be easy to find out who the illegal hosts are now as they are on platforms like Airbnb and VRBO. Isn't it better to encourage everyone to comply with the law then?
 - Will there be any appeal with the lottery?

- How will you determine the criteria for the lottery? Completely random pic? You might end up with two close to each other.
- After the first lottery, how will you determine who is eligible? Will there be another lottery? Or is it simply based on the 1000ft exclusion zone? This is so easily set up if you provide a website similar to what Henderson and Las Vegas do. There I could look up an address and see if a property I was considering buying is within the exclusion zone of another STR. Then if you make it an open enrollment you will have all the STRs on the map easily visible for anyone else to reference.

If however you make it so unfair and ripe for distrust you will simply not achieve anything and most people will simply continue to operate as they are now. So I ask you what is the goal you wish to achieve? Is it to comply with the state law and reduce complaints? Or is it simply to seem like you are complying with the law but in reality you will enact regulations that in fact will achieve the exact opposite?

My suggestion is this:

1. Charge for a license. \$1000 is fair and will disincentivize the non serious and non-professional hosts.
2. License can be revoked if too many complaints.
3. Open enrollment period and all grandfathered in.
4. Notification to neighbors intent to STR so they are aware if there are any problems.
5. Local contact person in case of any problems (noise or otherwise)
6. 1000 ft exclusion zone AFTER open enrollment.

Losing the license of what could be tens of thousands of dollars in revenue should be incentive enough for people to want to comply. There is no need to limit by lottery too. If everyone complied and are quiet then what does it matter if there are a few STRs nearby? All we hosts do is invest \$100,000 in a complete remodel of my home supporting the local economy and construction industry, not to mention improving my neighborhood as well.

regards,

Wendy Weissman
424 237 4378

From: [marie2hkup](#)
To: [BL Public Comment](#)
Subject: Short term rental
Date: Friday, April 29, 2022 8:26:37 AM

Why is it that the rental has to have sewer connections? Many homes that have casitas are on septic and they should NOT be excluded.???

Sent from my Verizon, Samsung Galaxy smartphone

From: [L P](#)
To: [BL Public Comment](#)
Cc: [L P](#)
Subject: Apartment short-term rentals - Please reconsider
Date: Friday, April 29, 2022 3:21:20 PM

Hi,

Please reconsider allowing renters the opportunity & ability to rent extra rooms or spaces to people looking for short-term stays using apps like Airbnb & VRBO.

Many renters could greatly use the extra income as we're now emerging from a very difficult financial period due to job losses caused by the pandemic. Additionally, renters should be allowed the same freedoms & flexibility to be self-starting, self-employed, self-sufficient, capitalistic, & entrepreneurial in selling spaces within our homes for temporary usage, just like any other home-owning resident of the Las Vegas metro area.

It's simply discriminatory, unfair, & economically hurtful to a large swath of renters in the valley to disenfranchise us from the same equal opportunities for economic empowerment & financial independence afforded to non-renters. We want & deserve to have the same rights to do as we wish with available spaces within our homes as any single-family home owner does with theirs.

Please reconsider, & let me know of any questions.

Kind Regards,

Luis M. Pena, Jr.

310 465 6716

From: [Crane777crane](#)
To: [BL Public Comment](#)
Subject: Septic Tanks in Short Term Rental Ordinance
Date: Saturday, April 30, 2022 9:18:58 AM

1. Please delete the provision outlawing septic tanks for short term rentals.
2. Most septic tanks are in rural properties that do not have close neighbors. There is no risk of noise nuisance on our properties; guests do not disturb anyone. We are the best choice for for short-term rental permits.

From: [Maria Dimova](#)
To: [BL Public Comment](#); [Maria Dimova](#)
Subject: Short term rentals
Date: Saturday, April 30, 2022 9:20:09 PM

My concern is about short term rentals as "The Harmon", Emerald suites. Those apartments are short term and the rent is paying weekly. Now, I live in one of them. There is a rumor, that „The Harmon" will become on monthly basis with a lease. Those apartments are for people with low income. Why some nonprofit don't buy them and use them to as subsidized housing? The low income family with kids live here, old retired people, who can't afford better place as Florida, where leave the wealthiest [retired](#). At least, make those apartments subsidized and improve their conditions. Nearby it's Virgin hotel and a canal with dirty water and trash, cockroaches we everywhere, the water stops of them, the pipes are clogged and water run back into the kitchen sink sometimes, there is molds and check point at the gate, I guess to stop unvited people, but they stop also Uber, Lyft, Meals on the wheels and grocery delivery, or food delivery, if you order a Door dash. People live in like ain a sanctuary city, separate from the civilization, as we are a second class citizen. Why is that? And the real estate company make a profit from towed cars, because they have a contract with them and their truck circles here every day, plus the pool parties at Virgin are blowing my ears every weekend. Some people work grave yard here. Why is the „the care of those less fortunate have to pay high prices for unhygienic buildings??

[Sent from the all new AOL app for Android](#)

From: [Walter](#)
To: [BL Public Comment](#)
Subject: Too Short for Short Term?
Date: Tuesday, May 3, 2022 4:21:04 PM

I'm sure you realize that each February every one of the huge number of month to month leases in Clark County will fall under your definition of less than 30 days and thus considered "too short" to rent?

Best of luck with this legislated can of worms.

Walter

From: [Cam Ferguson](#)
To: [BL Public Comment](#)
Subject: Airbnb
Date: Tuesday, May 3, 2022 6:59:13 PM

I don't think people earning money for thier houses is a bad thing. Some people are priced out of the strip or don't want the hotel experience.

I just want to make sure we make it easy for the hosts to get licensed, but I believe it should be a registration. Mabe they pay a service fee through Airbnb?

From: [Ramsey Jone](#)
To: [BL Public Comment](#)
Subject: Proposed STR Regulations
Date: Wednesday, May 4, 2022 3:19:53 PM

If you want to provide affordable housing as noted 7.100.010.(a), please stop the mass purchasing of houses by huge corporate companies (that drive up rent and take them off market for less supply) instead of regulating small businesses (trying to provide for their family) giving a unique experience to people visiting Vegas.

Concerned Las Vegas Small Business Owner
2nd Generation Vegas Borne

From: [David Taylor](#)
To: [BL Public Comment](#)
Subject: str
Date: Thursday, May 5, 2022 11:59:02 PM

I think there should be more than 1 % of license provided. It will generate more tax revenue for the county. if you have a licensee not following rules, Fine them(more revenue for the county) if they continue to violate rules, shut them down. There are alot of great and responsible STR owners and operators that follow the rules. Please don't put all of us in the same group.

From: [Jean Gottschalk](#)
To: [BL Public Comment](#)
Subject: STR public comment
Date: Friday, May 6, 2022 9:28:48 PM

Hello,

I am a resident of Overton, Moapa Valley. I was disappointed to see that STRs are not allowed in rural areas in the proposed ordinance. What is the reasoning behind this? Have you actually asked the residents in those areas how they feel about this? (Via town boards)

In my opinion, the rural areas is where the Stars could do the most good by bringing much needed tourism which would create economic activity and help support our few local businesses. Tourism in our rural areas is currently very limited due to the lack of suitable accommodations for the type of tourist that we want to attract (families and retirees).

I also believe that the rural areas is where Stars would have the least chance to be used as party houses, since we are so far away from Las Vegas.

I noticed that you also have a restriction when no public sewer service is available. This is also unfortunate since it eliminates most of the rural areas already, so why feel a need to specifically exclude rural areas in addition to this?

The inability to run a STR on a septic does not make sense to me, since the load that is put on the septic system by guests occupying a STR (in my mind, a single family home) would be no different than the load created by a family living there full time.

These are my comments and I hope you will reconsider this missed opportunity for economic development in our rural areas.

Jean Gottschalk
175 Ramos Ranch Rd
Overton, NV 89040
702 371 2730

From: [Dov Barry2](#)
To: [BL Public Comment](#)
Subject: STR
Date: Saturday, May 7, 2022 5:15:27 AM

There are many licensed and unlicensed operators in Las Vegas. 99% of them are no problem. Making it difficult or impossible to register an STR and pay tax on those rentals is not the right move.

Anyone who operates an STR that causes disturbances or problems to the neighborhood should be fined or lose their license.

Stop protecting the hotels. Many families with many kids need a house because they cannot have small kids in many rooms all over a giant hotel. There is a huge need for this type of accommodation, and the large hotels hate it because they want every dollar.

Thank you!!

Dov Barry

From: [Essie Taylor](#)
To: [BL Public Comment](#)
Subject: Short term rentals
Date: Sunday, May 8, 2022 12:25:30 PM

Good afternoon,

I am a short term rental host here in Clark County. I enforce extremely strict rules on my guests about noise to make sure that nobody around will be disturbed. Parties are not acceptable on my property.

I have a large family who live out of state who visit every year. For them to be able to stay in one place all together is very important.

I also create a wonderful place for other families who come to visit, most of them have kids and need the convenience of having their own kitchen and laundry.

I have spent a lot of money to make this home exceptional which will always help the values in the community.

It's important for the city to be able to offer short term rentals for visitors that are operated properly and do not disturb the neighbors. I agree that the bad operators should be banned. It also helps the city collect taxes. My property alone would pay over 31,000/year in taxes.

Regards,

Essie

From: [Olive Knaus](#)
To: James.Gibson@clarkcountynv.gov; [Justin Jones](#); [Tick Segerblom](#); [William McCurdy](#); [Ross Miller](#); [Marilyn Kirkpatrick](#); [Michael Naft](#); [BL Public Comment](#)
Subject: I AM A LICENSED OPERATOR IN THE CITY
Date: Monday, May 9, 2022 10:48:13 AM

My name is Olive and I have an SUP in the City of Las Vegas.

I have been operating since 2018 with ZERO violations and ZERO complaints from anyone in my neighborhood. My guests often cancel because of loud music from my neighbors that bother them or they cancel because they do not feel "safe" in my community because of the graffiti on block walls and homes that are clearly neglected, it is EMBARRASSING. I have the NICEST home in my neighborhood but I am often made to feel like a criminal for being an STR operator because that is how we are treated. It is inappropriate to group us into the same category as Cannabis, Liquor and Strip Clubs as Segerblom has often referred to us as. Sleeping in a home over a hotel room is a preference not a "vice" or "bad habit" Not everyone wants to stay in a hotel room on the strip. This restrictive ordinance will not force out unlawful operators nor will it push tourists to stay in a hotel, they will simply choose an unlicensed home or travel to another destination where they can rent accommodations that best fit their needs.

The continued rhetoric that STR homes are party houses full of prostitutes and pedophiles or whatever other nonsense that is continually being pushed as the STR narrative is absurd. You should have the capability to handle the handful of bad party home operators and separate them from the rest of the operators like myself easily but from what I have seen the commissioners prefer to group us all into one bad category which is UNFAIR but pleases the anti STR constituents that reside near the party homes. I am surprised and disappointed that commissioners consistently take into consideration the feedback from anti STR constituents that do not operate any STR properties. Why not ask the operators in the city that have permits like myself questions or opinions or advice on the ordinance?

The ONLY difference between a long term renter and a short term renter is the length of time and the tax revenue that is remitted. STR guests aren't "worse" than a long term tenant in fact I believe them to be more respectful to my home than a LTR.

Every tenant renting or home owner in my community looks like trash with debris, tall weeds, broken down cars etc. It is a full time job for me to police how the neighborhood looks because I know it affects my rental revenue and bookings. For two years I have heard this from Code enforcement "We are not issuing violations because of COVID and homeowners do not have money to attend to violations" . It is a slap in the face when tenants and homeowners in my community get away with constant violations yet I am scrutinized with a magnifying glass constantly. I literally walk around the community and pick up trash and spray paint over graffiti myself because that is faster than calling the city. There are homes next to me where there are literally 20 people living there with 15 cars parked up and down the streets. With the exception of my home my entire community looks like a low income third world country environment.

I have had to call code enforcement on my neighbors for having illegal food sales on the weekends and turning their driveways into makeshift restaurants. Every corner around my community has illegal vendors selling ice cream, chips, slushies, tacos, corn on the cob, you name it and it is there. I have called Code, the health dept, metro and every other agency about

this for over 2 years and these illegal, unlawful vendors continue to operate on the same street corners day in and day out. No one bothers them but I get treated like a criminal for having a lawful business that contributes thousands of dollars to this state.

I send tax revenue to the city every month, I employ a cleaning staff crew, a landscaper, a pool tech, a handyman, a painter, a mason, an electrician, a laundry service, a mural artist, a plumber an interior designer, etc....My guests spend THOUSANDS of dollars on the strip and at local businesses around my home. They are not a nuisance, they are bringing tourist dollars to this city. They are only a nuisance to non STR homeowners because they cannot separate us from party operators or are simply upset or envious that someone other than them is generating income from their homes.

The demand for this business will continue and I know for FACT that the current proposed ordinance will only encourage the bad operators to continue and prevent good operators with best practices like myself from being able to scale our businesses.

Tarkanian and her anti STR campaign and her policy on banning whole home STR in the city of Las Vegas only increased the problems. Since the ban, Illegal operators have hiked up into the thousands and are still going strong. I have so much unlawful competition that I have my highly upgraded 1800 square foot 4 bdrm 2 bath with pool home advertised for \$150 a night and it still doesn't get booked. What has the city of Las Vegas done to help me here? NOTHING. This is EXACTLY what will happen in the county with this restrictive proposed ordinance. If you want answers on whether your restrictive ordinance will work just look at history over the last 4 years in the city of las Vegas.

I do not feel that the Lottery system is fair nor is calling it a "random selection" to soften the blow of having a lottery.

I have been patiently waiting on an ordinance for YEARS on turning my other property in Clark County into an STR, now some investor from out of state or a Chinese owned LLC can be selected at random over me?

The distance separation is too high and capping the number at under 3000 is too low and the illegal operators will simply continue to operate while the County loses tax revenue.

Feedback from experienced and knowledgeable individuals like Julie Davies, the educator for the college accredited STR class should be worked with. Feedback from legal operators like myself should not fall on deaf ears and should be taken into consideration more seriously.

Thank You for your time,

Olive

From: [Mary Nance](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:40:09 AM

Dear Clark [County Officials,

I am an owner of a condo unit which is rented out for short term usage. This is an investment to help supplement my retirement. Additional restrictions or costs impact me personally.

I believe the new regulations, as laid out, will have a negative impact on both small business owners and consumers.

Specifically, consumers will have less choices and limited opportunities which will result in increasing their cost due to limited and/or restricted units.

Small business owners will be restricted under the proposed rules listed below:

- Limiting each person to operating a max of 1 property; Why not more? This appears to be a bias against small business owners and infringement on ownership rights. Hotels own more than one hotel property.

- Requiring a 1000' buffer between each short-term rental property; How are small business owners supposed to know who else in their condo complex are using their unit for STR? Who regulates this, and or will decide which owner is allowed to rent their unit out and which are not? This will also put a burden on HOA managements, adding to their oversight and create conflicts with owners. This will increase the burden and liability with a hard to follow requirement.

- Creating a cap on licenses at 1% of total housing stock for each unincorporated area; ANOTHER license fee and cost to small business owners! As a small business owner, my profit margin is already small and squeezed. This is an added tax which cuts into opportunity losses and/or increases costs for consumers.

At a time when we are trying to stay competitive, build back our economy, create jobs, these added limitations, requirements and costs burden small business owners who are struggling now.

I would appreciate an effort to "entice" small business to take the risks, create opportunities and encourage consumers to come to our area.

Not increase their costs and limit their options.

Thank you for considering a review of the proposal and making it more small business owner friendly.

Mary Nance, SPHR
GK Invest Now, LLC
425-232-1276

Regards,

Mary Nance

From: [Nakia Woodson](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:42:19 AM

Dear Clark [County Officials,

All these restrictions should be eliminated EXCEPT minimum 2 nights. 1000 sf is too much distance. A cap at 1% is too restrictive. 2 people per room is ridiculous. People are family and friends , so if you have 2 bunkbeds, 4 kids cant sleep in the same room. There should be a two night minimum, the rest of the restrictions should be eliminated.

Regards,
Nakia Woodson

From: [Shawn Cunningham](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:43:27 AM

Dear Clark [County Officials,

These proposed rules will do nothing to accomplish the goals of the ordinance. For one thing, there are thousands upon thousands of illegal STRs in Clark County, if you restrict all of those they will simply continue to operate illegally while depriving the county of revenue needed to enforce it. Instead of creating rules that are basically a de facto ban, focus on enforcement and having good hosts. 10 guests per property on a 5 bedroom house is too few. It negates the reason people stay in short term rentals, which is to congregate with family. I think 12 or 14 is more reasonable. No cap on housing stock as that is a self-defeating rule that will leave 90% of STRs illegal, what's the point of passing an ordinance that doesn't solve any problems? And limiting financial stake to 1 person is also pointless - why would you want to discourage professional investors who will likely take the rules more seriously? Some cap is fine but 1 is unreasonable. Maybe 5 properties. I am happy to help find a good common ground. I manage 16 short term rentals legally in Henderson and we are good neighbors, don't have parties, and have good guests. Model your rules to encourage good hosts, and provide enough revenue to remove bad hosts.

Regards,
Shawn Cunningham

From: [Tranquility Vacations](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:44:20 AM

Dear Clark [County Officials,

Can we limit the amount of hotels one has interest in? Liquor stores? Movie theaters? Why and under what rights can you limit the amount of properties one has a financial interest in?

also 1000' buffer? for what reason? Does this actually accomplish anything other than arbitrary rules?

Do we limit how many people can stay in a hotel other than the actual person limits as dictated by fire code? then why should we limit vacation rentals by anything other than fire code?

Regards,
Tranquility Vacations

From: [Kacey Nielsen](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:45:15 AM

Dear Clark [County Officials,

I am the mother of six children who loves to travel. As you can imagine, hotels are difficult to manage with so many children. Short term rentals make it possible for us to travel together but enjoy our own bedroom space and usually backyard space for kids to run. I think allowing short term rentals will be a benefit to our community and great for traveling groups and families. I believe some restrictions are good, but only 2 people per bedroom is not very functional for people with multiple children. We also know people who run short term rentals in multiple cities and limiting them to just one property seems unnecessarily prejudicial. If you are concerned about very large corporations owning half the city and turning it into short term rentals, then I would suggest a limit of 5 houses or less as a more reasonable alternative.

I also believe the minimum of 2 nights is unnecessary. When we are flying into a city to travel onto another destination, we frequently only need lodgings for a night before moving on. I believe there are better ways to avoid "Party houses" and other disruptive practices without depriving people the ability to house their group for a night when their travel plans are taking them elsewhere.

Regards,
Kacey Nielsen

From: [Richelle Heldwein](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:46:20 AM

Dear Clark [County Officials,

Thank you for taking the opportunity to review the Short Term Rental regulations for Clark County. I appreciate a thoughtful approach to allowing these rentals.

I have operated a short term rental in Idaho for over 10 years and I am committed to quality housing for renters, and a stringent screening process for guests. I don't want problems in our unit, or in our neighborhood, and I am committed to those high standards.

I would request that the proposed standards be amended as follows.

1. please do not limit to a 1000' buffer between units. If I were to purchase two adjacent units for convenience and better ability to monitor and control, I would not want to be penalized and not allowed to rent one of the units.
2. Please do not limit to 10 total people per property. I have a 3000 square foot cabin in Idaho and it can obviously comfortably fit more than 10 people and I am careful to provide adequate parking and outdoor space for more than 10 people, so limiting to 10 people would not be reasonable for a large property with adequate parking and outdoor space.
3. I support the 2 night minimum stay and can accommodate that.
4. Please do not limit to 1 property per owner. Those of us that have been doing this for many year are able to manage more than one property and have been doing it successfully for years. Also, this is not a limitation for long term renters and investors and they historically have more problematic renters than short term rental properties. This regulation goes against fair business trade and against property owner rights.

Thank you for your consideration of these amendments.

Regards,
Richelle Heldwein

From: [Peggy Kennedy](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:48:11 AM

Dear Clark [County Officials,

I believe you are being lenient on the number of days someone can stay for a short term rental period. If the goal is to stop the "party homes rentals", it would seem prudent to lengthen the required stay to target those who are more inclined to come to Las Vegas for a "fuller experience". No one wants to have their home ruined by ruckus and bad behavior. Equally, no one wants to pay you to allow them to use their home for some extra income, which is why they try to do their short-term rentals without notification. My home is not used as a rental, but those who do pay up to 30% to a company that advertises their homes in an attempt to have potential users treat them homes with respect/much like they would treat their own homes. Now, counties want in on the potential earnings as well..why? If a home has chronic problems with short-terms clients, then deal with those individuals as slum lords/inattentive owners, using the law as the guide. Allow others, who operate in accordance with their HOAs and have guests who abide by the rules and occupy their homes as they would their own, to continue to do so. These types of rentals are common place in many countries and allow people to stay within a community at large. Las Vegas may have some "at large" reputations as a party location, but that is also promoted as part of the tourist attraction--gambling, shows, and "what happens in Vegas, stays in Vegas" mentality. It is also becoming a place for more for families as time passes and short term rentals will be a great alternative to the strip/downtown for family outings. If I were to make my home available, I would most certainly prefer a family of 7 to a party of 20 of party-goers. Maybe looking more into how homes are advertised, over if they are okay and how much to charge for their very existence would be a better method of discussion. Many people continue to work themselves back to a new normal/safety and don't need further complications with too much government interference. And, this 1000' makes little sense at all. Neighbors are not allowed that luxury; why add that burden to those wanting to short term rent. The contract can handle hours, noise, etc. We certainly did not place that burden on contractors/construction companies.

Regards,
Peggy Kennedy

From: [Itay robi](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:49:17 AM

Dear Clark [County Officials,

This is my job now

If not The short term rentals I have not any way to do money

This is the food for my kids

And all the regulation that you guys going to do is not really to help or to keep it good

Give the people the opportunity to rent they own property as much they like

They buy it with them Money and you guys can ask for taxes and everything but not to give only 1% of the people license and with all the regulation of only one property or max of people this is not going to do anything instead mass

Regards,

Itay robi

From: [Nira Bell](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:50:09 AM

Dear Clark [County Officials,

I really think that you need to increase the licensing of STR to more than 1% this STR bring lot of work for cleaning peoples maintenance peoples landscaping and extra income for peoples that can live better and enjoy to host people from around the world.

Right it's need to be under Stiction like city of Hendeson but 1% will not the right decision and just will keep the same status.

Regards,
Nira Bell

From: [Paula Caballero](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:51:15 AM

Dear Clark [County Officials,

I support reasonable regulations of short-term rentals. I believe that officials should create an ordinance that is similar to the City of Henderson. I urge officials to create something that is fair and enforceable.

The occupancy limits on a property are important and fair, and the minimum length of stay could even be longer. If you are worried about parties, make the minimum night's stay 4-5 nights. If you are worried about encroaching on hotels, their average rental is around 2 nights. So why not ensure people who are renting homes in neighborhoods are coming for reunions, soccer tournaments, dance competitions, to visit family, etc. Longer rentals yield better guests. Period.

However, limiting a person's financial interest to having 1 vacation rental property seems unreasonable. The 1000-foot buffer should be reduced. The cap on licenses is also not productive because it's untenable.

Creating an ordinance that serves everyone is a mighty task, but creating an ordinance that doesn't engage responsible property owners/managers by showing them a clear a roadmap to legal short-term rentals isn't productive for anyone. I urge you to revise this draft, please.

Regards,
Paula Caballero

From: [Billy hayes](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:52:08 AM

Dear Clark [County Officials,

Please do not hinder any short term rentals. It affects all of us and should not only be allowed for the corporations and big hotels. This is a living for thousands of us.

Regards,
Billy hayes

From: [Anuk Withers](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:53:12 AM

Dear Clark [County Officials,

Insisting on 1000' between units is impossible to establish in a condominium environment.
That is a regulation that should be eliminated.

Regards,
Anuk Withers

From: [Carla Ratliff](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:54:24 AM

Dear Clark [County Officials,

Dear Sirs and Madams,

I sincerely feel that the proposed short-term rental ordinance is unfair in multiple ways. I believe that short-term rental owners have been operating in the county for decades with zero to little disturbance to the community in most cases. It is unfortunate that a small number of bad operators have prompted such vitriol and opposition to an option that is available to families worldwide without these kinds of unreasonable restrictions. I strongly believe that we, as a community, should be able to rely on our city officials to bridge the gap between the community and evolving consumer needs when it comes to travel. Our beautiful city has something for everyone. It is full of fun options for people of all ages. It is commonplace for all kinds of sports competitions for kids. As such, whole-house rentals are necessary and should be readily available.

If this ordinance passes as written, it is my opinion that it only serves as another example of government overreach with laws enacted just to hurt the people that are honestly trying their best to abide by them. There are good legitimate advocacy groups such as the NVRP with knowledgeable leaders willing and able to assist with reasonable ideas and changes to the ordinance.

Thank you,

Regards,
Carla Ratliff

From: [Jason S](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:55:09 AM

Dear Clark [County Officials,

I am the owner of 1 full time short term rental in the county and also 1 part time short term rental. I use the income to support myself, my wife and my mother and brother. Without the income from my str's I would not be able to help my family as much as I can now. I previously worked and still do in the casino industry but I want to transition out.

I'm scared to do so and burning myself out doing it all myself.

I would love to operate legitimately and pay occupancy taxes.

I love the business and refer my guests to local small businesses all the time. Those business I believe depend on that income.

What if a neighbor applies and gets an str license just to block others from getting one? Then nobody wins.

I am very good at what I do and just want to operate an honest business.

I believe Henderson got it right when they started in year 1 having no distance separation rule in turn allowed everyone that wanted to operate legally to do so.

I believe a lot of owners will not comply and just go further underground if the current proposed regulations pass. They will still operate and it will be much harder and more expensive for enforcement.

We are Las Vegas, I believe we can show the world how to do this right. Please pass reasonable regulations so I can still take care of my family.

Best regards,

Justin.

Regards,
Jason S

From: [Taylor Weiss](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:56:14 AM

Dear Clark [County Officials,

I agree with the 2 night minimum.

I disagree with limiting it to one only.

There are some operators that are better than others and limiting to one is going to stop anyone from really getting down the operating procedures to make them a better operator.

I also agree with the 2 per bedroom however maxing it at 10 is slightly excessive. Max should be capped at 14-16.

1% of housing is not fair either. The amount of permits you have available doesn't directly affect the housing market in the way you think it does.

I am a realtor and I can tell you that with confidence. The correlation is insignificant to the inventory available.

Regards,
Taylor Weiss

From: [Kwixuan Maloof](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Tuesday, May 10, 2022 6:57:15 AM

Dear Clark [County Officials,

The short term rental restrictions are unnecessarily restrictive making it impractical to have short term rentals.

I would suggest lifting the following restrictions:

- 1) Limiting each person to operating or having financial interest in a max of 1 property;
- 2) Requiring a 1000' buffer between each short-term rental property;
- 3) Creating a cap on licenses at 1% of total housing stock for each unincorporated area;
- 4) Limiting occupancy to 2 people per bedroom and 10 total per property; and
- 5) Requiring a minimum stay length of two nights.

All these restrictions make short term rentals difficult to achieve.

Regards,
Kwixuan Maloof

From: [JESUS RODRIGUEZ](#)
To: [BL Public Comment](#)
Subject: Distance between properties
Date: Wednesday, May 11, 2022 12:19:23 PM

I think the requirements "Short-term rentals must establish a minimum distance of 660 feet between any residential units" it's very difficult to comply in many cities of the county.

From: [Lee Ching Huang](#)
To: [BL Public Comment](#)
Subject: short term rental
Date: Wednesday, May 11, 2022 10:47:32 PM

Dear Sir or Madam:

I am an owner and retiring depending on the rental income because of inflation rate is going up and I couldn't live without this short-term rental income so I am writing this letter and hope you can help and support me for the new regulation and restriction to owner because I don't want to sell my house and become homeless and ask help with welfare department to have a peace of mind safe happy life.

Thank you so much your support is much appreciated and important.

Lee Huang

From: [Tiann Wong](#)
To: [BL Public Comment](#)
Subject: STR in Las Vegas
Date: Thursday, May 12, 2022 7:16:06 AM

To Whom It May Concern,

I am an advocate for short term rentals. I am a real estate broker who sell and own several STR properties myself. I think we are punishing the wrong individuals, property owners. We should have stricter rules along with fines for the host. There are hosts out there who do not abide by the rules and do not filter the kind of guests that stay in the properties. Which results in guests who wreak havoc. Most STR's are ran by a host that is not the home owner.

The proposed ordinance are too strict. I am advocating the city to follow suite of what ordinances City of Henderson has.



Tiann Wong
Broker | B.1002408LLC

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From: [Steve Settlage](#)
To: [BL Public Comment](#)
Subject: New short term rental ordinances
Date: Thursday, May 12, 2022 10:54:34 AM

Jordan,

First of all, thank you for the enormous task of running the government. It must be an extremely busy and stressful job that only a very few can do and I appreciate you taking up the task.

I am sending this email regarding your proposed changes in the short term rental laws in LV.

I am a licensed short term rental landlord. We run a tight ship and make sure there are no parties and no high noise levels etc. We take pride of ownership in our property and believe it has increased the value of the neighborhood.

From my limited experience and in my humble opinion we have rented to many LV visitors that did not want to or could not stay at the casinos. The visitors still spent money on the various entertainments in LV. It seems to me that the small owner short term rentals contribute strongly to the LV economy.

For these reasons, I ask you not to pass the new legislation for Short Term Rentals. If you have any questions feel free to contact me.

Thank you,

Steve Settlage
818-371-9814

From: [Shark Patrol](#)
To: [BL Public Comment](#)
Subject: I FAVOR & SUPPORT Short Term Rentals in Las Vegas
Date: Thursday, May 12, 2022 11:40:52 AM

For Public Comment:

I SUPPORT fair short term rentals in Las Vegas. I use them myself throughout my travels around the USA and in foreign countries and would not be surprised to find out if a huge amount of Las Vegans also have used or tried them or are considering them.

We are responsible guests that abide by all landlord rules and hope to be treated fairly by the city to offer the same of any parties desiring to be hosts.

We have many friends that want to continue to visit Las Vegas and would like their own short term rental home, with a private pool for times when it is not convenient to use a hotel.

PLEASE adopt fair short term rental rules and allow our city the opportunity to earn the additional tax revenue that is often so badly needed for police and maintenance, etc.

Very Sincerely,
Dave Mathers

From: [Wendy Cherrington](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:12:12 PM

Dear Clark [County Officials,

I have properties with more than 5 bedrooms and larger than 5000 sqft. Changing the limit to 14 guests would help as I have a 7 bedroom home large enough to safely and comfortably host 2 guests per bedroom.

I also have septic sewer and I am willing to pay to convert this to the county public sewer which will also help save water! It's very costly but I will pay if this conversion can allow me to get an STR license.

Thank you!

Regards,
Wendy Cherrington

From: [Arthur Ari](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:12:13 PM

Dear Clark [County Officials,

Dear Clark county officials.

I have been a host for five years I have never had any issues at my property we absolutely do not allow parties at my house.

I am a Super Host dedicated Las Vegas prod resident having an extra income allowed me to have a better quality life and send my children to better school, also I employed seven different individuals I have cameras and the noise detections install it my house.

Please please please make short term available in Las Vegas.

Regards,
Arthur Ari

From: [Paul Nova](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:13:13 PM

Dear Clark [County Officials,

Please reconsider the following:

- The limit for the short term rental properties to 3.
- The buffer between each short term. Other counties, like Henderson, are using 600ft.
- The occupancy of 2 guests rule, can be modified to Henderson's regulations. 4 guests on the first room and then 2 per room. With no limit.
- The cap of licenses at 1% is too low, just think that many families came to Vegas from California, Utha, NY, Hawaii, etc to visit Lake Las Vegas, The Dam, Hover Dam, museums, etc. Las Vegas is not anymore only to visit, the non family oriented, Strip. The county on this case should provide a safe and good accommodation for Families and groups that are looking for something different and a hotel can not supply their needs, people travel with babies, kids, etc.

With the proper technology used is easy to control the guest inside and outside the house.

Thank you very much.

Paul

Regards,
Paul Nova

From: [William Hayes](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:14:10 PM

Dear Clark [County Officials,

Please do not set limitations on our vacation rentals.

Regards,
William Hayes

From: [Kwixuan Maloof](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:15:12 PM

Dear Clark [County Officials,

Please don't let the billionaire hotel industry pull your chains and make you their puppets. It's the hotel industry and not the homeowners who are making the most opposition in short term rentals (STR's).

Short term rentals are safe and good for the community. I am sure Neighbors would rather have a short term rentals in the neighborhood rather than a vacant unit which attracts crime, homeless, substance users and squatters.

Short term rentals brings life to a vacant unit and additional tax revenue which provides for better schools, better roads, and better equipped first responders.

Please lift all restrictions on STR's and make Las Vegas affordable for everyone.

Regards,
Kwixuan Maloof

From: [Natalie Velek](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:16:23 PM

Dear Clark [County Officials,

I am very concerned about the proposed bill concerning short term rentals in Unincorporated Clark County. I personally have traveled the world using short term rentals the past 20 years. Whether it be with family, friends and for business. I enjoy the space, amenities that they offer compared to hotels. I feel like I can relax and enjoy the neighborhoods and local establishments versus all the tourist traps.

I have had short term rentals and monthly rentals for over 9 years. One in Las Vegas and one in Maine. I have met wonderful people, and enjoyed sharing the areas with them and families and friends. Personally, in that time frame I have had one issue with a tenant leaving the house damaged. Never had any neighbors complain, in fact most have asked if I need help when I am not in residence.

I feel that owners of STR keep their homes up better than long term renters or some homeowners!

They want to make a good impression on their guests. I also have not had any issues with other rentals on my street. They have all been respectful of the neighborhood. I think the constant negativity of STR comes from people hopping on the bandwagon " I don't want that in my backyard ".

Many rentals help pay people's mortgages, expenses, especially home shares. Many individuals that cannot work, retired individuals need the extra income to help them stay in their homes.

STR help the economy, they bring in more families and business travelers that want the amenities of a home. They spend money in the local economy, car rentals, food, entertainment, concerts etc...

Plus you have many small businesses that depend on STR to keep them in business. Cleaning companies, property managers, maintenance, yard, pool companies.

I am in support of regulations of STR, but the ones proposed are extremely overreaching.

The report of all rental information, stays, names of tenants required to be sent by platforms. Putting signage on a home that it is a STR, that is just advertising that it might be a vacant home at times! Definitely a safety issue.

The lottery system is also a huge concern, a applicant can jump through all the hoops, think they did everything right and then not be notified that there was an error on their application?? Without opportunity to correct it.

The fee is high. Some residences have 4 bedrooms, but only rent out 2, \$1500 a year is extremely high for those situations.

30 min response time is extreme. In 9 years I have been able to get back to guests in a timely manner and solve any issues.

I would be in agreement with the following:

Apply for permit, 1st come 1st serve based on application date.

Safety inspection of the home.

Fee for permit

Submitting taxes monthly

Commercial insurance of 1 million

Max occupancy rules

Then IF there is a issue, the permit can be revoked .

No large party homes.

I feel that this bill will hurt allot of small business owners in the County. Homeowners should have property rights within reason to use their home as they see fit. As I mentioned above I am fine with a permit system and paying taxes. But this bill and how permits are being approved is highly restricted. At this point you might as well just keep them banned.

Regards,

Natalie Velek

From: [Stephane Krief](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Thursday, May 12, 2022 2:17:07 PM

Dear Clark [County Officials,

We have been legally operating our home paying thousands of dollars in transient taxes and depend on this income to feed our families. Our business model has been based on the regulations and guidelines provided as well as insuring a peaceful environment for our neighbors. We would be greatly affected by changes such as reduced occupancy. We urge and plead that you reconsider changing the current model and instead target the problematic operators that are causing these changes to be considered. We are not a competitor to the casino industry. We host families that would otherwise need 3 rooms in a hotel and would never come to the city. We believe we are a significant contributor to more visitors and that the need for short term rentals is real. Thank you for your consideration.

Regards,
Stephane Krief

From: [Ted Pallach](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Friday, May 13, 2022 7:31:52 AM

Dear Clark [County Officials,

When I purchased my property I was not able to get a loan because it was designated "Condo Hotel". This should remove it from the discussion concerning Short Term Rental.

In addition I don't think that there should be a
1,000 ft. buffer between STRs and a 2,500 ft. buffer from casinos.

Also, there should be no maximum number of STRs set at 1% of the housing units in an area.
Again, this complex is a Condo Hotel.

There should be no prohibition. Give all property owners equal opportunity to economic opportunity

I don't think there should be restrictions on STRs in multi-family properties (e.g. limits in condos and no STRs by renters).

Regards,
Ted Pallach

From: [Kathryn Christensen](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Friday, May 13, 2022 7:32:52 AM

Dear Clark [County Officials,

* I do not agree with having a limit of only one property per owner. I do think owners should be personally involved with their properties if they are individually owned, but they can monitor more than one easily. THERE SHOULD BE A DESIGNATION FOR PROPERTIES THAT ARE RUN BY A LICENSED PROPERTY MANAGEMENT COMPANY , vs those managed by individual owners.

* Some buffer makes sense, but there needs to be separate designations for apartments/ condo's/ separate homes.

*There is absolutely nothing unsafe with having bunk beds, or multiple beds in one room. Also, vacation rentals are ideal for families --allowance. should be made for infants/ small children. It makes more sense to use square footage of the home. as the gage for number of people allowed. 2 people allowed for each 200 or 300 sq ft. Again, total number people allowed in a. property should be tied to the square footage of the property. To only allow 10 people in a 5000 or 6000 sq. ft property is ridiculous.

Obviously there does need to be cut offs.

*You can keep fighting what is, and losing tax dollars, or come up with decent regulations that can actually be monitored, or try this 1% cut off. How many eons ago did. New York City, San. Francisco. "outlaw", and. then overly regulate vacation rentals? 15 years ago. Do. you travel? With family? Have you looked on Airbnb and Vrbo in those cities? I guess if you want to keep losing tax money and fighting what is, go ahead. You can't put the genie back in the bottle, even if. you want to pretend you can. There. is not a better. way to travel for families. At the same time, there is plenty of couple and 2-person travel, especially here in Vegas to support the hotel industry.

Regards,
Kathryn Christensen

From: [Joseph Nguyen](#)
To: [BL Public Comment](#)
Subject: Short term rentals
Date: Friday, May 13, 2022 1:24:11 PM

Commissioner Sandeck. I just wanted to express my gratitude to your department in adopting laws that will ultimately legalize short term rentals in the Las Vegas valley. I believe, however, that the mandates in the proposed draft for Clark county is a bit too restrictive. It should be, respectfully, more like the guidelines proposed by the state. Please have the separation between rentals to be no more than 660 feet and make the application process be on a first come first serve basis. It should be a, "you snooze you lose" process... I have 3 properties between my family and I that I would like to get permitted to do business legally. We have taken all the necessary steps to stay within the parameters that were set forth by your department. We've taken and passed the str course, equipped our homes with the necessary noise and video systems, but it seems virtually impossible for us to get licensed in the proposed "lotto" process. Short term rentals have a very significant positive impact on our economy. It brings families with children that otherwise would not be able to come to our great city... Please do not crush this much needed industry. Hotels are, and always have been, teetering around the 90th percentile in bookings. Short term rentals only make up a fraction of the guests here in town. Let's approve as many applications as we can. Please... Those that run there businesses poorly should get penalized accordingly, much like that of a drivers license. Hand out tickets, suspend licenses, and ultimately revoke licenses indefinitely for those that operate poorly. Not all strs are bad... The industry definitely needs to be cleaned up, obviously, but lets not paint the whole industry with a negative broad stroke. It's just not true! Short term rentals bring good red blooded American families together. It brings much needed money to our valley. Restaurants, local business, and even hotels benefit from the traffic they bring to our town. I don't know of any str renter that doesn't go to the strip at least once during there stay. I implore you to reconsider the current draft of the county ordinances. It's simply too restrictive... Thanks for your consideration...

From: [JOHN NGUYEN](#)
To: [BL Public Comment](#)
Subject: Letter Concerning Short-Term Rentals in Clark County
Date: Friday, May 13, 2022 2:21:52 PM

Dear Commissioner Sandeck,

First, I would like to say thank you for your time and thank you to all Clark County Commissioners for moving forward with legalizing short term rentals. I'm truly looking forward to the day when Las Vegas is considered the most modern city in the world in design and in thought. Unfortunately, I don't think we can reach the latter, after reading the proposed mandates that are to govern short-term rentals in our great county. I believe they are way too restrictive and make it virtually impossible for potential hosts to get licensed and legally operate a successful rental. I believe that an idea of running a small rental business in a residential community can happen. I understand that there are a few bad apples in the industry, like in any industry. I say get rid of them and let the good operators flourish. Let's not get hasty and let a few bad apples spoil the lot. Like in any business, owners and operators want to protect their business and would do anything to keep their business running smooth. With the right regulations, I'm sure all hosts would be more than willing to walk the fine line set forth by the County. In order to get to that point, we must allow for most, if not all, applicants to be seriously considered for licensing. The 660 distance separation is too much. I don't think having a few STR's in any one neighborhood would destroy the fabric of the community. That's backwards thinking. The Lotto system of choosing who gets and doesn't get a license is unfair and will not work towards getting operators from not operating illegally. Lastly, I own a 7 bedroom house that I would like to get licensed and think that the 10 person maximum capacity will not work for owners with big houses. Lastly, I would like to say thank you again for your time and I hope you please take my suggestions in forming your decisions. Making Las Vegas the City of the Future starts today and it starts with all of us.

Sincerely,
John Nguyen

From: [Elaine Hansen](#)
To: [BL Public Comment](#)
Subject: Short Term Rentals
Date: Friday, May 13, 2022 2:42:11 PM

Hello,

We are owners of a short term rental in the Henderson area. My husband and I have been licensed since 2019. We take pride in our rental and enjoy hosting a variety of people. Our guests range from families here to see family, hike, take in Lake Mead to companies who have employees either doing business or participating in conventions. They all spend their money in our economy.

We are very conscious to adhere to the local laws and make sure our guests do the same. Our property is extremely well kept and has been a great form of additional income for our family. In addition, we paid the City of Henderson roughly \$11,000 in fees and transient lodging taxes on our stays. That is just one property which shows what the county can generate by making short term rentals legal yet without excessive fees.

It is our earnest belief that the county will benefit from the revenue generated by short term rentals. We urge you to look at ways to go after those who are not adhering to the laws and keep in mind that there are many of us owners who DO follow the laws and go above and beyond to make our guests follow the rules and enjoy their stay in our local community.

Though Clark County has many hotels, please keep in mind many of our guests stay for a longer amount of time and do not want to be in a hotel room. Many of our families are here to visit other family members or are here to work for an extended time.

Coming down on those who are not licensed or do not follow the laws is the right thing to focus on, and let other "mom and pop" owners who ARE doing the right thing run their homes without excessive fees.

We also feel the first come first served for licences is a better route than a lottery system. Though we do not currently have a short term rental outside of Henderson we do understand how they work and feel Henderson has set a very good precedent.

Thank you for your time,

Elaine and James Hansen

Elaine Hansen
Broker/Salesperson
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From: [Alees Pabst](#)
To: [BL Public Comment](#)
Subject: Short Term Rental
Date: Saturday, May 14, 2022 3:05:40 AM

Dear Clark County Commissioners and Staff,

Our family bought a townhome in Unincorporated Clark County. As a United States Air Force family, we've been transferred to different states. But our family hoped we could rent our townhome in Vegas and return to live there someday. We heard that hosting through Airbnb wasn't allowed in Las Vegas, so we called the County. The licensing department person said we could get a vacation home license. And the State Real Estate Office said a homeowner could rent out their home for any length of time according to Nevada law, but we should check with our HOA. The CC&Rs only had a fee for landscape maintenance and parking rules, so we considered renting it to guests through Airbnb or HomeAway. When we were stationed at an Air Force Base in Florida, we bought a small condo in an STR resort, which we intended to rent out when we were transferred. And we planned to rent the Vegas townhome to guests until we returned. A neighbor told us we couldn't.

We checked with the Ombudsman's office, and they said that if the CC&Rs didn't prohibit it, we could rent our home to guests for short stays. Then a class in Florida that uses Las Vegas as an example taught us that some areas, like Clark County, had created STR bans. So, we leased the townhome to long-term tenants since our family liked the home and wanted to come back to Las Vegas to be near our extended family.

It's hard to find good tenants for long-term leases. The neighbors said the police were at our Vegas townhome a lot, and the woman tenant moved to a violence shelter while the man destroyed the house (he left a bed covered in blood and surrounded by bloody carpet, and they broke toilets, doors, appliances, and the granite countertop. He urinated on the carpets. There were holes in the walls and broken light fixtures. The plants out back were killed, and he burned the back wall. The townhome was destroyed and filthy). He stopped paying the rent. We finally had to get an expensive eviction. It would have been better if we had left the townhome empty for two years because the damage was terrible. We hired a property manager for the next tenant after repairing the townhome. A year later, the townhome was severely damaged again. But our vacation home in Florida was in great shape because our local manager or we could take care of it after every guest stay. We've never had any short-term guests as loud and damaging as the long-term rental tenants in Las Vegas.

Our family wants us to come back to Vegas, so we kept renting it to long-term tenants and dealing with the damage, hoping the County would change the laws. With the thousands of illegal STRs and schools needing funds, our family thought County officials would realize they needed to end the ban. Then we heard that the State had passed a law that would end the STR ban. We heard about how bad the new law was for hosts and property managers (but the resorts seem to like it. I don't know why because it isn't good for them to have so many rentals not able to pay guest taxes like hotels and legal STRs do. The State and County could get those funds if STRs were permitted).

Now we see that the proposal from the County is worse than that terrible new state law. We're sick about it. Why would we pay good money to join a lottery when we probably won't qualify for a license if we did have the luck of the draw within all the strict regulations? Wasn't the new state law terrible enough? And why would the County make it even more terrible and impossible? Why the lottery? Why should we trust a lottery in Las Vegas? We wouldn't even trust a Florida or an Idaho lottery, but a lottery for a business license in Las Vegas?! And you added more distance separation to the already ridiculous distance of two football fields between STRs? And only two people per bedroom? Why can hotels with less space than our home have four people per bedroom? The guests pay the same tax rate. Why less allowance for STR guests? Is that fair?

This isn't how it's done in Florida, and STR is considered beneficial for our community here. It's a tourism destination. There are hotels that need customers and they're doing fine. Our

Florida County loves getting the guest taxes and license fees. They say they have only a few problems with code violations (and it's not any worse in STRs than it is in hotels and beaches during Spring Break and other holidays, so they don't blame problems on STRs. It's the bad visitors who cause the problems. They license STRs, so they don't have a lot of illegal operators causing problems. We learned how to deal with potential bad guests and don't have issues in our STR resort in Florida like we hear people complain about in Vegas news articles. Even the articles say that only a tiny fraction of STR operators are a problem. But officials are harming all who want to do STR because of the few bad operators. Why not close down the bad operators and let good hosts take care of the STR guests who wish to come to the County? We could host guests well in Las Vegas. There are ways of making sure that the guests follow the rules. Let us try to become licensed and show you that we can run a responsible small business. But we need fair laws and a fair way of getting licensed. We ask for the chance to show you we can do it.

Take our license away from us if we create problems and don't control our guests!

Please don't continue to make it great for illegal hosts but impossible for people who believe in obeying laws.

And why would the County not allow us to rent our townhome because it's an HOA when the Ombudsman again confirmed that Nevada law still provides for STRs in HOAs if the CC&Rs don't prohibit renting the home? They said that the new state law wrongly contradicts or conflicts with current laws so that it won't be supported by officials. But we see the ban against STR in HOAs in the County proposal. Why would lawmakers not change the old law if it was the best thing to do before adding that paragraph to the bill? And shouldn't it apply to all HOAs in the State and not just Clark County? As the Ombudsman's office pointed out, it isn't fair for Clark County HOA homeowners to be prohibited from STR when the rest of the State doesn't have to work within the new state law? So, the existing law only protects homeowners not living in Clark County? HOA homeowners' rights are only taken away in Clark County?

Our home is in an HOA that would welcome STRs because there are too many homes being destroyed by long-term renters to the point where it's getting run down in several areas. It was a nice neighborhood. We have family in Las Vegas who would take care of our short-term rental and respond immediately to any concerns. We planned to employ my sister's friend, a single mom, to personally check in guests and clean it after their stays. We would hire someone to take care of the yard. These people would gain suitable employment from us and others that they won't have if there aren't short-term rentals for them to work in (long-term rentals don't need these services). Some businesses aren't reopening. The pandemic has been extremely hard on people in Vegas, and it isn't over yet. Why would the County hurt local families who are just trying to work and take care of their homes?

Our family wants us to move back to Vegas and have a house to move into when we return. If it were a short-term rental, we would visit our family more often since we don't have room to stay with them when we come and could use our home (but we can't when it is rented long-term to someone who is destroying it).

The County talks about affordable housing. Why would the County make homeowners rent to people who destroy our homes (protected by tenant laws and government mandates)? And there are still plenty of places to rent that are vacant in Las Vegas (maybe because renters have destroyed the apartments and small homes, and landlords can't afford to fix them because of the government's moratorium on evictions. But plenty of places are still available for rent). We shouldn't be required to have to rent to tenants our property manager can't control while we serve our Country elsewhere. We probably couldn't afford to buy another home in Las Vegas if we sold this one. And our HOA and neighbors would want a good owner running an STR rather than bad tenants not taking good care of the home. Why would the State and County take away our rights when we bought a house within an HOA that allows for STR? Don't those of us serving in the military deserve to have affordable housing when we return home? If we can't STR our home in Vegas until we can live in it, we probably won't try to return to Las Vegas. Our family can't keep spending money fixing the home because of bad long-term tenants.

Short-term rental guests won't come to Vegas if they can't stay in STRs. They aren't the same as hotel guests. Maybe they'll just skip Vegas and go to an STR in Florida or some other area that allows for them to have more space and a kitchen they can use rather than a hotel room. Or they'll keep staying in the County's illegal STRs. Guests don't know the difference, and Airbnb will still broker reservations for any guests (they keep allowing reservations from proven bad guests because they don't want to lose a single reservation, so why would they be worried about some potential penalties from Clark County? They know how to get around laws).

Affordable housing advocates should be more concerned about the Californians buying up homes, retiring to Vegas, and still driving cars with California license plates. These people are likely using community services. STR guests don't use community services like long-term tenants or retirees. STR guests support casinos, sports venues, and local grocery stores. And visitors should pay guest taxes, but illegal businesses don't have the ability or will to pay the taxes.

Your STR ban (and the government's eviction moratorium) hurt homeowners like us. Don't hurt our family even more by passing a County law that makes it so impractical and impossible to run a legal STR that we have to sell a home that we want to move into after our service. Our family and extended family ask our Clark County Commissioners to understand the need to allow for enough licensed STRs for guests who need or want this option and for homeowners to be able to use our home responsibly and according to our rights within reasonable laws. We should be able to run a compliant small business in our house (like many people who have been running other businesses in their homes, especially during COVID-19 closures). Please understand that we will take good care of the home and the guests. We know how to rent to guests who will obey rules and laws. And we will obey reasonable laws, too. We haven't broken laws and won't do so. We're serving our Country and ask that we be treated with honor and fairness. Please help us to be able to keep the townhome in Las Vegas and create a peaceful place for guests to stay in the meantime until we can move to be nearer to family.

Sincerely,

Alees Pabst

From: h Rivney@planetmail.com
To: [BL Public Comment](#)
Subject: In support of Short Term Rentals
Date: Sunday, May 15, 2022 5:28:44 PM

Dear Jordan Sandecki,

As a homeowner I'd like to thank you and the council for your efforts to keep party rental homes out of our neighborhoods. AB 363 is needed so short term rentals are not nuisances that ruin a neighborhood. Sadly, a few bad apples have ruined the reputation of all. There was one in my neighborhood, but I didn't know it until the person actually stopped renting. Not once was it ever a nuisance.

I'm distressed to hear of all the demands placed on the owners of these unincorporated properties. Some of these affect personal livilihoods and don't seem to be relative to the problem you're trying to address. These rules are incongruent with "the American Dream" of owning a business. I've never seen one of these rentals run down or attracting crime, so please reconsider:

Only allowing a person to own ONE property to rent out short term has nothing to do with why they need regulating. Obviously we want to keep this an owner-operated kind of venture, but only allowing ONE property is unrelated to the problem you're trying to fix.

I'd like to think the 660 foot radius between properties is fine. What is the purpose extending it to 1000 feet? This simply puts additional burden on an owner to space out rentals. What if a person owned two units in one condominium tower? I don't see how this solves the problem of unruly guests disturbing a neighborhood.

The reduction in occupancy is a valid concern, but AB363 allows a maximum of 16 guests. Some of the grand homes in Las Vegas are rented for family reunions and other small gatherings. Big homes shouldn't be unduly restricted to guests because that is their function - giving people a place OTHER than the Strip and Downtown properties, which are frankly NOT family friendly. Sixteen sounds like a lot on paper, but in a five bedroom house, it's not unreasonable to expect four families to add up to 16 very quickly.

We are the hospitality capital of the world, are we not? We are a vacation destination just like many other municipalities around the world. It would be ashame to restrict this right out of business. Please reconsider your positions on some of these details.

Respectfully, Holly Rivney

From: [Huseyin Polat](#)
To: [BL Public Comment](#)
Subject: I positively support STR
Date: Sunday, May 15, 2022 6:04:51 PM

Hello Commissioner

Thank you for adopting an ordinance to make STRs legal in Las Vegas, I do believe city like Las Vegas needs to offer alternatives to families, disabled, kids friendly homes for rent short term,. Definitely, not for party homes.

If you consider allowing each person to have couple listings as a limit, city will greatly benefit of the diversity. Please don't be pressured by hotels to make this as strict as possible, think about locals and listen to your heart when making decisions.

Thank you

Huseyin Polat

From: [christine xie](#)
To: [BL Public Comment](#)
Subject: Clark County STR AB363
Date: Sunday, May 15, 2022 7:52:53 PM

To whom it may concern,

Hello, I am a host of STR. I am a small business homeowner trying to run a small business during this difficult time of bad inflation and high prices. STR is the extra income we need to make to support our family, and we want to pay tax to support our county as well. And we all try to be good neighbors while doing this as well.

But the new upcoming law for STR in Clark country is hurting the small business owners try to run this business. I have several opinions and ideas on the new law.

1. 1000 sq feet rule is limiting and restricts the possibility of STR. 660 sq feet is better and will open up more possibilities.
2. I suggest that one homeowner should have the choice to hold up to 5 STR properties.
3. From July 1st, I suggest to use a grandfather in method for STR application instead of lottery.

Thank you.

Kind regards,
Christine Xie
yanyixie@yahoo.com

From: [James Connelly](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Monday, May 16, 2022 7:51:32 AM

Dear Clark [County Officials,

Dear Clark County Officials - I'm writing to voice my concerns on your proposed Short-Term Rental regulations. I enjoy visiting Clark County, however I do not always enjoy staying a resort and hotel/motel. These lodgings drive up prices and have surcharges masked as "resort" fees. Also, short-term rentals generally provide a quieter space to relax when I'm on vacation. I believe there are unnecessary components of this proposal, such as the 1000' buffer between property, operation of only 1 property, and a maximum of a 2 night stay. Better housing policies should be the first step in improving the housing shortages in Clark County.

Regards,
James Connelly

From: [Qing He](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Monday, May 16, 2022 7:52:36 AM

Dear Clark [County Officials,

Hi,

I am strongly against all these restrictions below.

especially, these two items

**Limiting occupancy to 2 people per bedroom and 10 total per property;

**Requiring a minimum stay length of two nights.

I will have no choice, just sell my property in clark county, th county will loss tax income.

Best Regards

David He
cell 317 748 8098

Erase this Limiting each person to operating or having financial interest in a max of 1 property;

Requiring a 1000' buffer between each short-term rental property;

Creating a cap on licenses at 1% of total housing stock for each unincorporated area;

Limiting occupancy to 2 people per bedroom and 10 total per property; and

Requiring a minimum stay length of two nights.and type your feedback here.

Regards,
Qing He

From: [Demetria Kalfas-Gordon](#)
To: [Ross Miller](#); [BL Public Comment](#); [Michael Naft](#); [William McCurdy](#); [Tick Segerblom](#); [Justin Jones](#); [James.Gibson@clarkcountynv.gov](#)
Subject: I positively support STR - upcoming STR Ordinance
Date: Monday, May 16, 2022 8:00:41 AM

Good morning.

I am addressing all the Clark County commissioners as I am a property manager who manages STR's in the Clark County area. I feel that the new ordinances being proposed are too restrictive and should follow more of the guidelines proposed by the state.

The opposition insists that STR's are bad for their neighborhood - why? They bring in revenue to the property owner, they pay taxes to the county, they offer alternatives to hotels for many who don't want to stay in a hotel and they don't generate extra noise, etc. like they are claiming. The minority who do have parties and disregard neighbors should be violated and fined but please do not allow the few to create a law that punishes the majority of owners & guests who follow the law. Those same individuals that do not care about the law now, will continue to disregard it when the new ordinance takes place - go after those individuals/properties heavily by all means.

My clients are serving a need that is out there and there are not enough properties available now for the demand of people coming in looking for short term rentals. Our clients are people coming in to visit families, work, etc. and don't want to stay on the strip - they would rather stay in a house, condo and take care of their business quietly and enjoy being in private facilities without having to deal with traffic, strip noise, etc where the real parties are at.

Limiting the STR Licensing to one per person is not right - there are responsible investors who are out here who want to do the right thing and have the means to do that - why would we limit it to one individual license when that is not the case for any business? What is the difference with an investor buying a property for a long term rental vs a short-term rental? If they are responsible and follow the law, there should be no maximum amount of licenses they can obtain - there is no other ordinance that limits an individual from having multiple business licenses nor any other municipality that has passed STR laws put that in place.

As to the 1000' distance - surely in this community where houses are packed on top of each other, having an STR by a responsible owner even next door to each other shouldn't cause a problem. We don't limit rentals in neighborhoods and the 660' proposed by the state is far enough away to be acceptable. What purpose does the extra 400' gain in restricting them if they are law abiding and don't have the noise/disturbance factor?

As an individual business owner that manages STR's for my owners, if more restrictions are put in place then AB363 advises, my group's income will seriously be affected as well as the guests availability of properties when they come to Las Vegas. Our guests are normally:

- 1) Companies that want to rent a house because it is more reasonable for them to house 3 individuals in a house vs 3 hotel rooms, they also have someplace to have their tools be safe, they can relax in a house setting after a day's work without worrying about noise levels to keep them up after a hard day's work. No one wants to traipse through a hotel after working all day and deal with all the people and not have the ability to cook a meal or just have some peace & quiet.
- 2) Grandparents who want to come in to be available for the birth of their grandchild and want

to be close by where their kids live.

3) Travel nurses who are coming in for a short-stay to alleviate our health crisis needs.

and many more examples of exactly the same - hard working individuals who are here for a purpose and need somewhere quite and homey to stay in, somewhere they can cook a meal, relax and enjoy their time.

None of these people are partiers, they don't make excessive noise and just want to be in a safe & quiet neighborhood. Don't vote and make it impossible for these people to enjoy their time in Las Vegas while creating a revenue for the owners, vendors and all the companies that service the short term rentals as well as Clark County.

Thank you in advance for adopting an ordinance that complies with the state and not making it too restrictive that everyone doesn't benefit.

Have a great day!

Please confirm receipt.

Thank you & Tuck a little happiness into your day...

Sincerely,

Demi

Demetria Kalfas-Gordon

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"Excellence can be attained if you care more than others think is wise, dream more than others think is practical, and expect more than others think is possible." - Author unknown

From: [Brent Lowe](#)
To: [BL Public Comment](#)
Subject: I positively support STR (Short Term Rentals)
Date: Monday, May 16, 2022 8:10:39 AM

Hello Commissioner Sandeck,

I am a property owner in Las Vegas seeking to use my property for short-term vacation rentals. I want to thank you and the other commissioners for adopting an ordinance on short-term rentals, however, I feel that the guidelines are too restrictive, and should go with the guidelines of the state.

Specifically, I ask for the distance separation to be no more than 660 ft apart and to remove the license limitation per person and max 10 people occupancy.

Using my home as a VRBO is my family's lifeline. WE conduct our business professionally and would be really grateful for your consideration to lessen the restrictions.

Thank you,

Brent Lowe

From: [OMYPHRED](#)
To: [BL Public Comment](#)
Cc: MarilynKirkpatrick@ClarkCountyNV.Gov
Subject: I positively support Short Term Rentals in Las Vegas
Date: Monday, May 16, 2022 12:01:53 PM

Short Term Rental properties should be available to travelling tourists in Las Vegas. The proposed ordinance is much too restrictive and will drive out Short Term Rental property owners. Yes, an ordinance is needed, but it should follow the guidelines of the state.

F. R. Moore

Sent with [ProtonMail](#) secure email.

From: [Gloria Discorio](#)
To: [BL Public Comment](#)
Subject: STR rules and ordinances
Date: Monday, May 16, 2022 4:18:30 PM

Good Afternoon,

I am writing this letter to oppose some limits proposed for Short Term Rentals. One being the "lottery" system. This will truly impact my life along with others in shutting down some already established and well functioning business. It will take away our income to provide for my family if not selected. Some of us who are already up, following codes and doing a fabulous job will be crushed. I do agree that ordinances and rules must be made to be sure this new and upcoming business functions with healthy accuracy.

Two I would also like to oppose the "one home" per license. This will also affect my myself along with countless others for most of the same reasons mentioned above. I believe 5 homes per business license is fair

Third I would like to oppose the 1000ft between properties as I feel it is unreasonable. It would also at this time affect my current situation.

I am asking that you please take how you are affecting all ready established well functioning business and families. I think Short Term Rentals done the right way can be a great asset to the State of Nevada. It will bring in much revenue. Please give consideration when making these decisions.

**Thank you for your consideration,
Debra Johnston**

Sent from [Mail](#) for Windows

From: [marisa Liang](#)
To: [BL Public Comment](#)
Subject: I support STR in Las Vegas
Date: Monday, May 16, 2022 6:46:40 PM

To Commissioner,

Thank you for adopting the ordinance for Clark County. I support short term rental in Clark County, I am a frequent guest for short term rental due to my work, it's a home away from home for us when we are in town for weekly project, hotel living isn't ideal for us when it comes to weekly stay and the environment is also not something that we are looking for, I am asking commissioner to remove one license per person guidelines and distances separation 660 ft limit, it wouldn't make sense to limit these if host are quality for all others ordinance and are ready to comply, I am asking commissioner to give equal opportunity for host to operator short term rental not base on # of properties they own or distance. Short term rental is a win-win situation for both hosts and the guests, so I support 100% on short term rental.

Regards,

Marisa Liang

From: [Tina Wu](#)
To: [BL Public Comment](#)
Subject: I support Short Term Rental
Date: Monday, May 16, 2022 11:27:27 PM

Dear Commissioner Sandeck ,

I am in full support of short-term rentals in Las Vegas. I am hoping you will reconsider the current ordinance being proposed. Especially the 1,000 feet between each property would significantly affect the number of homes available for everyone.

Las Vegas is a unique city for my husband and me as this is where we got married a few years ago. We often visit the town to celebrate our anniversary. We used to stay at the hotel on the strip, but after having children, we chose to rent out a home as it is convenient for a family with young children. A home environment is comforting and quiet. It provides a home away from home for our family. It is also easier to travel with extended families to stay close to multiple short-term rental properties. Everyone feels much safer knowing we are all staying close together and not in separate rooms on different floors at a hotel with lots of strangers.

I have seen the growth in Las Vegas. Staying on the strip is no longer the only entertainment for visitors. Staying outside of the strip at a short-term rental provide opportunities to visit national parks and do other fun activities that the city has to offered. Thank you for the work you do. And thank you for making Las Vegas so special for our family.

best,
Tina

From: [Penny Tindall](#)
To: [BL Public Comment](#); [Penny Tindall](#)
Subject: Short term Rentals- Clark County/ Las Vegas NV
Date: Tuesday, May 17, 2022 2:54:43 PM

I have been a resident of Clark County since 1989! I am a local business owner, mother, and also a full time REALTOR. I love our city but am saddened by our Clark County Commissioners along with Assembly woman Rochelle Nguyen. The Bill AB363, a regulating short-term rentals is not fair and misrepresents the facts. I believe Rochell Nguyen and our Clark County Commissions have purposely misrepresenting the facts and concerns for Short-term rentals!

We have a housing shortage, we have “homeless” home owners that sell their home and can not find a rental or another home, this is a CRISIS. Las Vegas is Growing rapidly and as a Realtor my new slogan is Hurray I have a New Buyer, Darn I have a new buyer due to our Shortage!

Some rental owners may need a revenue stream they could not get during covid, if they are licensed they should be able to RENT their property, if they there are issues, they get fined. We are a tourist city, we are having growing pains and our Commissioners need to listen to the citizens

I have stayed in many “vacation rentals” with my family and friends... .they were NOT party houses, if the owners advertise them correctly there is rarely an disturbance. If we regulate we can help our Vegas home owners, and investors continue their income business and Las Vegas can continue to thrive and grow.

The nuisance laws are already written and they apply to all homes, it doesn't matter if it is long term or short term rental or even a owner – occupied home.... We have all had Bad neighbors!

Sincerely
Panagiota P Tindall
Clark County Resident since 1989
Realtor & Publisher.

|

Sent from [Mail](#) for Windows

From: [shirl woods](#)
To: [BL Public Comment](#)
Subject: STR
Date: Tuesday, May 17, 2022 2:55:04 PM

Dear Commissioners

I'm writing because I'm a owner of a License STR for the past 3 years.

I'm enjoyed this business.

There are some heart warming stores to be told but there isn't enough time to tell tell all.

Picture is a family of 5 oldest being 9-11 and family traveling because son is in hockey and has a tournament in Las Vegas what to do so that they can make the trip there seek affordable lodging which was my place they came over and over again this was there home away from home

There are other stories like this

STR aren't for everyone but for

Families like that it was a blessing

I more like that and want to continue to serve those people

Consider this my plea

Thank you

Shirl

Sent from my iPhone

From: [Debra Hansen](#)
To: [BL Public Comment](#)
Subject: New Airbnb regulations will devastate my family
Date: Tuesday, May 17, 2022 4:01:33 PM

Clark County STR ordinance statement

My family does not have a party house. We tent to families who travel to Vegas and who would not come any other way. We have had no complaints!! We cannot afford huge license fees. We nearly lost our businesses due to Covid and have not come close to recovery.

Clark County Commissioners along with Assemblywoman Rochelle Nguyen, the sponsor of AB363, a bill regulating short-term rentals has been knowingly, and methodically misrepresenting facts concerning short-term rentals. To be blunt, Assemblywoman Rochelle Nguyen and the Clark county Commissioners have been what I would call to be criminally negligent in their efforts to purposely misrepresent the facts concerning short-term rentals!

They blame a myriad of problems Clark County has to short-term rentals. They say short-term rentals are a contributing factor to Clark County's housing crisis. Even though if you put every single short-term rental on the market that would represent approximately a 4 to 6 week inventory of houses for sale. They say short-term rentals contribute to the shortage of affordable housing even though hardly any of the short-term rentals fall under what would be considered affordable housing. When Assemblywoman Rochelle Nguyen and Clark County Commissioners describe short-term rentals they repeatedly refer to them as party houses.

Let's take a closer look at that description shall we? Between 97% and 98% of short-term rentals are renting out their houses with absolutely no problems or complaints against them at all. What makes that even more impressive is Clark County's years long campaign against short-term rentals by asking citizens if they suspect their neighbor is renting their property out on a short-term basis to call this hotline. Yet in spite of all Clark County efforts, there's still only a couple hundred complaints. And most of those complaints are only because they're a short-term rental, not because they're disturbing the peace or breaking any nuisance laws. So really the success rate is between 98% and 99%. There are very few industries that can boost that kind of success rate and this is with zero government involvement.

Speaking of nuisance laws, all nuisance laws are already on the books. Nuisance laws applies to all, it doesn't matter if it's a short-term rental or a long-term rental. There doesn't need to be a whole new set of laws just because you're renting a property out for less than 31 days. Nuisance laws should apply equally to long-term and short-term rentals, duration does not matter!

It should be noted that approximately 40% of short-term rentals are home share. It is absolutely ludicrous to even attempt to call a home shared property a party house! Home share is when a homeowner simply rents out a bedroom or two of the property they reside in to earn extra income. This is very popular with retired fixed income senior citizens using their largest asset to earn some extra income or offset expenses, and of course it's not just senior citizens. There's dozens of reasons why people do this and it's always most beneficial for them.

We do need to recognize that there is a couple dozen properties or so that do have problems. The question is how do you deal with those problems. Do you address those specific properties or do you use those properties as a poster child and attack the entire industry? Clearly Clark County is doing the latter. Clark County Commissioners and others are taking these properties and blowing the problems completely out of proportion in order to wage a war against short-term rentals trying to sway public opinion by miss representing facts! If there's a bad short-term rental or short-term rental operator, it should be taken very seriously.

No one wants to live next door to a problem property. Instead, Clark County Commissioners and others are

exploiting these neighbors and using them as pawns and figureheads. These neighbors are so happy because they think Clark County cares about them and their problems not realizing they're just being used.

STR operators are victims. STR operators are being mistreated, misrepresented, demonized, and punished by their own government. All in the name of protecting corporate donors!

We can no longer stand by and watch the government exploit its citizens! We can no longer stand by and allow the government to strip away our civil liberties! It's time we hold the government accountable! Whether it's in the voting booth, or in the courtroom, the government will be held accountable!!!

Please consider your private citizens before you vote in an ordinance that strips us of our right to make an income from our property

Sent from my iPhone

From: [Bryan Henry](#)
To: [BL Public Comment](#)
Subject: str regulations
Date: Tuesday, May 17, 2022 4:02:37 PM

Hi,

What are you guys thinking? Do you have any idea how bad you are hurting us that voted for you. You regulations will be in place in July but you can't get a permit until 2023. So what are we that do this to make income after covid supposed to do?

You are hurting small families in the interest of the hotels that fund your campaigns.

Respectfully disappointed,
Bryan

Sent from my iPhone

From: [Jim Eagan](#)
To: [BL Public Comment](#)
Subject: Short Term Rental Ordinance
Date: Tuesday, May 17, 2022 6:22:56 PM

Good afternoon,

By limiting the licenses to just 1000, there will be significantly more unlicensed short term rental operators who will just keep being a nuisance. As the Vice President of the local Nevada Vacation Rental Professionals, we applaud restrictions that mitigate party houses. The ordinance as it stands will just make more operators "go to ground". Code enforcement will just have more "wacka mole" routines and in the meantime, Clark County is losing millions of dollars.

The idea of removing licenses who are not on municipal water or sewer doesn't make sense either. Long term tenants use as much water or more than short term tenants.

Please adjust the proposed ordinance to offer more licenses.

FYI - If you really wanted to increase inventory for rentals, help get rid of those new laws the prevent us from tossing tenants who don't pay rent.

--

Jim Eagan (USAF Vet)

[Broker / Limestone Investments LLC](#)

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Licenses: [B.1000724.LLC](#), BUSB.0006971.BKR, CAM.0009095-PROV, PM.0164085.BKR

From: [Nakia Woodson](#)
To: [BL Public Comment](#)
Subject: short term rental
Date: Tuesday, May 17, 2022 8:52:19 PM

Hello,

each location that wants to have a short term rental, should simply be charged a fee. plain & simple. It should be a simple one page application. If an air bnb location, gets two complaints they should have to have a class. if they get a 4th complaint then they should get a temporary suspension. There are many good owners/hosts that take care of their home, they are not party houses and do not disturb the neighbors, there should be no limitations.

This will allow the county to make a substantial amount of revenue. As an example the license in NLV is \$975. The license in Las Vegas is approximately \$500. At \$500 per person/location , the county stands to make \$5 million. This proposed ordinance is taking money away from Clark County.

Nakia Woodson, JD; ABR, SRS, SRES,
Luxury and Investing

REALTOR & NOTARY

Compass Realty and
Management LLC

Box 271688

Las Vegas, NV 89127

702-318-1244

****Please write a review**

1) Google

<https://g.page/r/CZRxDqSoO1sYEAq/review>

2) Yelp, search my name

From: justin.beitler.tv
To: [BL Public Comment](#)
Subject: Re: Short term rental unit comment
Date: Tuesday, May 17, 2022 9:30:33 PM

<https://www.lasvegasnevada.gov/News/Blog/Detail/lake-mead-water-shortage>

Lake Mead Water Shortage

In January 2022, Southern Nevada's water allocation was reduced by 7 billion gallons, enough water to serve 45,000 homes.

www.lasvegasnevada.gov

From: justin [beitler.tv](mailto:justin@beitler.tv) <justin@beitler.tv>
Sent: Tuesday, May 17, 2022 9:26 PM
To: PublicCommentCCBL@ClarkCountyNV.gov <PublicCommentCCBL@ClarkCountyNV.gov>
Subject: Short term rental unit comment

Hello,

I am writing to comment on the proposed amendment - "to amend Title 7 by adding new Chapter 7.100 ("Short-term Rental Units")"

One of the proposed amendments is as follows:

"7.100.080. Ineligible Residential Units...(d) the residential unit is not lawfully connected to a municipal wastewater system;"

The above amendment means that any unit which uses a septic system is not eligible for use as a short term rental. Unfortunately, it is extremely expensive to connect most units to the municipal wastewater system, and because no incentives currently exist to aid homeowners in connecting to the municipal wastewater system, this amendment creates an extremely undue burden on any homeowner who has a septic system (as they would be forced to spend large sums of money in order to connect their home to the city sewer and make it eligible for a short term rental permit)

The SNWA is currently exploring pilot programs to help local home owners convert their septic tanks and connect to the city wastewater system, however, until such time as those programs are approved, it will be prohibitively expensive for most owners to convert their

homes and thus they will be unable to participate in short term rentals. These homeowners should not be excluded from the short term rental market while they wait for a sewer connection incentive to be developed.

Please see the Las Vegas government website which states one of the current goals (which has not yet been completed / implemented) is to "Develop a program to help properties using septic systems convert to the municipal sewer system where the wastewater can be reclaimed and safely returned to Lake Mead."

Again, while this program is being developed, this program is not yet available.

Therefore - I suggest that this chapter be modified to allow homeowners with septic systems to initially participate in the short term rental market and only require these homeowners to convert their homes and connect to the municipal wastewater system *after the incentive program becomes available*.

I suggest that section 7.100.080 (d) be updated to read as follows:

"7.100.080. Ineligible Residential Units. The Department shall not issue a Short-Term Rental License permitting the operation of a residential unit as a Short-Term Rental Unit if:...

(d) within 6 months after a program has been developed to aid residents in connecting to the municipal wastewater system the residential unit is not lawfully connected to a municipal wastewater system, that unit shall no longer be eligible for Short Term Rental License permitting;"

Additionally I propose that section 7.100.090 (4) be removed from the application requirements (as this section states that an application requirement is for the owner to send "a copy of the applicant's most recent bill for sewer services;"

Thank you for your consideration.

From: [Ra](#)
To: [BL Public Comment](#)
Subject: STR
Date: Tuesday, May 17, 2022 11:58:05 PM

To whom it may concern

My name is Ronisha Edwards. I just completed the STR Certificate program in hopes of running a legit business. I have a issue of the proposed ordinance because I plan to run a legit business. I want to follow the rules so that STRs are respected as the should be. Over the years there has been a few bad apples but that shouldn't determine STRs fate. There are 150k hotel rooms. We will host the Super Bowl soon. Do we have enough rooms to support ? Vegas is already a tourist city, imagine when Super Bowl Is hosted here. I don't agree with the yearly lottery. Once approved that owner should be able to continue running there legit business. I do not agree with 10 people per house. We have several tourneys hosted here yearly. Teams who travel here will always have an issue with housing their players if they are restricted to 10 people per str.

Sent from my iPhone

From: [beth ellyn rosenthal](#)
To: [BL Public Comment](#)
Subject: Astronomical room rates are why we need short-term rentals
Date: Wednesday, May 18, 2022 8:53:36 AM

County Commissioners:

I sent you a comment yesterday about hotel pricing and how short-term rental pricing helps the not super rich visit Vegas.

Then there was an article in today's RJ Business Section: EDC has room rates surging.

This is exactly why this city needs short-term rentals. Only the rich can afford those prices. The economics of STRs, however, work for us working folk.

((hugs)) BETH Ellyn

--

Beth Ellyn Rosenthal
YOUR Las Vegas Real Estate Concierge
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Property Management Permit: PM.0165529.DES
eXp Realty, LLC.



Mobile: 702-324-6911

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or via a telephone call to a trusted and verified phone number. NEVER wire money without double-checking that the wiring instructions are correct.

*"You always win when you do the right thing ...
... even if the victory isn't pretty." Carolyn Hax*

From: [ronald baker](#)
To: [BL Public Comment](#)
Subject: Re: Response to New Short Term Rentals Proposed Codes/Laws
Date: Wednesday, May 18, 2022 9:44:53 AM

Dear Jordan Sandeck,

Sir, I was using voice recognition and didn't review before sending here is a revised statement and request:

I replied to these proposed code changes earlier and want to add to my comments...

I am a disabled veteran who uses rental of my residence to supplement my income since I no longer work. There should be no legislation or codes preventing rental of my residence and finding me for the proper use of residential property... rental of my residence is not a business and is not operating a business in my home. I believe the state and city are taking advantage of their elected powers to prevent residential owners from earning income on their home... I reiterate that this is not operating a business it is rental of residence for the purpose that any residents is used for... It does not require changing the use of residential property to a different category.

I believe that elected officials should support the person and people who elect them not the business owners who are pressuring those officials to prevent short-term rental of residential property. Please support those who elected you.

Taxing my residential rental income on top of paying federal income tax on that income, as well as having to pay property tax on the property's value is taxation without representation... You are making egregious codes that I believe are excessive and not doing your job of working for me the voter. I will closely review the platform of any politician who is running for office and vote against those who are not supporting my values, needs, and the needs of the American people.

Also, the requirement to have homeowners insurance with an "additional insured" listed as the city has cost me too much. I was forced to get commercial insurance versus residential homeowners insurance. My original insurance would not list the city as an additional insured and do not understand why a city would be listed that way, so I was forced to get insurance that was triple the cost.

Please remove the requirement to list the city on the insurance policy.

The city's proposed legislation is not in compliance with Assembly Bill 363 (AB 363) from the 2021 Nevada State Legislative Session. AB 363 requires Clark County to repeal its longstanding prohibition on the use of short-term rental properties in residential neighborhoods and instead adopt and enforce an ordinance allowing for the rental of a residential unit or a room within a residential unit for the purposes of transient lodging.

V/r Ron Baker
702-626-7554

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From: ronald baker <ronlbaker69@gmail.com>

Sent: Wednesday, May 18, 2022 9:17:31 AM

To: PublicCommentCCBL@ClarkCountyNV.gov <PublicCommentCCBL@ClarkCountyNV.gov>

Subject: Response to New Short Term Rentals Proposed Codes/Laws

Dear Jordan Sandecki,

I replied to this proposed code changes earlier and want to add to my comments...

I am a disabled veteran who uses rental of my residence to supplement my income since I no longer work. There should be no legislation or codes preventing and finding me for rental of my residence... That is not a business it is rental of my residence not operating a business in my home and I believe the state and city are taking advantage of their elected powers to prevent residential owners from earning income on their residents... I reiterate that this is not operating a business it is rental of residence for the purpose that any residents is used for not requiring changing the use to a different category.

I believe that the elected officials should support the person and people who elect them not the business owners who are pressuring those officials to prevent short-term rental of residential property. Please support those who elect you not the businesses.

Taxing my residential rental income on top of my pain federal income tax on that income and property tax on the properties value is taxation without representation... You are making egregious codes that I believe are excessive and not doing your job of working for me the voter. I will closely review the platform of any politician who is running for office and vote against those who are not supporting my values needs and the American people.

The requirement to have homeowners insurance with an "additional insured" listed as the city has cost me over double the cost of insurance because I was forced to get commercial Insurance versus the normal residential homeowners insurance...because my original and many other insurance companies will not list the city as an additional insured and do not understand why a city would be listed that way.

Please remove the requirement to list the city on the insurance policy.

The city's proposed legislation is not in compliance with Assembly Bill 363 (AB 363) from the 2021 Nevada State Legislative Session. AB 363 requires

Clark County to repeal its longstanding prohibition on the use of short-term rental properties in residential neighborhoods and instead adopt and enforce an ordinance allowing for the rental of a residential unit or a room within a residential unit for the purposes of transient lodging.

V/r Ron Baker

From: [Mike Jensen](#)
To: [BL Public Comment](#)
Subject: STR owner comment
Date: Wednesday, May 18, 2022 10:25:27 AM

Good Day, Commissioners,

As a current owner of a STR pushing 18 years (long before Airbnb was even thought of) and with a spotless record to boot in that time, please allow me the time to make a few points regarding **AB363**.

- The best STR is the one nobody knows about, of which there are many.
- My immediate neighbors are wonderful, I have a great rapport with all of them. They come to me at times for help with various questions about their home and whom to call for help. One neighbor used to enjoy meeting my guests and giving them smoked meats as a friendly/welcome gesture. All my neighbors know to call me should anything “wrong” or out of place happen at the home at any given hour. In all my years, I can count on one hand how many times they have called me.
- Not all neighbors are anti-STR
- Most all neighbors (in general) are happy with how STR owners keep up their home, keep it clean, tidy and well landscaped. An STR holds the value of our neighborhoods at a high level unlike long-term rental homes.
- A lottery system will eliminate most long-term owners from obtaining a license that knows the industry well and can benefit the county and help newcomers to the industry.
- Limiting the number of homes (approx. 1000-1500) will not only upset the tourism industry, but there will also be a literal tourism backlash from the world. Many travelers will forgo traveling to Las Vegas if they are unable to stay in a home during their time here.
- I’m confident there will be a downturn in Las Vegas Tourism if the majority of STR’s are put out of business. During high demand times, there will be a percentage of tourists unable to find rooms...or homes.
- I am nearing retirement and would like to hang on to my property for just a couple more years at most. If I fail to obtain a license and subsequently fined for continuing to host guests, it will be extremely detrimental to my retirement.
-

A fine of any amount will be hurtful to any owner since most of us are “mom & pop” and sole proprietors providing honorable and much needed service to the tourism industry.

- The vast majority of all owners are legitimate small businesses and are very much respectful of local laws and how we are perceived by both the city/county, the public and our neighbors. We want to be licensed and want reasonable regulations to abide by and continue operating.
- The current proposed mandates will simply create hardships to current successful and reputable owners.
- We DO NOT make buckets of money as many appear to think is the case. Most of our nightly rates average \$200-400 per night since most homes are 3-4 bedrooms. The length of a typical stay is 4 to 5 nights. Longer stays in summer time.
- Indeed, there are a few bad apples and “party homes”, most of these homes/owners are well known by the county & city. They have been asked several times to cease & desist and even fined heavily; however, they keep operating with complete disregard for their neighbors or the law. We too, want these bad owners removed & shut down. The county and city needs to get tough with the “bad apples”.

Hopeful mandates imposed by the County

- A reasonable annual license fee of \$800 is acceptable, affordable and fair.
- All owners should be required to take the accredited STR class offered at CSN by Julie Davies prior to obtaining a license to operate in Clark County. Many current owners have this certificate from taking her class. This must be a requirement especially for any new owner pivoting to operating an STR in Las Vegas.
- All STR owners should have a solid “rental agreement” with specific guidelines required by the county as well as their own general guidelines they prefer to have in place. A well written rental agreement with guest bookings works wonders for keeping guests in line and at the same time advising potential guests this is a serious business and they do not have free reign of your property to do as they please.
- An owner rental or host agreement is paramount at deterring the “bad”

renters coming to Las Vegas for nefarious and “party” reasons.

- Acquiring a driver's license and guest personal info at the time of booking is also a valid requirement in standard operations.
- Owners must impose a “zero-tolerance” policy regarding their home guidelines.
- Owners should have the “noise aware” system in their home alerting the owner when the decibel level has reached a certain level in the home.
- All owners should have exterior security cameras.
- A maximum number of adults should be limited to a specific number of bedrooms in the home. Two per bedroom is sufficient plus additional children. Owners who limit adults will continue to stay successful and avoid potential problems
- Limiting the number of cars is also critical as well as where to park said cars. No parking in front of neighbor’s homes is also helpful and avoids problems. # cars should be the limit.
- Large commercial vehicles such as box trucks, limo’s, party buses, mini-buses etc. should not be allowed. This is a red flag for all neighbors. All trailers must be pre-approved by the owner. Keeping a low profile is the best practice for all.
- Owners must have specific guidelines regarding, quiet hours, swimming pools, hot tubs, trash & recycle collection days, use of garage, neighbor respect, and guest pets.
- Covering all bases with guests is vital to operating a successful STR home. With the proper education, consulting an expert for help with start up, and following proper protocols is the key to a successful STR.

Misc. Thoughts by a successful STR owner

- Having fair mandates & reasonable regulations will keep the STR business in good standing and bring in millions of tax dollars to Clark County & Las Vegas both in the near future and beyond. The stricter the regulations are, the more owners will go underground, and the subsequent “whack-a-mole” scenario begins again and the loss of tax revenue. All good owners want fair regulations.
- The “owner-occupied” home scenario is a “pipe dream” and will not work. Families will not stay in a home that has an owner upstairs or in a separate part

of the home. Families, conventioners, sports people, golfers, couple getting married will not stay in a home with someone currently living in it. People prefer to have their own clean & comfortable space. Think about your own personal travels, would you want to stay in a home that is currently occupied? Ponder the cleanliness of that type of home especially with Covid protocols in place, what about the amenities, will the owner have updated furniture and amenities. Absolutely not.

- Owner occupied homes have “rooms” for rent, not the entire free use of a home. The type of guest utilizing this type of home are generally young singles traveling for school or business, will stay for 1 or two days and then leave.
- The most successful STR is one where the actual owner is “hands-on” and has complete control of his or her property. Any out of state owner cannot react to problems with their home in a timely manner nor continue proper upkeep of the exterior.
- The current proposed bill will scare off and shut down the majority of good owners, will create hardship for good owners as well as the elderly owners that attempt to stay.
- In the current economic situation, putting good people out of work who have scraped and clawed to make a living, will be immediately put out of work. How is this good for the city? How does this move the city forward.
- Listen to the people who have the experience, the people teaching and consulting the new owners. Listen to people such as, Julie Davies, the teacher of the accredited Short Term Rental class, Annette Fiala who runs the VVRA, Vegas Vacation Rental Assoc. These are the people who have fought tirelessly for reasonable regulations for many years.
- Use common sense, weed out the bad and keep the good. This will benefit all including the tourists who will be the big losers as well if this current bill proceeds.

I’m not ready to retire, however, you will be forcing me to do just that. I simply hope I will be able to support myself in doing so and, in turn, forgo having a negative view of all commissioners who make the decisions for the city of Las Vegas.

Thank you,

Mike J

From: [Victor Cabezas](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Wednesday, May 18, 2022 12:09:34 PM

Dear Clark [County Officials,

My name is Victor and I am an Verb Host and I share my home and welcome guests to Clark County. Please protect the rights of residents like me who share their homes to supplement our income. It would be particularly harmful to me if I lost my ability to share my home.

Lords of Clark county .

I am writing to you hoping for your support in the face of so many regulations that you intend to impose on your citizens of Las Vegas that we seek to make STR and we want to regularize ourselves with a fair license for both parties. Me and my family are Democrats and I hope they will be more lenient with us.

Working as a hosted has given me a huge solution to my expenses as a father of a family who is 56 years old and has a part time job.

This has helped me cover expenses that I would not have been able to meet and especially in the midst of a pandemic. I was one of the people who did not apply for unemployment.

Having this STR provides stability to my family and to other families such as the gardener, the pool guy, the housecleaning lady and the maintenance man.

I also think it helps people who can't afford hotels to go on vacation.

My neighbors have had no complaints from my guests because I make them comply with the house rules before accepting their booking, no parties or events and only 2 people per room.

We are living difficult time for everyone because inflation is high and affects American's home , and I think this is a help for us , please keep in mind and help us do the best for US citizen in Las Vegas.

Hosting provides a major economic lifeline for me, my family, and thousands of Clark County residents who depend on income from short-term rentals. Without the ability to host, many of us will face further economic hardship and the uncertainty that comes with it.

With some complicated regulations in AB 363, please find a way to simplify them in a fair way that allows us to easily comply. As draft regulations that will impact us, please support our right to share our homes, and help all people in our community to continue to benefit from the sharing economy.

Thanks for your time.

Regards,
Victor Cabezas

From: [Vineet Seth](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Wednesday, May 18, 2022 12:10:38 PM

Dear Clark [County Officials,

Please ensure all is done to make the fight against the large hotel lobby equitable for us small business owners who can make a fair and decent living through STRs. With closely monitored and fair regulations, the can be a success to both the owners, residents and government of Nevada.

Regards,
Vineet Seth

From: [Jose Rodriguez](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Wednesday, May 18, 2022 12:11:44 PM

This message originated outside Clark County. Please validate sender before taking action on this message. CC4

Dear Clark [County Officials,

As a resident of Clark County, I would like to say that I'm in favor to the Sort Term Rentals properties been regulated. My question is why this business will be imposed with a 1000" buffer between each rental property, many other kind of business don't have this order. Also if a house is larger enough with square footage for more than 10 guest, I don't find any reason why this can't not be regulated in base to this, instead of the rooms at the house, some house may have large open rooms for groups and families to enjoy their vacations or their business trip. Further more STR is a business like any other and why entrepreneurs can have more that one property.

I'm totally in favor to eliminated and suppress party houses, but houses of regular citizens, this can be their own source of income.

Thanks for your attention to this matter.

Regards,
Jose Rodriguez

From: [Lana Nation](#)
To: [BL Public Comment](#)
Subject: Feedback on Proposed Short-Term Rental Regulations
Date: Wednesday, May 18, 2022 12:12:45 PM

Dear Clark [County Officials,

Four of five points make sense and are a very positive move. Limiting to one per person will help stop the flood of rentals on the market. The limits on how many people per bedroom/property and the minimum length stay make good sense.

The licensing cap I'm unsure of.

The 1000' buffer makes ZERO sense. People should not be punished because their neighbour also owns a rental and somehow has the upper hand on the listing process. This item should be banished.

Regards,
Lana Nation

From: [Mandy Huang](#)
To: [BL Public Comment](#)
Subject: I positively support STR (Short Term Rental)
Date: Wednesday, May 18, 2022 12:14:46 PM

Dear County Commissioner Sandeck,

I am in full support of short term rentals in Las Vegas and thank you for adopting an ordinance. I am hoping you will reconsider the current ordinance being proposed as it is very restrictive. Especially the 1,000 feet between each property as this would greatly affect the number of homes available.

I am a previous guest that chose to rent out a home for my family instead of staying at a casino or hotel on the strip. I feel much safer knowing we are all staying together and not in separate rooms on different floors. The location of the homes we need are perfect for when we are in town for personal reasons, such as needing to stay for medical check ups, weddings, and more.

I enjoy staying at short term rentals because we are able to feel at home while being in another city where we can cook meals and be away from the noisiness of staying on the strip in Las Vegas.

There are so many reasons why short term rentals are so important, especially being a previous guest. They provide us a more affordable option especially if we need a place to stay for an extended period of time. Not only that but it is hard to find a place at the last minute for hotel rooms and it ends up having everyone split up to stay at different hotels.

Thank you for your time.

From: [Louis Koorndyk](#)
To: [BL Public Comment](#)
Subject: Clark County STR ordinance statement
Date: Wednesday, May 18, 2022 12:16:34 PM

Clark County STR ordinance statement

My name is Louis Koorndyk. I've been a Clark County resident since 1979. I've seen many Commissioners come and go. Some good, some not so good. It would appear now we have just about the worst of the bunch. Never in my lifetime would I have ever dreamed that I would witness such a methodical well planned out assault against Clark County's citizens, all in the name of protecting their corporate donors and their profits! Clark County's Commissioners are showing a total disregard of the law in its unrelenting assault on Clark County's citizens civil liberties.

Clark County Commissioners along with Assemblywoman Rochelle Nguyen, the sponsor of AB363, a bill regulating short-term rentals have been knowingly, and methodically misrepresenting facts concerning short-term rentals. To be blunt, Assemblywoman Rochelle Nguyen and the Clark County Commissioners have been what I would call to be criminally negligent in their efforts to purposely misrepresent the facts concerning short-term rentals!

They blame a myriad of problems Clark County has to short-term rentals. They say short-term rentals are a contributing factor to Clark County's housing crisis. Even though if you put every single short-term rental on the market that would represent approximately a 4 to 6 week inventory of houses for sale. They say short-term rentals contribute to the shortage of affordable housing even though hardly any of the short-term rentals fall under what would be considered affordable housing.

When Assemblywoman Rochelle Nguyen and Clark County Commissioners describe short-term rentals they repeatedly refer to them as party houses. Let's take a closer look at that description shall we? Between 97% and 98% of short-term rentals are renting out their houses with absolutely no problems or complaints against them at all. What makes that even more impressive is Clark County's years long campaign against short-term rentals by asking citizens that if they suspect their neighbor is renting their property out on a short-term basis to call the County hotline and lodge a complaint. Yet in spite of all Clark County efforts, there's still only a couple hundred "complaints" and most of those complaints are only because they're homes being rented out on a short-term basis, not because they're disturbing the peace or breaking any nuisance laws. So really the success rate of short-term rentals operating with zero issues is between 98% and 99%. There are very few industries that can boast that kind of success rate and this is with zero

government involvement.

Speaking of nuisance laws, let's not forget that all nuisance laws are already on the books. Nuisance laws apply to all, it doesn't matter if it's a short-term rental or a long-term rental or owner-occupied home. There doesn't need to be a whole new set of laws just because you're renting a property out for less than 31 days. Nuisance laws should apply equally to long-term and short-term rentals, duration does not matter!

It should also be noted that approximately 40% of short-term rentals are home-share. It is absolutely ludicrous to even attempt to call a home shared property a party house! Home share is when a homeowner resides in that home and simply rents out a bedroom or two of the property to earn extra income. This is very popular with retired fixed income senior citizens using their largest asset to earn some extra income to offset expenses, and of course it's not just senior citizens. There are dozens of reasons why people do this and it's always most beneficial for them.

Let's take a little closer look at how our Commissioners are protecting their donors at the citizens' expense. On May 5th, KNPR radio interviewed Jacqueline Flores, founder of the Greater Las Vegas Short Term Rental Association and Commissioner Justin Jones. The host was Joe Schoenmann. When Mr. Schoenmann asked Commissioner Justin Jones why he thought it was necessary to have a 2500 foot separation between a short-term rental and a gaming hotel, Justin Jones refused to answer the question. Instead, in true Justin Jones fashion, he pivoted. Instead of answering the question, he said the marijuana industry has distance separations and there's distance separations from those that sell alcohol near gaming hotels so the practice isn't unusual, but that wasn't the question. If Justin Jones answered the question truthfully, there would've been consequences. Of course Justin Jones couldn't say, we put the distant separation there because that's what our corporate donors wants us to do.

KNPR radio with the same host had a radio interview three months earlier. Once again the guests were Jacqueline Flores and this time Commissioner Tick Segerbloom. Tick Segerbloom, however, was a little more honest. He clearly stated on KNPR radio that the hotel industry should be protected because it is the hotel industry that drives our economy. He showed a complete disregard for Clark County's citizens rights to instead protect the hotel industry's profits and the profits of their donors.

We do need to recognize that there is a couple dozen properties or so that do have problems. The question is how do you deal with those problems. Do you address those specific properties or do you use those properties as a poster child and attack

the entire industry? Clearly Clark County is doing the latter. Clark County Commissioners and others are taking these properties and blowing the problems completely out of proportion in order to wage a war against short-term rentals trying to sway public opinion by misrepresenting facts!

If there's a bad short-term rental or short-term rental operator, it should be taken very seriously. No one wants to live next door to a problem property. Instead, Clark County Commissioners and others are exploiting our neighbors and using them as pawns and figureheads. These neighbors are so happy because they think Clark County cares about them and their problems not realizing they're just being used. Think about it, out of all the problems Clark County has, all the projects that are either proposed or need to be done, the projects that are competing for funding and taxpayer dollars—it's a couple dozen neighbors that may have their sleep disturbed, that's where Clark County decided to spend millions of dollars trying to stop short-term rentals. Really? You really don't think there's something much bigger at play here?

STR operators are victims. STR operators are being mistreated, misrepresented, demonized, and punished by their own government. All in the name of protecting corporate donors!

We can no longer stand by and watch the government exploit its citizens! We can no longer stand by and allow the government to strip away our civil liberties! It's time we hold the government accountable! Whether it's in the voting booth, or in the courtroom, the government will be held accountable!!!

*Louis Koorndyk
Greater Las Vegas STR Association
louis@glvstra.org
www.glvstra.org*

From: [Jake Soteris](#)
To: [BL Public Comment](#)
Subject: STR in Las Vegas
Date: Wednesday, May 18, 2022 12:18:11 PM

To whom it may concern,

STR's should be allowed as regular folks should have the ability to benefit from there own homes as they see fit.
Strict regulation only benefit the large casinos and we the people are well aware of the some of the reasons for the overly strict regulations.

I and many of my peers will not be voting for those that serve the corporations and vote for strict regulations for STR.

We only ask that you do what is best for the people

Thank you!

Jake Soteris
eXP Realty
702 376 3643
vegasjakerealestate@gmail.com
www.vegasjakerealestate.com

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From: jdbock2k@yahoo.com
To: [BL Public Comment](#)
Subject: Clark County Short-Term Rental Ordinance & Government Overreach
Date: Wednesday, May 18, 2022 1:08:32 PM

It has come to my attention that the Clark County Commissioners and government leadership intend to make it illegal for citizens to provide for their families and offset living expenses by renting out their homes for short periods of time; that by July 1, 2022, we will be required to have a license to do whatever we want with our own property.

This is unacceptably dangerous and constitutes government overreach at its worst. They will not only be required to acquire a license, but the first will not be awarded until next year. Given the current political and economic situation, most people are already struggling, and this legislation only serves to penalize the common citizen while benefiting the big hotels.

It is obvious that this is solely to protect large hotels, who are major corporate funders to our political candidates. Citizens' rights are no longer protected by our government. It is evident that they are more concerned with a large paycheck and preserving their jobs, where they will continue to exploit folks for personal advantage.

STRs make up a modest percentage of the total housing supply. They have a relatively low percentage of "complaint" properties and give an incentive for families to travel to Las Vegas, where they visit those hotels/casinos and spend money that they would not otherwise be able to afford. People do not visit Las Vegas solely to stay in a short-term rental and do nothing else. They use short-term rentals to offset the cost of a holiday here by taking advantage of the entertainment and cuisine provided by the hotels/casinos.

According to statistics, most STR hosts take good care to keep their properties clean and well maintained, keeping neighboring property values high, are very conscientious of sound levels and don't tolerate delinquent behavior in their homes as it would then devalue their asset and create more headaches than they're worth. It is in their best interest to maintain them as to improve online reviews and promote the health & longevity of this revenue stream. "Bad eggs" are the exception rather than the norm and it is far more common to have delinquent behavior within long-term rentals.

I am strongly opposed to the new ordinance as it unnecessarily restricts us, Clark County citizens, and only seeks to benefit the current monopoly. I will always work to support politicians in office who truly represent the people's will, not their own or their corporate donors.

JD Bock
Clark County Resident

From: [Herman Kayy](#)
To: [BL Public Comment](#)
Subject: STR Ordinance
Date: Wednesday, May 18, 2022 1:58:29 PM

Hello Clark County,

I'm writing in regards to the STR ordinance in place and I really don't believe it's the right move towards home owners currently. I find that a raffle system is very unfair and licenses should instead be rewarded to quality hosts who hasn't had issues with parties or loud noises.

My cleaner and handyman are immigrants who moved to the united states to create a better life for themselves and they rely on our properties to feed their children and family. STR does nothing but bring more tourism and business to Vegas.

Instead of the strict ordinance I instead propose licensing fairly and available to everyone. If a hosts continuously hits the violations fees and potentially loss of license for the calendar year can be put as penalty instead.

I hope you really reconsider the draft ordinance currently thank you

From: [Patti Oyler](#)
To: [BL Public Comment](#)
Subject: Short term vacation rental ordinances
Date: Wednesday, May 18, 2022 2:09:55 PM

By limiting the licenses to just 1000, there will be significantly more unlicensed short term rental operators who will just keep being a nuisance. As the Vice President of the local Nevada Vacation Rental Professionals, we applaud restrictions that mitigate party houses. The ordinance as it stands will just make more operators "go to ground". Code enforcement will just have more "wacka mole" routines and in the meantime, Clark County is losing millions of dollars.

The idea of removing licenses who are not on municipal water or sewer doesn't make sense either. Long term tenants use as much water or more than short term tenants.

From: [Alexander Greschenko](#)
To: [BL Public Comment](#)
Subject: House renting.
Date: Wednesday, May 18, 2022 3:24:04 PM

As an immigrant from former Soviet union, 32 years ago, I always looked up to the United States as a place that inspired me and gave me a sense of protection because of the rights and liberties it offers to people and the protections it has against corrupt, oppressive, and tyrannical government officials which is what people like me faced back in Russia.

When I came to the United States, I was excited and full of hope for my future and that of my family. The sky was the limit! All my dreams could come true! I was going to be able to provide a prosperous future! I knew all that would be possible but I also knew all that would require hard work, perseverance, and sacrifices, all of which I was ready and more than willing to make.

Through hard work, perseverance, and sacrifices I was able to achieve the American Dream and bought my first house. I learned quickly that for an average person in America to achieve financial stability and independence, investing in residential real estate was one great way of doing that so that's what I focused on. I am a musician and dance instructor and through savings and investment I continued to get more into buying homes to offer then as rentals. Again, I was living the American Dream.

However, that American Dream has turned into a nightmare. I have been demonized for simply owning a few homes and renting them short term, and my local Democratic County and Democratic State officials who are supposed to look out for hard working people like me suddenly treated me as a criminal and a bad guy, even issuing me fines of over eighty-thousand dollars (120,000.00\$\$) for simply renting one of my houses for less than 31 days. I have never had any issues or problems at his property. No parties, no loud music, no disruptive behavior, no trash, or cars parking illegally, no health or safety issues with the property at all. In fact, my house is kept in great condition at all times with weekly cleaning service, pool and landscaping maintenance each week, and guests who have always respected the neighborhood and neighbors at all times. Despite all that, my public officials in Clark County fined me!

I do not understand why our Democratic representatives were coming after hard working people like me. We do not disturb our neighborhood or neighbors, we bring tourists to our local community small businesses, we employ our neighbors as housekeepers, cleaners, landscapers, pool cleaners, etc, so instead of seeing the positive we bring to our City and despite not having any issues, they still treat me like a criminal and punished me with their harsh fines and liens placed on my property for no reason whatsoever.

Of course, I know now that the whole reason why our Democratic leaders are treating me as a criminal is not because I had a party house (even though my house has never been a party house), or because there was trash or other nuisance (because there was none), it is simply because they are protecting the corporate profits of the resort hotels who donate to their political campaigns and that's shameful! These public officials claim to care about working Americans and families like mine, but it is evident that they do not. It is evident that Democratic Assemblywoman Rochelle Nguyen doesn't care for struggling people or families or the working class because it was her who created an anti-people and pro-corporate State Bill AB363 which she used to come after hard working families and protect the corporate profits of the resort hotel industry.

Democratic Clark County officials Marilyn Kirkpatrick, Justin Jones, Michael Naft, Tick Sigerbloom, Ross Miller, and William McCurdy II, and James Gibson are all traitors to working class people, struggling Nevadans, and property owners all who are simply trying to create a better future for themselves and their families. Instead, these officials only care about their corporate donors' profits because they do have been treating me and people like me like criminals for simply renting our homes less than 31 days.

These Democratic officials and the Democratic Party as a whole proves today that they are not the party of the little guy. They too are corporate puppets who only care to pass regulations that favor big corporations and punish and deprive economic opportunities for hard working individuals like me.

Thank you.



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May 18, 2022

Clark County Commissioners
500 S Grand Central Pkwy
Las Vegas, NV 89155

Dear Commissioners:

On behalf of the Las Vegas REALTORS® (LVR), we appreciate the opportunity to submit the following written comments concerning the proposed new ordinance regarding Short-Term Residential Rentals (STRs) within unincorporated Clark County. LVR represents over 17,000 members across Southern Nevada.

In general, LVR understands that STRs exist in a place of tension between private property rights and the right to quiet, peaceful enjoyment of one's home. While LVR is the leader in advocating for private property rights, we view this issue as split between the private property rights of an owner to operate a rental out of their home and the right of their neighbors to not have their rights infringed upon as well. Striking a balance between these two tenets is understandably difficult. Furthermore, LVR understands the unique nature of the Las Vegas market in that we offer the most hotel rooms per capita in the nation. Many other communities offer STRs as a way to fulfill a lack of supply of hotel accommodations, but that is not the case in our market. Moreover, LVR understands the concern that an increase in home purchases for STRs can negatively impact the already low housing inventory for buyers that seek to be principal residents.

We do understand there is a smaller segment of visitors to our market that purposefully seek out accommodations beyond that of traditional hotels. Some prefer a quieter environment, some have larger families, and some are looking to move to Southern Nevada and seek to live in residential areas to better understand the community before purchasing. We believe that providing a framework for regulation and enforcement of STRs is a necessary step to protect our neighborhoods, but we also seek to advocate for regulations that are not overly onerous to the point it drives STR operators off the grid or impact STR users that rely on the service for accommodations that don't negatively impact their neighbors.



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LVR understands that Clark County is crafting new ordinance in order to bring current code in line with Assembly Bill 363 (AB363) which was passed during the 2021 Nevada State legislative session. LVR understands the items in the new ordinance that are directly taken from the framework that AB363 provides, however there are a few additional items that LVR would like to bring attention to:

- Title 4, Chapter 4.08, Section 4.08.005, Subsection 4.08.005(35) (b) xvii regarding the categories of units that don't fall under the label of "transient lodging establishment". It says that a room within a private dwelling house or other single-family dwelling unit that is rented to a person for thirty-one consecutive days or more...". LVR recommends changing the language to ensure month-to-month (MTM) rentals are not included in this category. For example: "A room within a private dwelling or other single-family dwelling unit that is rented for a period of less than thirty consecutive calendar days, or, in February, less than twenty-eight consecutive calendar days". The standard month-to-month rental is based on 30 days, and these are common lease forms in property management throughout Clark County.
- Section 7.100.190 regarding complaints. In this section, it requires that a "local representative shall respond to the Short-Term Rental Unit within thirty (30) minutes. The local representative shall thereafter have sixty (60) minutes to resolve the problem giving rise to the complaint". It also includes that a fine will be assessed of \$250 should a County employee or agent of the County be required to report to the STR to help resolve the complaint. LVR believes that the 30-minutes response time is not realistic from a logistical viewpoint, and, in the event of a safety concern, the impacted individual should not engage in-person, but rather contact law enforcement. We instead would suggest a 24-hour window for response and resolution.
- Section 7.100.190 regarding complaints also includes that there will be a 24-hour hotline for citizens to file complaints maintained by the County. Under Section 7.100.170 (d), it states that "the name and contact information of the local representative shall be provided to the Department and shall be provided to any interested person upon request". LVR is concerned that spreading personal information to any interested party (especially given the vague nature of this definition) could open owners to undue harassment. LVR believes that the 24-hour hotline provided by Clark County for complaints regarding STRs is an appropriate and effective avenue for neighbors to voice any complaints or concerns, and Clark County can then contact STR owners directly for resolution.



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Thank you for taking our concerns into consideration. We would welcome any discussion on those issues. If you have any questions, please contact Serena Kasama at serena@carraranv.com or 725-230-8788.

Sincerely,

A handwritten signature in blue ink, appearing to read "BR", with a stylized flourish extending from the end.

Brandon Roberts
2022 LVR President

From: [John Wong](#)
To: [BL Public Comment](#)
Subject: STR ordinance Public Comment
Date: Wednesday, May 18, 2022 3:53:18 PM

Hi my name is John Wong and I live in district F. I am writing this email today to publicly state that you lost my vote for my commissioner Justin Jones as well as the democratic party overall. I cannot support candidates who do not support locals and instead are taking donations and rather represent their corporate donor's interests.

With this drafted and soon to be final short term rental ordinance, it seems to allow operators to host legally and apply for a permit but that is far from the truth. We know how it was designed to fail and how the city plans to taper off the total number of permits issued to hosts as the number eventually dwindles down to virtually zero after a bombardment of unnecessary and nonsensical fines will be issued to hosts due to the restrictive overreaching nature of the ordinance.

Do you really think the public does not see what you are doing? All the smear campaigns of STR operators as being nothing but party homes, when only 1% of those listings are making it a bad name for the rest of us? While the rest of us are being responsible and never received a complaint?

At the time when average people struggle to make ends meet, pay the high cost of living, pay expensive healthcare and prescriptions, send their children off to college, pay the mortgage, save for retirement, supplement their income or in some cases rely on this as the sole source of income, the last things our Democratic County Commissioners and Democratic Leadership at the State level should be doing is deprive property owners the ability to rent their properties short term and only care about the corporate profits of their corporate donors.

When my mom was laid off from her job at the MGM she took one of the spare rooms in her house to list on Airbnb and was able to supplement her lost income. She then went on to list a rental property she owned which had become vacant onto Airbnb which was entirely enough to replace her lost income from her job as a blackjack dealer. She went on to host full time and continues to do so and truly enjoys doing it ever since she was laid off from 2020. She enjoys hearing and reading the reviews and comments about how much of a great time the guests had at her Airbnb and their time on the Las Vegas Strip where they gambled, dined out, and purchased souvenirs. All the memos and stories we all hear about which are in the guestbook that we have for them to fill out. In the meantime, it is now 2022 and she has not received a call for her job back on the Strip. Do you think the casinos really care about her or anyone else they laid off? No. Do I think you as the commissioner care if my mom got her job back? No. She found another way to replace her income while the city did nothing for the greater good of the people during this time and now you want to make it this restrictive and next to impossible to obtain this license? This is a violation of our property rights and you will be killing our economic opportunity for prosperity of our residential property as well as the income of all the people we employ for our properties.

STR operators are victims. STR operators are being mistreated, misrepresented, demonized, and punished by their own government. All in the name of protecting corporate donors.

We can no longer stand by and watch the government exploit its citizens. We can no longer stand by and allow the government to strip away our civil liberties! It's time we hold the government accountable! Whether it's in the voting booth, or in the courtroom, the government will be held accountable.

Warm regards,

John Wong
Sundae Homes
Realtor - Lic S.171443
Cell: 702-882-8859
Email: jwong882@yahoo.com

From: [Serg](#)
To: [BL Public Comment](#)
Subject: Clark County STR
Date: Wednesday, May 18, 2022 4:26:00 PM

I'm reaching out to you not only as an STR owner, but also as a Nevadan, a home owner and a family man. I have 2 houses listed on Airbnb, and those 2 houses have employed and fed me and my family for years.

My wife and I do everything ourselves - we are our own cleaners, maintenance workers, greeters, managers and security.

We have always taken our rentals seriously and handled our operation with great responsibility and respect to our neighbors. We have noise sensors and security cameras installed in both our houses and ALWAYS make sure our guests are quiet and respectful, that they follow our house rules (including our strict "no parties" policy), we ALWAYS make sure they park in the garage or driveway and we take care of trash and appearance of the house more meticulously than most "regular" homeowners. All our neighbors are aware of our family business and have our emergency phone numbers, they know they can call us anytime day or night to take care of literally ANY issue, if there's ever an issue. Thanks to our responsible and respectful approach to STR our relationship with all our neighbors is great, they never have to experience any inconvenience from our operation.

So my question is: why is Clark county trying to make me a villain and an outlaw, and take away my family's main source of income when I'm not creating any problems or inconveniences to anyone?

Why am I being criminalized for simply renting out my house that I own and paid for with my hard earned money? How is that fair?

I guess for officials like Marilyn Kirckpatrick, Justin Jones, Michael Naft, Tick Sigerbloom, Ross Miller, William McCurdy II, and James Gibson, the well-being of my family and thousands of other families like mine are far less important than corporations and hotels who donate to their political campaigns. I'm sorry I don't have millions of dollars to "donate" to your campaigns (I'm using quotes because we all know that those basically are bribes), and I'm very sorry it makes you think that you can just walk over regular people like me.

Dear Clark County Council Members and Clark County Planning Department:

We submit this letter to you as you prepare to create and approve a new ordinance on the subject of short-term vacation rentals in unincorporated Clark County.

We, the Nevada Vacation Rental Professionals (NVRP) association, offer our overall support for an STR ordinance for Clark County. We offer our sincere appreciation for your efforts to create **reasonable** regulations within the complex parameters of AB 363. However, we are concerned about the ordinance application process and several mandates within the draft ordinance. As written, it will negatively affect our members. We ask for the draft ordinance to be revised and offer some suggestions.

The NVRP was formed in October 2018 during the Vacation Rental Management Association's (VRMA) International Conference, which was held in Las Vegas. The NVRP is an official affiliate of the VRMA, the leader in professional development and education for vacation rental managers since 1985. The VRMA will hold another International Conference in Las Vegas in October 2022.

The VRMA has authorized the NVRP to voice concern about some of the components in the Counties draft ordinance. The VRMA was involved in our advocacy efforts during the 2021 Nevada Legislative Session and expressed concern over AB 363 mandates.

Our goal is to help professionalize the STR industry in the entire state of Nevada, which, as it has grown, has provided complex challenges for communities. Our board consists of licensed Nevada real estate agents and permitted property managers, as well as owners of vacation rentals with 5 to 30 years of experience. We support code compliance.

In developing our organization, we created our own "Good Neighbor" program, which we require all members to abide by, as well as the professional standards we expect our members to uphold. We seek to give back to communities in all of the municipalities of Clark County and prove our commitment to respect and improve our neighborhoods and immediately address neighbor and owner concerns.

We adamantly support reasonable regulations, fees, and licensing of our industry in the state of Nevada. Our organization is here to assist and aid in eliminating the so-called "bad operators" by providing education and tools to create more licensed "professional operators." We aid our members with monthly gatherings, including educational segments, and help all members remain current on regulations and industry trends.

Most importantly, we believe the best vacation rentals are invisible or viewed as positive small businesses by our neighbors. Our STR businesses should be run as well-maintained residential units in our neighborhoods. This is a realistic goal if basic rules are in place and are respected by owners and managers.

The NVRP is here to help and educate.

Many of our members have been operating under the City of Henderson's ordinance since it was enacted and have found it the most promising and reasonable STR governance in all of Clark County so far. Statistics support this conclusion, as does the seasoned experience of code-compliant hosts and managers.

Concerning the proposed ordinance for unincorporated Clark County, we see concerns that need to be amended to better help with the regulation of the short-term vacation rental industry in Clark County:

- The Lottery System for STR License Applicants - The lottery system is not conducive to a fair and equal opportunity to obtain an STR permit. Henderson did a great job setting up the parameters for STR permit/registration applicants. During the first year of their ordinance, they allowed anyone to apply for a permit. We did see a saturation of STR permits in neighborhoods of the most desirable locations. In the second year, they set parameters of the distance separation that allowed for a more reasonable amount of properties per geographical area, which was helpful in dispersing the STR growth. Due to the pandemic challenges, the City had more disruption than it would have typically experienced, so it enacted a greater distance separation than they stated as optimal. Some officials and staff spoke of reducing it to the AB 363 distance separation mandate. If possible, the County should allow for a period when STR applicants can come forward without the lottery and the extreme distance separation requirement. The City of North Las Vegas offered a sixty-day window for this. The City of Las Vegas had an ordinance for years before adding the distance separation overlay. A phased roll-out would allow this. Then, the distance separation map could be applied as an overlay to perhaps slow STR growth. Even if the distance separation requirement must be applied to all new STR license applicants during the initial roll-out, the County should allow applicants to apply on a first-come, first-served basis to obtain the STR permit. The distance separation will then help ensure that the permitted properties will be situated throughout the County on a balanced level. There is no need for a lottery system within the STR license application process.
- A maximum number of properties allowed per person/entity - Limiting a person's financial interest to having one (1) vacation rental property is unreasonable. The County should align with AB 363's bill, which allows up to five (5) STR properties per state business license. Even three (3) properties are better than one. Allowing each owner to have more than one (1) rental property will promote professionalism. It will support local small business owners, including property managers.
- Limiting the amount of permitted STRs to only 1% of total properties/household units - This number of STRs in Clark County is far less than how many illegal

STR properties are now operating. This severe limitation may be considered a continuation of the County's STR ban, which is prohibited in AB 363. Given this tiny amount of properties that will be able to legally operate under a 1% limit, many current STR hosts will be hesitant to apply for an STR permit given their low percentage chance of even being able to get awarded a permit to operate. Therefore, this portion of the ordinance will not help regulate the STRs currently operating in the valley. It will essentially keep it at the status quo, which is not the intention of the ordinance or AB 363. It will hurt code-compliant professional hosts and managers who will need to compete against thousands of illegally operating STRs or the random hosts who will pick up reservations if the County can shut down illegal operators.

- NRS 116 is existing law regarding Common-Interest Communities (HOAs). AB 363's requirement for governing documents to expressly state that STR is allowed conflicts with current law. It is unfair for realtors, property managers, and homeowners in Clark County to have their rights reduced by a sentence in AB 363 when the rest of Nevada homeowners will still be allowed to work within NRS 116 protections. The County should remove the AB 363 mandate from the County ordinance until there is a legal decision from the State on this matter.

We have more suggestions about the other parts of the ordinance. However, we feel these are the most critical areas to amend so that this ordinance can set the framework for responsible short-term rental hosting in the valley.

Creating an ordinance that serves everyone is a mighty task. It is vital to create an ordinance that engages responsible property owners/managers by showing them a clear roadmap to legalizing short-term rentals. The County should allow for sufficient STR licenses to fill current consumer demand for vacation home/short-term rental stays. It will be most successful for everyone involved, from the STR hosts to the neighboring homeowners and even the casino resorts. We urge you to revise this draft.

With many thanks from all of us, we look forward to working together with Clark County. Please let us know how we can help.

Sincerely,

The Nevada Vacation Rental Professionals Board & Members

NVRP Contacts:

President, Stephanie (702) 743-5862 or Director, Julie Davies (702) 755-6881

info@nevadavrp.com

<https://www.nevadavrp.com/>

<https://www.vrma.org/>

Honorable Clark County Commissioners and Staff,

I'm responding to your request for input regarding the County's draft Short-Term Rental (STR) Ordinance.

The draft ordinance, as written, will harm or cause loss to residents, small business owners, and County staff. It will not benefit resorts (and I speak as someone considered an expert in STR and resort management). It will not help people needing affordable housing. It will not help neighborhoods with disruptive operators (or the new neighborhoods that will be disrupted). It will not help those few hosts who will be granted an STR license.

As written, the County's STR ordinance will only benefit illegal operators and conglomerate property management companies (and some shifty reservation sources). The County (and our neighborhoods) will experience more chaos and disruption than we currently have within the STR ban. And County staff will be burdened with more workload than is necessary.

However, if the draft ordinance is significantly revised, it can help stabilize the situation here. If enough STR licenses are issued to accommodate the current consumer demand for STR, there will be greater funding and more effective means to enact more effective code enforcement efforts. And it will be less profitable for bad operators, so they will be less likely to try to run illegal or "arbitrage-style" businesses here.

As an expert in STR and lodging and as a Clark County resident and Nevada small business owner, my BIS statement will not be short. This is a pressing issue, and the process for lifting the STR ban (as mandated by AB 363) is at a critical juncture. The situation can get much better through revision of the ordinance---or it can get worse than we can imagine. The STR ordinance should not be enacted as written.

First, I'll introduce myself since I'll relate a personal case study that illustrates the harm of overly-restrictive STR governance. My family and I have been Clark County residents since 2007. Before then, I served as an adjunct professor at several Nevada universities and consulted for Las Vegas resorts over the years. And I'm a descendant of an original settler of the Las Vegas Valley who helped build the oldest man-made structures in Nevada (that included guest quarters. Lodging management must be in my blood).

My family has invested in short-term rental properties in several states for more than thirty-five years while I managed hotels and long-term care facilities. In 2016, I was asked by the City of Las Vegas officials to write a course about short-term rental laws and best practices. I agreed to write and teach the class, thinking it would be an excellent way to provide community service that would help our community and an industry I enjoy (that's the reason for the low tuition fee within academic settings rather than the course being a profit-making business venture). I had hoped it would help stabilize the situation here as cities and the County enacted more reasonable STR regulations. From the excellent academic, real estate, and student reviews and the high praise from officials benefiting from the course, it's appropriate to report that the

course is helping. But we have a long way to go before stabilizing the situation here. Quality education alone can't get it done. And even responsible hosting by the few licensed STR hosts and property managers can't accomplish it. We need wise governance to support quality STR hosting. Anyone who has taken the STR Certification class understands that I advocate for the code-compliant and community-friendly small business owner. (That is how I manage my successful businesses).

Other cities and universities learned about the acclaimed Vacation Home/Short-Term Rental course and textbook, so the class is now offered in over twenty colleges and universities across the nation in the professional course version (2-day live or online equivalent), a four-hour real estate CE and governance course in several states, and a for-credit semester course within Hospitality Management or Business Management degree programs. I've also taught more than thirty topics within Hospitality and Restaurant Management for the American Hotel & Lodging Educational Institute (I'm one of few with the Permanent Faculty designation, having taught their courses since 1986). And I've written long-term care courses for CE and within university programs. I'm considered an expert in lodging management, including vacation home/short-term rental management. I lecture internationally on the subject, and I'm working with a team of industry experts and educators on an academic study on STR Governance Best Practices.

Many people have suggested that the STR Certification Course be mandated within the County ordinance, which is an appreciated compliment. However, I understand that the County has a plan for internal education for license applicants, which I support. There has been misinformation about the class and me, so I'll clarify my role and commitment. Officials have asked if the course can be an approved educational resource within their regulations, or they mandate or highly recommend the STR course on a case-by-case basis. I have agreed to make the course available for several cities to use for their applicants, so I will continue to do so. We had thousands of students complete the course before it was mandated and approved for real estate CE. It's quality education offered within accredited settings. It's a trusted resource. We (my co-author and I) have plenty of students attend the course because they want to be there. (And since the professional course [2-day or online equivalent] isn't a profit-making venture, we're not concerned about not having students mandated to attend the class who don't know enough to know they need education and then cause havoc in a mandated class until they perhaps realize they need it. Since it's community service, I'd rather not deal with those operators. I can and do, but it isn't why I teach). For me, it's community service.

The STR Certification Course is an available and valuable tool that has proven to help with code compliance and enforcement efforts, but that isn't why I mention the class. It is a foundation element of my unique expertise and why I understand what is happening in the Las Vegas Valley regarding STR and lodging trends (opportunities and threats). Some of the worst operators have recently entered the class to try to gain the certificate (perhaps in case it's needed---not all have passed the course, though). They have shared some of their schemes (which make me very concerned. Because professors must work within FERPA, I can't disclose any information about students, but what they reveal gives me an exceptional understanding of their plans). So, when I say that the situation will dramatically worsen if the draft ordinance is

enacted as written, it's because I've studied this issue, I know what bad operators will do, I know what good hosts will do, and I've heard the despair and loss of hope from Clark County STR small business owners. I understand the predictable outcomes well.

My expertise developed over time through experience and research---and listening to students, managers, other industry experts, officials from many cities, and guests. Owning short-term rental homes and bed & breakfast inns has provided our family with an additional income stream and diversified our investment and income portfolio. We also enjoy hosting guests and using our vacation homes for our family and extended family and friends. It's a family-owned and operated small business we enjoy. Our neighbors support our STRs because we are involved in the community and host guests through responsible, code-compliant practices.

We applied for an STR license in the City of Las Vegas in 2016 and were approved. Then the City announced that they were revising their ordinances, so we held off on opening our STR condo and didn't host guests. When the City changed its regulations to only allow for two guests per bedroom, adding the distance separation between licensed STRs, and the SUP requirement but showed that they were not likely to enforce the ordinance well, we let go of the license and sold the condo. This was a difficult decision, but one that, as wise business owners, we knew we needed to make. It cost our family losses in our investment, the furnishings and decorating costs, the sale of the property, the potential revenue from reservations we'd received for future dates, and the many hours of work we had invested in it.

Why did we let go of our coveted and hard-to-obtain STR license? As the only STR license holder in a building with over 45 unlawful listed units on Airbnb and Vrbo, I knew we would be negatively embroiled in the STR licensing controversy, perhaps for years. I knew that we would be the only licensed STR among hundreds of nearby illegal STRs in a City that hadn't done well with code enforcement in the past. We would need to charge our guests Transient Lodging Taxes, and we'd need to pay the high licensing fees and other code compliance costs. But our competitors would not have that additional 20% expense. And we would only be allowed two guests (in the sizeable, luxury one-bedroom condo) when our unlawful competitors were offering similar units to four-to-eight guests (at potentially higher rates than our two-person offering), and local hotels were offering a small room to four or more guests (at low rates since hotel rooms are often a "loss leader" here to attract guests to the major profit center--- gaming). The growing number of unlicensed STR units that would not be shut down (due to the poor governance that only allowed a fraction of the STRs to become licensed) created an unlevel playing field for legally-licensed STR owners (and for hoteliers).

The original City of Las Vegas ordinance for STR governance was acceptable and working. The problem was the lack of code enforcement and a particularly egregious party operator next door to one of the Councilwomen. Had the City shut down that party operator rather than adding new layers of unreasonable mandates to its STR ordinance, the situation would have become stabilized in the City. The City didn't and still doesn't have enough licensed STRs to fill consumer demand, so illegal hosts have plenty of work to keep them in business. (I should note that the party operator next door to the Councilwoman shut down his party house when the

City listened to STR industry experts who suggested using a nuisance ordinance that allowed officials to fine the operators and the party attendees. This ordinance was available for code or law enforcement officers to use when the two waves of unreasonable ordinance updates were enacted. The nuisance ordinance simply wasn't used until later---after the fury over the party operator had eliminated the chance for reasonable dialogue and action regarding the emerging industry. Party operators may use a hosting platform for some of their reservations, but they are not a business profiting from "short-term guest stays in a homelike residential setting." Party house revenue is from the parties, not the lodging/hosting, so they should not be considered STRs. They aren't about lodging. They are party houses.

Back to my example, my family's concerns and decisions were validated. When we decided not to host guests in the condo and relinquished our STR license, the hosting platforms simply transferred our future guest reservations to unlawful STR hosts (*consumer demand will be filled*). The unit was sold to someone who became one of the dozens of unlawful STR hosts in that building, and, to my knowledge, the unit is still, years later, being rented illegally. Code enforcement has not shut down the illegal STR units, so we would have been working at an unfair disadvantage because of poor STR governance. We would have been competing against dozens of illegal operators for years, waiting for the City to figure out how to enact reasonable regulations and effective code enforcement.

The City of Las Vegas lost a code-compliant and quality host in exchange for an unlawful operator who didn't remit taxes and didn't follow the City's ordinance mandates. **Did this poor STR governance harm my family and our business? Yes!** We will not recover the lost funds from needing to close that STR before it even opened due to the unreasonable ordinance revisions and lack of adequate code enforcement efforts. It was also a loss for Nevadans who would have benefited from the TLT funds that weren't paid by the illegal hosts who supplied the demand we would have legally filled.

However, we invested our funds from the Las Vegas condo sale in an STR in another state. That city and state benefited from our code-compliant and neighborhood-friendly hosting practices. Our local property manager, housekeepers, pool maintenance company, pest control service, and other businesses benefit from the revenue they receive from our guests and us. We remit taxes to the local authorities.

--Did the extreme ordinance components that discouraged seasoned and code-compliant STR hosts from investing in the City of Las Vegas eliminate the consumer demand for STR there? **No.** (Illegal hosts still fill STR reservations coming from many sources, not just hosting platforms. The City hasn't shown growth in licensed STRs, but there has been significant growth in illegal STRs operating in the City).

--Did it decrease the number of code-compliant STRs in the City? **Yes.** (We are not the only law-abiding hosts who chose to fund our STR units elsewhere due to the excessive STR regulations in the City).

--Did it decrease the number of STR listings available for STR consumer demand? **No.** (The City has shown a more rapid increase in STR listings and reservations than we see in areas that have enacted reasonable STR regulations).

--Did the guests who could not stay in our STR choose to stay in a local resort hotel when our STR unit closed? **No.** (STR guests are usually a different market segment who will not stay in a hotel or resort suite. Most consumers don't know if the STR is licensed or not. And if there is no STR option available, this market will usually opt for another city rather than opting for a hotel room or resort suite).

--Did the City's over-regulation of STRs reduce the amount of TLT (transient lodging taxes) remittance? **Yes.** (Legal STR hosts charge guests TLT just like hotels, and STR hosts remit taxes to the government, just like the hotels; illegal hosts don't have a tax account, and even "accommodations facilitators" can't remit taxes for an illegal STR guest stay).

---Has the whole-home rental ban in the City of Las Vegas worked? **No.** The City still has **less than 200** licensed STRs (reportedly less than fifty of them are homeshare rentals; the others are grandfathered whole-home rentals) amid **thousands** of unlawful STR listings. Illegal STRs increased at an accelerated rate in the City of Las Vegas. At the same time, the City of Henderson listings had less growth and even a decrease in STR listings (it was an actual decline when we look at the transition of listings to longer stay/31+ day reservations and study the actual reservations that support the transition) after the City enacted reasonable regulations, zoning, and code enforcement.

--Who benefited from the unreasonable ordinance revisions in the City (and County ban)? The **illegal operators**, and the reservation sources/hosting platforms/agents receiving booking fees for the reservations accepted by unlawful operators. Bad operators and reservation sources thrive in chaos.

--Did this history make the industry a better fit within the community? Were neighborhoods less disrupted? **No and no.** (We've heard from the angry neighbors who still complain of out-of-control illegal STRs in the City of Las Vegas. The STR whole home rental ban, distance separation mandate, and occupancy limits are harming the community rather than working).

--Would reasonable regulations and zoning better stabilize this industry in the community? **Yes** (studies verify this).

--Will the draft County ordinance stabilize the disruption? **No.** (As written, the ordinance will increase the disruption).

--Will it make the County attractive to hosts who would be code-compliant and neighborhood-friendly? **No!** It will make good hosts like my family invest elsewhere----but it will delight illegal operators. They thrive in chaos.

--Will the draft ordinance help local resorts or resort suite properties? **No. Illegal hosts can charge about twenty percent less** because they don't have to collect from guests and remit taxes. They don't have to pay licensing and other fees. They usually cram the units with too many guests and don't follow safety protocols (which are additional expenses for legally-run STRs and hotels). It isn't a "level playing field" to have so many illegal operators who the County won't be able to be shut down (even with the added enforcement "teeth" in AB 363 and the County ordinance---and skilled code enforcement officials. New operators will spring up to fill the STR demand. New hosts will pick up the reservations if you go through the long process of shutting illegal operators down. If the listing is shut down, another will be opened up. When

money is on the table---or within a possible reservation due to consumer demand for STR--- someone will want it). Even with the suspicious allowance for resorts to rent out some of the towers using their reservation systems or STR platforms for short-stay guests, it will not affect the whole home or homeshare STR market demand. That market is different.

--Will it make the area more attractive to illegal operators and Conglomerate Property Management/Investor groups? **Yes!** Studies show that areas with STR bans or effectual bans through poor (over-restrictive) governance show a marked increase in STR listings and reservations than areas where reasonable regulations have been enacted. (A simple look at the statistics between the Cities of Las Vegas and Henderson is quite telling).

--Will Conglomerates be more code-compliant than an STR owner host or local property manager? **No.** Studies show that owners with fewer than ten STRs and locally-owned property management companies are more code compliant than the large Conglomerate property management companies and outside investor groups.

--Can this concern be improved if the County rolls back the extreme components and limits within the draft ordinance? **Yes!** (Please revise the draft ordinance using our recommendations. We understand this industry and the trends).

STR consumer demand will be filled. The County can't control consumer demand. As much as we may want to believe that the County can force the hosting platforms to only list licensed STRs, it will not happen (and there are hundreds of other reservation sources). Consumer demand and the desire for profits will find a way around the prohibition/overly restrictive mandates (and a particular platform has already invented a few ways of doing so). STR consumer demand is based on a societal change in the way many people want to travel and book travel. An effectual ban through poor governance will not change consumer demand. It won't make consumers want to choose to stay in a hotel or resort suite over an STR. The three lodging segments are very different from each other. Unreasonable regulations will benefit unlawful operators and harm code-compliant Nevada small business owners (STR owners and local property managers).

My family has never owned or managed an illegal STR. We take great pains, and sometimes losses, to be absolutely code compliant. We choose to close a business rather than run it unlawfully, even when governance is changed unfairly and negatively for our business. Because of our diverse portfolio and conservative management practices, we have been able to do so.

However, many other families don't have that security, commitment, or the luxury to be able to make that sacrifice, especially post-pandemic. Please don't harm local families by enacting unreasonable regulations that will hurt local small businesses the most.

The County's proposed ordinance draft is worse than the problematic ordinance passed in the City of Las Vegas that prompted us to close our STR business here.

I understand that AB 363 and the longstanding STR ban have created a situation where it's difficult to govern this situation well. And this emerging industry is much more complicated and

misunderstood than most people realize. The STR ordinance doesn't need to be this restrictive and impossible.

My family had hoped to invest in an STR near our home in Clark County. When we planned to open an STR here, our goals were to diversify our investments/income further, employ our adopted children to help maintain the STR (allowing us to help them), use the home to host friends and family members who want to stay with us when they visit Las Vegas (a "spare bedroom" designed for guest stays), and offer a code-compliant and neighborhood-friendly alternate lodging option for reservation guests. Having an STR near our home would allow us to personally manage more of the hosting functions (whereas our remotely-owned STRs require staff for many of the functions we could handle here). We know how to host responsibly, and our neighbors love our STRs because we are good neighbors and hosts. It can be done.

However, we wouldn't consider hosting an STR here within the current governance situation. I'm sad about this, and we consider it another loss. The County's draft ordinance includes numerous unreasonable and overly-restrictive ordinance components, a lengthy, ambiguous, and potentially subjective licensing process, and the expressed hostility toward local small business owners. But more so, we would not put ourselves in the position of having to charge twenty percent more than the thousands of illegal competitors supported by this ordinance. It will undoubtedly create more chaos in neighborhoods than the current STR ban. New illegal STRs will spring up in areas faster than code enforcement officials will be able to shut some of them down. My family will not be put in a position where we will have to compete against thousands of illegal operators. It's bad enough to have unlawful STRs in our neighborhood continuing to cause disruption because they spend their energy evading code enforcement rather than concentrating on quality hosting practices. But it can get worse.

At a recent Town Hall Meeting, Commissioner Naft spoke about a "fine line" or "balance" that officials were trying to achieve through STR regulation. The County's draft ordinance is so far from straddling that fine line or creating a balance that it will take considerable revision for it to become balanced and effective. It's highly unreasonable as written. It will produce adverse outcomes that future revisions won't be able to correct. The situation and fury will be far worse than it is now. Justifiably.

The County needs to:

- pull ordinance components back to a more reasonable line (at least matching the already excessive AB 363 mandates),
- stop considering the lottery (or randomized number) system for processing STR applications,
- create a first-come license application system that will provide an answer to applicants within hours rather than months (an online system could do so with minimal work for staff),
- significantly increase the number of STR licenses allowed to be granted within Unincorporated Clark County,

- plan to use the increased funds from more licensed STRs (and the decreased challenges of having thousands of unlicensed STRs to try to nail down) to concentrate on shutting down horrendous operators,
- streamline the process (for applicants, but more importantly, for staff. This ordinance draft will create unnecessary work—and cost--- for County staff. There are much more efficient and effective ways of handling this process),
- reduce the distance separations to the AB 363 limits,
- increase the occupancy limits (per bedroom and per unit),
- increase the number of licenses permitted per applicant,
- apply existing law in NRS 116.340 (and 116.335) provisions for HOA/Common Interest Communities (not the sentence in AB 363 that conflicts with existing law);
- set a limit on the number of units for which a person can be listed as the local contact or manager (this is more important than most people realize),
- stop vilifying all STR owners and managers (give small business owners a chance to prove themselves. Reward good hosts. Fine and shut down code violators. People tend to behave better when treated with respect. Only a tiny percentage of STR hosts are causing problems, and even less will cause problems when STR licensed).
- Eliminate other unreasonable barriers that will only frustrate and discourage good hosts but will be worked around or abused by bad operators.

I sent a long list of recommendations that came from a group of experts and educators who considered the unique needs of Clark County (involving the AB 363 mandates and the trends we see). Unfortunately, the key elements were not applied to the County's draft ordinance. Perhaps you can revisit the document and see if other details will answer the needs of those who have responded to this request for input.

I will list some of the components again below as I go through critical concerns in the current draft ordinance. We are experts in Vacation Home/Short-Term Rental management and governance. I hope officials will listen to our advice. We have nothing to gain or lose by offering it. We know what will happen if this spirals out of control (which it will if the current draft is enacted). Prevention is better than mitigation.

I'm not particularly eager to point this out. However, experts have stated that some of the County's draft ordinance components (and some mandates in AB 363, if applied to the County ordinance) will undoubtedly result in lawsuits (perhaps from large outside firms that have won such battles in other states). I feel that when a matter enters litigation, no one wins. Now is the time to prevent challenges. Why give people the opportunity to sue the County? Wouldn't County resources be better spent on other issues?

There is still time to turn this negative situation around. But the draft ordinance needs to be pulled back to achieve more effective and appropriate governance.

As I'm sure you can tell, I'm highly concerned.

The pandemic and economic downturn have already accelerated emotions and personal hardship for many people here. Local small businesses need the County's support. And the resorts need support, too. The ordinance will not benefit the resorts (not even with all of the preferences shown to resort-managed units and "vacation homes." The draft ordinance will cause harm to resort properties and our overall tourism promotion efforts). The "playing field" for hotels and legal STRs will be more uneven due to the thousands of illegal properties that will fill consumer demand through creative means.

It will cause further disruption of neighborhoods (and infuriate constituents when the chaos and mayhem continue to worsen for them). Code enforcement officials will continue to play a game of whack-a-mole with migrating STR hosts. It will not bring in funds, but it will require wasted funding to try to manage this issue.

Local realtors will be harmed. Local property managers will be harmed. (I can explain what has happened in other areas that tried to enact overly-restrictive STR ordinances).

Who will benefit from this course of action? A few out-of-state technology/reservation companies, out-of-state investor groups balancing their portfolios without regard for what it does to a home or community, and conglomerate property management companies who think they're too big to worry about fines or compliance issues. They will easily find loopholes to manipulate licensing mandates for the properties they can get licensed. The majority, though, will be operated illegally.

Suppose the County were to write on a piece of paper the number of bad operators they can't currently shut down. Now put a zero behind it. And another. That may more accurately indicate how many new uncontrollable party operators you will be dealing with if the STR ordinance is passed as written. They will be worse than the current party operators pretending to be STR hosts. And they will have teams of expensive attorneys.

Having written bills and ordinances, I consider the work behind them (and after they are enacted) like an iceberg. There are many effective ways of streamlining the process to cause less confusion and eliminate needless work (not to mention costs). I wonder why the County is creating so much work at the top of the governance iceberg that will increase the mass of work beneath the surface that most constituents don't see, but that can be costly and cumbersome.

I've made numerous notations in the margins of the ordinance draft and can share them with you if you like (similar to the notes I made on the City of Henderson revised ordinance). **But here are a few of the ordinance components that should be better defined or revised:**

---6.12.982 Vacation Homes: This is a faulty definition and will cause concerns (and perhaps litigation). It shows a misunderstanding of this industry or other concerns. I realize that there are existing license holders and that the resorts are involved in many of them. But they are not

vacation homes. And they appeal to a different market segment than actual vacation home/STR guests.

---7.100.010. Findings: There are gross inaccuracies in these statements. Is the County prepared to prove the statements to be accurate and unbiased? Are these statements necessary within this draft ordinance?

---7.100.020. Definitions:

(a). the definition of “accommodations facilitator” is challenging, especially with the ambiguities and contradictions in AB 363. The County can and should more accurately define this term. It currently allows for abuse. (This industry and the technology companies that serve the STR industry as online travel companies can be confusing. The chaos benefits bad operators. More accurate definitions may prevent future challenges and troublesome snares from AB 363 contradictions and ambiguities).

(c). Advertisement may be defined as intended here, but it may be unreasonable and unenforceable when applied to the ordinance.

(f). Common-interest community. This is another challenge created by AB 363 (see more details below).

(k). Local Representative. This should be more clearly defined. What do you mean by local? How local do they need to be? A Nevadan, a Clark County resident, living or working within 20 miles of the STR? (There are industry-related reasons for this concern).

7.100.050. Limitation on the number of Short-Term Rental Licenses: One percent of households is too low. The estimate of the one percent is reportedly 2,800 licenses within Unincorporated areas allowed for STR when there are an estimated 12,000+ active STR listings at present. It’s unreasonable to think that 2,800 licensed hosts can fill STR consumer demand. And it’s even more outrageous to expect code enforcement officials to try to shut down the remaining thousands of illegal STRs. When nearly five percent of households accurately mirror the current STR demand (and listings/reservation sources), this percentage should be increased to at least three percent.

AB 363 states that STR operators are not to be punished, and the industry is not to be banned. The severe limit is an effectual STR ban. Furthermore, many of the current STRs have calendared reservations (like it or not). Who will fill the reservations? Like my STR calendar of future reservations from the STR license I chose not to use, the STR guests will be accommodated by illegal operators if there are not enough legal hosts to fill the reservations. *Consumer demand will be filled.* And STR reservation guests cannot be herded to resort properties. Studies show that the STR guests/market is different from hotel and resort suites markets. There are reasons why STR guests choose houses.

Legally licensed STRs are more easily shut down if the hosts do not comply with the County laws. The license gives the business and the reservation calendar roots. Illegal operators can simply move their calendars to a new location (disrupting another neighborhood and evading code enforcement efforts).

Again, if you want to slow the process due to legitimate concerns, you may use the phased roll-out system for processing STR license applications. While it may be too late to realize the benefits of the first phase roll-out we discussed within the suggestions offered by industry experts. However, the County can allow for certain circumstances, businesses, zones, or a reasonably and temporarily limited number of licenses for phases of ordinance roll-out. One percent in the first short phase (very short), another one percent in the second phase, and another in the next phase would be much more reasonable, fair, and manageable than the lottery system and one percent cap.

Again, by allowing for too few licenses, the County will benefit illegal operators while harming the licensed STRs and resorts. This will become prime real estate for the Conglomerate investment/property management groups and “arbitragers.” There will be less revenue for the County to work with but higher costs for ineffective code enforcement efforts.

License enough STRs to meet consumer demand. Demand will be filled by legally-operating STR hosts who will be anxious to hold onto their coveted licenses. And if they are not code-compliant, it will be easier and more cost-effective to shut the bad businesses down. It will be more profitable for the platforms to send reservations to the legally-licensed STR listings when there are enough to fill consumer demand (and allow the platforms to earn their booking fees legitimately). Then there will be less opportunity for illegal operators to make a profit in the County.

---7.100.070. Ineligible Property Owners:

(a)&(b). To allow only one license per property owner is unreasonable and can be worked around (especially by the Conglomerate investor/PM groups). The quality of the STR management matters rather than the number of units per owner. AB 363 already set a limit attached to state licenses. The County should allow for at least three to five STR licenses per property owner. (Limiting the number of properties managed or monitored by a local representative would be much more important and effective than trying to limit the number of licenses per owner).

Does this include Vacation Home Licenses? There will be potential problems if STR licenses are treated differently from Vacation Home licenses (again, the definition is troublesome. I know that there are existing Vacation Home licenses in the County and perhaps unreasonable pressure from resorts regarding this issue. However, the definitions and differences will reportedly create legal issues for the County).

---7.100.080. Ineligible Residential Units: There are a few problems in this section. The most damaging concern is in (e). AB 363 and the County draft mandate conflict with Nevada laws in NRS 116 regarding Common-interest communities/HOAs. The other problem that experts have identified is that AB 363 only applies to areas in Clark County. NRS 116 applies to the entire state---and this existing law wasn’t changed before AB 363 added the sentence about HOAs that conflicts with this code. It is unfair for property rights within such communities to be unfairly changed/limited for Clark County property owners.

And (f). While AB 363 set two ridiculous distance separation mandates, it is unacceptable for the County to add another football field length to the excessive distance separation of 660 feet from any licensed STR. This should be pulled back to 660 feet from the proposed 100 feet.

The stacked limitations and challenges within 7.100.070. and 7.100.080 will severely limit the number of units that qualify for STR licensure. This will create an unfair situation for those who are licensed (and for hotels) because there will be thousands of illegal STRs. And it may be considered an effectual STR ban. It will also benefit the Conglomerates and illegal operators.

Would you rather grant a business license to a local small business owner (either the property owner host or a local property manager), or would you prefer to grant a license to an out-of-state conglomerate property management company's investor who doesn't care about the condition of the property or the home since the STR is just part of their portfolio strategy? They reportedly use STRs to write off expenses from other investments. They obtain low downpayment loans and pull funds out of the home in case of fines (and other schemes).

The small business owner will be less likely to take on the layers of risks and financial loss due to the lengthy licensing process than the out-of-state investors. And the small business owner will be more likely to work hard to hold onto their coveted STR license for the long run. And they will use their legal teams rather than try to work within the regulations. It's just a short-term investment for the Conglomerate Investors. We've seen this happen in other areas.

Why not give local property owners and property managers representing owners a chance to prove that they can run code-compliant small businesses? If the businesses are not code-compliant, the County can revoke the STR license. Why not collect the funds and tax revenue (and spend less on code enforcement efforts for thousands of illegal STRs?

---7.100.090. Short-Term Rental License Application Requirements:

(a). Applications in writing? Why not use an online application process? Automation can save much time and cost, and it will appear to be less subjective.

And is the application referring to a unit or a parcel?

Will multiple applications be allowed when more than one residential unit is on a parcel?

(b). There have been questions about the definition of a natural person (this might need to be added to the definitions section). When we asked, we received two different answers. One official stated that natural referred to a human rather than a corporate entity (which is understandable). Another staff member said it would disallow property owned by "foreigners who were not natural citizens." This needs to be clarified.

Also, the local representative should be better defined. We highly recommend that the local representative be limited in the number of units they can represent. This is much more important than the number of units owned by one license applicant. As written, a local representative can be in charge of dozens of STRs. How will this person be able to respond to emergencies? Will Conglomerate property management companies be able to have one

representative for hundreds of units owned by different investors? Will a company pretend to be monitoring many properties but be found only to have one computer and a cell phone used during business hours? (This is happening). Will the local representative have to be a “natural person” (with a name and ID) rather than a business entity?

(c). Again, NRS 116, existing law, conflicts with (5). This needs to be addressed.

---7.100.100. Application Procedures: The stated legislative intent of AB 363 and the language within the bill don’t align with this plan.

A lottery system (“random number generator” or any other name) will not work here. The outrage and desperation expressed by STR hosts and managers after this announcement should have let County officials know that this would not work. It should have been taken off the table months ago. After so many years of waiting for the County to lift the STR ban, STR hosts and managers should not be expected to wait for more months after submitting an application. And the misbehavior of other cities regarding STR licensure or the use of lotteries for other industries has eroded any trust in such a system. The ordinance and the licensing process will seem rigged no matter how well it’s implemented.

And the timeframe is ridiculous. How could anyone be expected to run a small business under such circumstances and timeframes? This will not likely be an issue for the Conglomerate Property Management companies with their investor groups who only consider the STR property to be part of their overall portfolio. One of the benefits of conglomerate investment in STR is the losses they can write off (and potential short-term gains without regard for the condition of the property or neighborhood from guest stays). But for the small business owner STR host, this length of the application process is unreasonable.

How could this system be considered in compliance with the stated intent and the verbiage within AB 363?

If code enforcement is working effectively, there will be a turnover of licenses in some cases. And the licensing process should be ongoing. Planning may see the need or benefit of changing the zoning or distance separation in some areas for the benefit of the community.

This process would put an undue hardship on a small STR business. I certainly wouldn’t apply for an STR license under these conditions and procedures. To equip and furnish a home (that I would own or purchase) to make it ready to apply for an STR license, then have to wait for an uncertain number of months for my number to perhaps be selected, then have to wait longer to determine if it qualified within the distance separation and other conditions,... would be a ridiculous and costly risk. If my license were approved, it may be months before I could host guests because the booking calendar is handled differently from hotel reservations. The proposed licensing process would be unreasonably burdensome for STR small business owners.

A small STR business hosting guests for short stays in a residential unit is not like a liquor store or marijuana dispensary, pet shop, or hotel. It can't open up quickly or close its doors to business quickly, especially if it's run properly and responsibly. It's a small business with fixed and variable expenses (and it doesn't have the profit margins quoted in Commission meetings, even if we were reporting revenue before expenses, especially for units within the AB 363 limitations). The reservation process is different from hotel calendars, and it's highly different from long-term rental contracts and rental policies. STR booking calendars may not be filled if reservations aren't received months before the guest's stay, and there may be reservations on the books for over a year before the guest's stay.

The STR license application process should involve forms that can be filled out online. A well-designed automated system would save time for the applicants and, more importantly, for County staff. It would also be seen as less subjective. (And, there are at least two technology contractors who have stated that they can create an online application system similar to the effective one used by the City of Henderson and other cities in time for the County to roll out the ordinance by July 1st or sooner).

STR hosts and property managers have been waiting for years for the County to lift the STR ban. Then AB 363 was passed, and they thought the ban would be lifted on July 1, 2022. To wait for months after July 1, 2022, would create hardship, confusion, and contention. Trust would further erode.

And compared to an online reservation system (which can be offered on a first-come basis), what is described within this ordinance seems like a costly waste of time and a risky gamble. It is thought to be subjective (or apt to be "rigged." Public perceptions matter even if the concern may not be valid). The lottery system will also be confusing, which will cause County staff to have to deal with a deluge of questions (and repeat applications). Why would you want to cost County staff so much wasted time and work when a better system could be used? (Other procedures in this ordinance will undoubtedly waste staff and applicant time, too. There are more efficient ways of handling this for all involved).

---7.100.160. Restrictions on Rentals:

(a). Maximum Occupancy. This is unreasonable, unverifiable, and unenforceable. Severe limits incite non-compliance. A simple compromise has made hosts more compliant in other areas. It only adds two persons to the equation per unit so that it can be a well-accepted revision for both sides of the debate. We've found that simply adding two additional persons to the occupancy limit for the house (2 persons per bedroom plus an additional two persons per unit) or the equation/allowance of four persons for the first bedroom and two persons for each additional bedroom (4/2/2/2) promotes better code compliance. It's still less than is allowed in most hotel rooms (even with less square footage for most hotels versus STR), but it's more reasonable.

(d). Apartments should not be allowed for STR. This section requires better clarification. If this section isn't more clearly worded, it may open the door to those trying to justify schemes

that the County would not likely want in residential units. (AB 363 is already sprinkled with snares that might be used to argue for lessees or apartments to be permitted for STR licenses. It's best to be very clear about what is not allowed).

7.100.170. Duties:

(d). Again, the local representative should be better defined, and there should be limits on how many units they can oversee or manage.

(f). The accommodations facilitator role doesn't seem to be well defined or perhaps misunderstood. And the stated system has some loopholes that may become costly over time. Many STR hosts use more than one reservation source within a month. And some of the reservation sources only handle the inquiry, or they are a channel manager using several platforms but perhaps not handling the payment details. The owner may have direct bookings, too, that don't involve an accommodations facilitator. That's why the quarterly (or even monthly) reporting system doesn't ever work in many areas. It becomes a jumbled mess of disconnected reports that don't add up. The best way of handling this is to have the license holder (property owner or their manager) submit a detailed report each month listing their gross taxable revenue, reservation sources, and the reported revenue from each source. Any taxes not being remitted by the accommodations facilitators (such as direct bookings) would be remitted/paid by the owner (there can be several accommodations facilitator bookings and a direct booking in one month---requiring several reports and tax payments for one unit. This can create too much paperwork for all involved if it isn't addressed well). While accommodations facilitators could remit one bulk payment for the month to the County involving all units for which they handle bookings, there should be a way of separating/auditing the payments per unit. The owner report can be cross-calculated by the separate line item for each accommodations facilitator/direct booking to determine the bulk payments due from each accommodations facilitator/reservation source during the reporting period. I can explain this further or connect County staff to officials in other areas who are dealing with this challenge.

(g). "Educational" Materials: Terminology matters. A particular hosting platform has not wanted effective education about rules for hosts or quality information for guests since quality education and clear communication with guests diminishes the platform's control over the reservation. (And, too often, the hosting and guest stay then becomes controlled by the platform, which supports disruptive behavior and uncontrolled party activities), so the platform and their related vendors have pushed for the revised term "educational" for the informational pamphlets or materials a host uses to inform guests of the rules. Education or "educational" is not the proper term for this pamphlet (education is systematic instruction. A pamphlet may be informative, but it isn't education). Guests do need access to vital information. The use of a Good Neighbor or Good Guest brochure produced is an industry governance best practice. And the STR owner should have other information available for the guest about house rules, community standards, and potential consequences for guests who don't abide by rules (communication of the rules and pamphlet should be completed prior to the guest's stay and available in the unit during the guest stay).

(q). Required Placard. This is not a best practice and should not be required. It is a burglar/crime magnet in the neighborhood. It serves no useful purpose (and it conflicts with another mandate). Law enforcement officers experienced with STR have confirmed that the outdoor placard should not be required for STRs. It is harmful to the home and the neighborhood. And the placard can be an “eye sore” in the neighborhood. An STR should look like a well-maintained residential unit. What is the purpose of the placard? An STR in a residential unit shouldn’t have a business sign on it. If a neighbor is concerned about guests, are they going to walk up to the front of the house to take a screenshot of the placard? Not likely. Is there a better way of allowing neighbors and law enforcement officials to access the emergency contact information for the unit? Yes. And the County has a well-publicized complaint hotline. A good STR host will have already shared their contact information with neighbors (an STR hosting and management best practice).

(r). Noise Monitoring Devices. While I highly recommend the use of noise/decibel detection devices and agree with noise plans for STR applicants, I wonder about devices placed at the property line. This should be reviewed. We use noise detection devices and would not find them effective as required in this ordinance, especially for the concerns in the Las Vegas Valley.

(s). Advertising. While I agree with business license numbers on listings, websites, social media, and related advertising, the definition earlier in the ordinance draft doesn’t work within this industry context for several reasons. A simple revision would make it more enforceable.

And again, couldn’t the required placard be a potential advertisement? The placard on the outside of the unit should not be required.

Title 7--- Accommodations Facilitators. While the use of accommodations facilitators is required by AB 363, it’s an unnecessary and ineffective allowance/practice (meant to give more control and profitability to particular hosting platforms or reservation sources). The definitions and practices are ambiguous and conflicting in (AB 363 and in this draft ordinance) which can create situations where it can be abused or used as a loophole.

The reporting and documentation requirements need to be further defined and clarified, too. There may be better ways of holding the accommodations facilitators accountable and putting up barriers to abuse of the allowance.

7.110.010. Misconceptions are usually at the center of the STR battles. Again, this includes broad, inaccurate statements that the County would have difficulty validating or explaining (in the community, to constituents, to the media, and in legal proceedings). If you are getting pressure from the resort or culinary advocates or angry neighbor groups, perhaps we should set up a meeting with them so they can better understand how STR is different from resort management and consumer demand. I can empathize with (and am educated regarding) all of these perspectives, which can help with communication and clarification. When we offer short meetings or a free educational session to the neighbor groups, hotels, resorts, and real estate associations, the feedback after each meeting/seminar has been overwhelmingly positive. Their

comments repeatedly state that the attendees didn't understand STR before the seminar or discussion. Their misconceptions about STR (or "Airbnbs") led them to support measures that they now understand to damage their interests and industries. And I always learn from their comments in the discussions. We need to communicate better to find common ground and resolve the situation rather than regurgitating the issue every year and just adding new layers of ridiculous regulations that don't stabilize the industry and community.

30.44.010 Use Allowed in Zoning Districts. There have been many questions about allowed and prohibited zones, so this needs further clarification or revision. Incorrect interpretations of the meaning and intent could lead to many problems and challenges if this is viewed as favoring resort and timeshare use of STR in specific zones or as a way of restricting STR in reasonable zones that should allow for STR.

The above notes do not address all of the concerns within the ordinance, but I've tried to highlight the most damaging issues. If we disagree, perhaps we don't understand the ordinance components or the plan's effects in the same way. One of us may have more insight or information than the other. A discussion may be helpful.

The door is still open for this expert to help. Again, I have nothing to gain or lose from the input I share with the County. My family has already been harmed by poor STR governance, so we don't plan to host an STR here. I will not manage other properties (we're too busy for that). I speak with local hosts and managers, and many have been students in the STR Certification Course. I have heard their stories and I'm concerned about them.

Since there has been some misinformation about the STR Certification Course, I want to be clear about it, too. Officials asked me to write and teach the course. It's community service for me, so I'm not pushing for it to be mandated. It's been a cost-effective and helpful tool for cities and hosts. But it isn't a profit-making venture for me. Colleges and Universities control the low tuition rate and keep most of the tuition while I take care of much of the expense, spend my time teaching, and own the content I keep updating as the emerging industry changes (so it's not a problem or benefit for me if a city or county uses the accredited education course within their regulations ---or does something else. They just can't use the intellectual property without receiving permission from the authors and the textbook publishing company. We need to be fair to our publisher). The course is a community service that I continue to offer because I've committed to doing so for several cities and we have people who enjoy taking the course. I know it's helping hosts, realtors, managers, officials, and my community. As I told County staff, I'd be happy to assist the County in developing your educational workshop or information pamphlet, if you like. For me, it's about quality education helping to stabilize this industry and the communities affected by the societal change and consumer demand for STR.

Since I don't profit from the course and I'm not hosting or managing an STR here, I have nothing to gain or lose by offering the above feedback about your proposed ordinances. It comes from my expertise and concern for other small business owners, my neighborhood, and our

community. (My family has already suffered loss from poor STR governance here. Perhaps our example can help you better understand how this will affect other Nevada families and small businesses and our overall community if STR governance is unreasonable).

If there is anything I can do to help, please let me know. I appreciate your willingness to discuss and work on a critical issue involving the governance of this often misunderstood industry.

Wishing you the best,
Julie

Julie Davies

Author, Educator, longtime Lodging Industry Professional, and Clark County Resident

702-755-6881

scriptsandtrips@hotmail.com

From: [Melissa Cassidy](#)
To: [BL Public Comment](#)
Subject: STR proposal
Date: Wednesday, May 18, 2022 4:49:01 PM

I'm sorry to see that the county has chosed to stomp on property rights in this way. Your voters are struggling to make ends meet in a gruelling recession and I need my Airbnb income to do that. The 1000' rule is way beyond what is needed. As an owner occupied STR a 2 night minimum is ridiculous as many stay one night on their way to the national parks in adjoining states. Not being allowed to have a stereo playing on my patio while I enjoy my pool? I bet everyone voting for this has a pool with a stereo next to it! Not being allowed to have back yard lights on after 10pm when I live on the crime ridden East side of town? So now I have to be worried about intruders and not be able to light my property for my safety?! I bet everyone voting on this has back yard lights they use after 10pm! A placard on my home that announces to everyone what I am doing in the privacy of my home is not only offensive but dangerous to my safety!

I am a voter and I am watching how you handle this ordinance. I will be voting against every single person who ratifies these ridiculous rules!

Melissa

From: [Tom Davis](#)
To: [BL Public Comment](#)
Subject: STR comments.
Date: Wednesday, May 18, 2022 4:57:20 PM

Hello,

I and my wife are hosts of Short Term Rental. During pandemic I lost job and our small STR family business helped to put food on the table. I belong to Culinary Union in Las Vegas and my wife is a student. We never had a party in our home, mostly host temporary workers that come to work in Las Vegas, like contractors and traveling nurses.

We think STR should be treated like any other rental, not a business. We shouldn't be charged 13% tax.

We help local economy, schools, infrastructure.

Tom Davis and Mei Yang

From: [Kiera May Smith](#)
To: [BL Public Comment](#)
Subject: To whom this may concern
Date: Wednesday, May 18, 2022 4:57:34 PM

Hi my name is Kiera Smith and I live in district F. I am writing this email today to publicly state that you lost my vote for my commissioner Justin Jones as well as the democratic party overall. I cannot support candidates who do not support locals and instead are taking donations and rather represent their corporate donor's interests.

With this drafted and soon to be final short term rental ordinance, it seems to allow operators to host legally and apply for a permit but that is far from the truth. We know how it was designed to fail and how the city plans to taper off the total number of permits issued to hosts as the number eventually dwindles down to virtually zero after a bombardment of unnecessary and nonsensical fines will be issued to hosts due to the restrictive overreaching nature of the ordinance.

Do you really think the public does not see what you are doing? All the smear campaigns of STR operators as being nothing but party homes, when only 1% of those listings are making it a bad name for the rest of us? While the rest of us are being responsible and never received a complaint?

At the time when average people struggle to make ends meet, pay the high cost of living, pay expensive healthcare and prescriptions, send their children off to college, pay the mortgage, save for retirement, supplement their income or in some cases rely on this as the sole source of income, the last things our Democratic County Commissioners and Democratic Leadership at the State level should be doing is deprive property owners the ability to rent their properties short term and only care about the corporate profits of their corporate donors.

When my mom was laid off from her job at the MGM she took one of the spare rooms in her house to list on Airbnb and was able to supplement her lost income. She then went on to list a rental property she owned which had become vacant onto airbnb which was entirely enough to replace her lost income from her job as a blackjack dealer. She went on to host full time and continues to do so and truly enjoys doing it ever since she was laid off from 2020. She enjoys hearing and reading the reviews and comments about how much of a great time the guests had at her airbnb and their time on the Las Vegas Strip where they gambled, dined out, and purchased souvenirs. All the memos and stories we all hear about which are in the guestbook that we have for them to fill out. In the meantime, it is now 2022 and she has not received a call for her job back on the Strip. Do you think the casinos really care about her or anyone else they laid off? No. Do I think you as the commissioner care if my mom got her job back? No. She found another way to replace her income while the city did nothing for the greater good of the people during this time and now you want to make it this restrictive and next to impossible to obtain this license? This is a violation of our property rights and you will be killing our economic opportunity for prosperity of our residential property as well as the income of all the people we employ for our properties.

STR operators are victims. STR operators are being mistreated, misrepresented, demonized, and punished by their own government. All in the name of protecting corporate donors.

We can no longer stand by and watch the government exploit its citizens. We can no longer stand by and allow the government to strip away our civil liberties! It's time we hold the government accountable! Whether it's in the voting booth, or in the courtroom, the government will be held accountable.

-Kiera Smith

From: [John Wong](#)
To: [BL Public Comment](#)
Subject: Short term rental ordinance
Date: Wednesday, May 18, 2022 4:59:33 PM

Hi my name is John Wong and I live in district F. I am writing this email today to publicly state that you lost my vote for my commissioner Justin Jones as well as the democratic party overall. I cannot support candidates who do not support locals and instead are taking donations and rather represent their corporate donor's interests.

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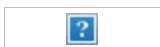
When my mom was laid off from her job at the MGM she took one of the spare rooms in her house to list on Airbnb and was able to supplement her lost income. She then went on to list a rental property she owned which had become vacant onto airbnb which was entirely enough to replace her lost income from her job as a blackjack dealer. She went on to host full time and continues to do so and truly enjoys doing it ever since she was laid off from 2020. She enjoys hearing and reading the reviews and comments about how much of a great time the guests had at her airbnb and their time on the Las Vegas Strip where they gambled, dined out, and purchased souvenirs. All the memos and stories we all hear about which are in the guestbook that we have for them to fill out. In the meantime, it is now 2022 and she has not received a call for her job back on the Strip. Do you think the casinos really care about her or anyone else they laid off? No. Do I think you as the commissioner care if my mom got her job back? No. She found another way to replace her income while the city did nothing for the greater good of the people during this time and now you want to make it this restrictive and next to impossible to obtain this license? This is a violation of our property rights and you will be killing our economic opportunity for prosperity of our residential property as well as the income of all the people we employ for our properties.

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We can no longer stand by and watch the government exploit its citizens. We can no longer

stand by and allow the government to strip away our civil liberties! It's time we hold the government accountable! Whether it's in the voting booth, or in the courtroom, the government will be held accountable.

John Wong
Investor Advisor
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From: [John Whatley](#)
To: [BL Public Comment](#)
Subject: Regarding Short Term rentals - Clark County STR ordinance statement
Date: Wednesday, May 18, 2022 4:59:37 PM

Hello,

I'm writing in opposition to your STR ordinance effectively banning all short-term rentals because of the actions of a few bad actors. 97% of hosts are good and have received no complaints.

I would like to rent out my casita/guesthouse but your proposed laws will not allow me to do so even though I live in the main house and I'm always home to regulate any issues. Your proposed ban on STRs is not fair for those who live in their houses as primary residents.

Please reconsider your ordinance and make a separate path for those that live on the property. We should not be penalized for the actions of a very small percentage (~3%) of hosts that do party houses.

There needs to be the ability to apply for a license and NOT based on a lottery. The 1000 ft distance is an effective ban. Please stay within 660 ft as the state law shows. There should be a separate license for those that live on the property.

With some complicated regulations in AB 363, please find a way to simplify them in a fair way that allows us to easily comply. As draft regulations that will impact us, please support our right to share our homes, and help all people in our community to continue to benefit from the sharing economy.

John Whatley
A resident of Las Vegas for 10 years in 89183

--

| John Whatley +1(818) 334-9298 |
| johnwhatley@gmail.com | john@johnwhatley.com |

From: [Sigrid Marmann](#)
To: [BL Public Comment](#)
Subject: Public Comments STR
Date: Wednesday, May 18, 2022 4:59:49 PM

I'm a resident of Clark County for 22 years and a legal STR host for 5 years.

Renting part of my property as a short-term rental provided me with the necessary funds to keep my property and pay my mortgage.

I'm 84 years and retired, still active in my community.

I live in the Northwest of Las Vegas. My guests select my property for 3 main reasons:

- Hiking in and around Las Vegas, Nevada, Utah, Arizona
- Visiting family and friends that live close by.
- Attending some events at the strip but spending their vacation in a quiet atmosphere away from the strip.

I'm giving back to the community by hiring local handymen for housecleaning, repairs, service pool, backyard and more. But that seems to create friction, anxiety, and frustration among the big guys on the strip as they are afraid of losing some business.

For the records, my guests are mostly families with kids, are not interested at all to spend their vacation within 4 walls, spending high priced meals in overcrowded restaurants, breezing auto smog and much more. My little property with garden and pool and BBQ offers them what they are looking for and they are coming back year after year. If you had or have a family, if wouldn't be difficult to decide where you would you prefer spent your vacation?

"Party homes" is just a tiny fraction of what the majority of short-term rentals. . But for you, it is a major cause to stress upon to make your case against us.

And Clark county commissioners want to tax our property as commercial to get more money into their pocket!????? And to please the big guys and their stock values, and deprive us from our right as private citizens?? As a matter of fact, we pay your salaries and you should serve and protect us and not trying to sneak and develop a new ordinance against our right as citizens of Clark County?

Assembly woman Rochelle Nguyen, sponsor of AB363 , has been knowingly misrepresenting facts concerning short-term rentals which borders on criminal negligence to misrepresent the facts concerning short-term rentals.

Short-term rentals aside from a couple of party houses work with absolutely no problems, the success rate is close to 99%.

KNPR Radio had a recent interview with Jacqueline Flores of GLVSTR and commissioner Tick Segerbloom.. He bluntly said that the hotel industry has to be protected. Protected by disregarding Clark county's citizen rights by siding and protecting big industry's profits and their donors?

Clark County has and still is spending millions of dollars for their multiple projects including fights against the short-term rentals, i.e. fight against their own citizens!

Guests determine where they want to spend their vacation, not the government. It behooves you to become objective evaluators of short-time rentals, we are the victims in all that. You the government neglect your duties for us citizen of Nevada, Have you not noticed yet that

there is a big wave inundating America: STR rentals! They offer people where to spend and where to pay for their vacation and decide where they want to stay.

Thank You

Sigrid Marman

8900 Silk Bonnet Curt
Las Vegas NV

From: [Sonya Haggerty](#)
To: [BL Public Comment](#)
Subject: STR
Date: Wednesday, May 18, 2022 5:08:48 PM

I believe that we need action right away to help protect the rights of STR owner. And a minimum the rules should be consistent from one city/county to another.

Sonya Haggerty
Broker-Salesperson
Rezolt Homes Elite
Sonyag619@yahoo.com
Cell:702-373-8303
Fax:702-445-0350
Sent from my iPhone

From: [The Settlement](#)
To: [BL Public Comment](#)
Subject: Fwd: Response/Comment to Clark County STR Ordinance
Date: Wednesday, May 18, 2022 5:10:51 PM
Attachments: [OrdIntro Short Term Rentals 20220427\(comments\).pdf](#)

Sent from my iPhone

Begin forwarded message:

From: The Settlement <thesettlement21@gmail.com>
Date: May 18, 2022 at 3:09:00 PM PDT
To: ccbl@clarkcountynv.gov
Cc: thesettlement21@gmail.com
Subject: Response/Comment to Clark County STR Ordinance

Good afternoon,

Thank you for drafting the revised ordinance to permit short-term rentals within Clark County residential neighborhoods. It was thorough, reasonable, and easy to understand. Attached are some of my comments, as well as the additional text below.

Improved Application Procedures for Year 1.

For the 2022 Application Year, I suggest the County assign random unique identification numbers after the first two weeks of applications, and then all applications afterwards will be in sequential order. If the County waits for six months before assigning random application orders, then the applicants may have to wait additional months before knowing the state of their STR permitting approval.

Connected to the above suggestion, it would benefit everyone if these applications could be layered on the County GIS system, for everyone to know their chances. At the moment a potential applicant would not know how many others within 1,000 feet have applied for a STR permit, where they are in line, and whether those before them are likely/unlikely to obtain a permit.

Self-Attestation rather than Inspections

For the sake of cost effectiveness and limiting liability, I suggest the County require applicants to submit an attestation rather than requiring County code enforcement officers to inspect every property. I believe that the strong majority of STR Permit applicants would do their best to pass the inspection, so requiring County staff to visit each property would not do much good. Then, any issue would still be argumentative between all the parties involved. A comprehensive self-attestation would place the burden on the permit holder, and County code enforcement would perform as usual in case of violations.

Additional Professional Permits for non-owner operated STR's.

Properties not occupied by the homeowner are truly businesses and should be required to obtain all permits to operate a business. What first comes to mind is the permit which allows cannabis use. As a resident with children, I am not in favor of a neighboring business which allows pot smoking. If that home/business went through the planning process and properly received a marijuana related permit, then I must accept it.

Other professional/business permits which come to mind include the use of pools, fire pits, zoning variances, parking etc. This higher level of permitting is required, because businesses are likely to dismiss liability to any accidents or problems, or new staff are not aware of underlying issues. Businesses have less accountability to their neighbors, so they should be held at a higher standard. Apply the same requirements as the hotels and casinos...except alcohol license. A liquor license would be impossible to enforce.

Short term rentals operated by the property owners should be excluded by this requirement for several reasons. First, there's too much variable on how often the property is rented out. Some property owners would also be present at all times, and only rent out rooms. A property owner is fully accountable to their property, and the neighborhood. If they are no longer interested in renting out their property, they will still live there, and have the same neighbors. Finally, property owners are also voters, and we want our residential community to support each other.

Fee vs Tax

There seems to be a duplication of fees within the draft ordinance. Aside from the Transient Occupancy Tax, which I support, it is unclear what the various fees pay for. Typically, a fee pays for services rendered and a permit pays for processing/review/inspection. A permit may also mean "permit to use," such as picnic shelter use permit, however I don't see how this would apply to STR. There are fees and permit amounts within the draft ordinance, which do not correlate to the work to be provided by the County.

Finally, there are taxes, and I support the TOT. I hope that the additional TOT revenues the County collects would be applied to improvements to the neighborhood communities. It's the tourists which pay for the TOT, and it should help support the areas affected/benefited by the tourism.

Thank you for your consideration.

-C

~~Strikethrough~~ material is that portion being deleted or amended

Underlined material is that portion being added

BILL NO. _____

SUMMARY – Provides for the issuance of licenses to eligible persons who rent certain residential properties for thirty (30) consecutive days or less; for the issuance of licenses to persons who, for a fee or other charge, broker, coordinate, make available or otherwise arrange for the rental of residential properties for thirty (30) consecutive days or less; and for the collection of combined transient lodging tax for the rental of certain residential properties for thirty (30) consecutive days or less.

ORDINANCE NO. _____
(of Clark County, Nevada)

AN ORDINANCE TO AMEND TITLE 4, CHAPTER 4.08 OF THE CLARK COUNTY CODE TO SUBJECT SHORT-TERM RENTALS TO THE COMBINED TRANSIENT LODGING TAX; TO AMEND TITLE 6, CHAPTER 6.12, TO EXCLUDE SHORT-TERM RENTALS FROM THE DEFINITION OF “VACATION HOMES”; TO AMEND TITLE 7 BY ADDING NEW CHAPTER 7.100 (“SHORT-TERM RENTAL UNITS”) AND A NEW CHAPTER 7.110 (“ACCOMMODATIONS FACILITATORS”) TO ESTABLISH REGULATIONS PERTAINING TO THE LICENSING AND OPERATION OF SHORT-TERM RENTAL UNITS AND ACCOMMODATION FACILITATORS, INCLUDING LICENSE ELIGIBILITY, OPERATIONAL REQUIREMENTS, FEES, PENALTIES, AND ENFORCEMENT; AND TO AMEND TITLE 30, CHAPTER 30.44 TO ALLOW LICENSED SHORT-TERM RENTAL UNITS IN RESIDENTIAL ZONING DISTRICTS; AND PROVIDING FOR OTHER MATTERS PROPERLY RELATING THERETO.

THE BOARD OF COUNTY COMMISSIONERS OF THE COUNTY OF CLARK,
STATE OF NEVADA, DOES HEREBY ORDAIN AS FOLLOWS:

SECTION ONE. Title 4, Chapter 4.08, Section 4.08.005, Subsection 4.08.005(35) of the
Clark County Code is hereby amended to read as follows:

- (35) “Transient lodging establishment” means any facility, structure, or portion of any structure which is occupied or intended or designed for occupancy by a person or persons who pay rent for dwelling, lodging, or sleeping purposes. ~~and includes any~~

(a) The term includes any:

- (i) hotel,
- (ii) resort hotel,
- (iii) motel,
- (iv) bed and breakfast,
- (v) lodging house,
- (vi) time-share project,
- (vii) vacation home,
- (viii) apartment house,
- (ix) recreational vehicle park/campground,
- (x) Short-Term Rental Unit as defined in Chapter 7.100 of this Code, or,
- (xi) other similar structure or facility, or portion thereof.

(b) The term "transient lodging establishment" does not include any: ~~of the following:~~

- (i) hospital,
- (ii) sanitarium,
- (iii) medical clinic,
- (iv) convalescent home,
- (v) nursing home,
- (vi) home for the aged people,
- (vii) foster home, or other similar facility operated for the care or treatment of individuals;

- (viii) ~~any~~ asylum,
- (ix) jail,
- (x) prison,
- (xi) orphanage, ~~or~~
- (xii) ~~other~~ facility in which individuals are detained and housed under legal restraint;
- (xiii) ~~and~~ housing owned or controlled by an educational institution and used exclusively to house students, faculty or other employees,
- (xiv) ~~and any~~ fraternity or sorority house or similar facility occupied exclusively by students and employees of such education institution, and officially recognized by it;
- (xv) ~~any~~ housing operated or used exclusively for religious, charitable or education purposes by any organization having qualifications for exemption from property taxes and under the laws of the state;
- (xvi) ~~any~~ housing owned by a governmental agency and used to house its employees or for governmental purposes;
- (xvii) ~~any~~ room within a private dwelling house or other single-family dwelling unit that is rented to a person for thirty-one consecutive days or more and ~~if~~ the permanent or principal owner also resides in and occupies the dwelling;
- (xviii) ~~any~~ unit within a time-share project occupied by an owner, or the nonpaying guests of an owner, of a time-share in a time-share project, or in the time-share plan of which the time-share project is a part, who has the right to use or occupy a unit, pursuant to: ~~(a)~~ time-share instrument; or ~~(b)~~ a time-share exchange program.

The burden of establishing that the housing or facility is not a transient lodging establishment as defined herein shall be on the owner thereof, who shall file with the director such information as the director may require to establish and maintain such status.

SECTION TWO. Title 6, Chapter 6.12, Section 6.12.982 of the Clark County Code is hereby amended to read as follows:

6.12.982 Vacation homes.

Defined as any residential dwelling in a resort condominium, as defined in Title 30 of this Code, that is utilized for transient lodging. Each vacation home shall be separately licensed and the license fee shall be three hundred dollars (\$300.00) annually. In addition to the above annual license fees, if a vacation home is rented to transient guests as that term is defined in Chapter 4.08 of this code, then taxes must also be charged according to the rates set forth in Chapters ~~4.08, 4.09 and 4.10~~ of this code. The term “vacation home” does not include a “Short-Term Rental Unit” as defined in Chapter 7.100 of the Code.

SECTION THREE. Title 7 of the Clark County Code is hereby amended to add a new chapter to read as follows:

TITLE 7 – CHAPTER 7.100 – SHORT-TERM RENTAL UNITS

7.100.010. Findings

The Clark County Board of Commissioners finds and declares that:

- (a) The primary function of residential development in Clark County is to provide permanent, affordable housing for the residents of the County. The commercial use of residential development for transient lodging is inconsistent with this purpose and constricts the availability of affordable housing.
- (b) The use of short-term rental properties to host large, disruptive parties in residential neighborhoods and for purposes other than those incidental to dwelling, lodging, and sleeping, causes harm to the quality of life for the permanent residents of Clark County and constitutes a public nuisance.
- (c) The increasing number of short-term rental units in Clark County has diverted a noticeable portion of transient lodging away from traditional transient lodging establishments and has negatively impacted the revenue derived from such rentals to local governments and other agencies and beneficiaries of transient lodging taxes.
- (d) On June 4, 2021, Assembly Bill 363 (AB 363) from the 2021 Nevada State Legislative Session was signed into law by the Governor of the State of Nevada. AB 363 requires Clark County to repeal its longstanding prohibition on the use of short-term rental

properties in residential neighborhoods and instead adopt and enforce an ordinance allowing for the rental of a residential unit or a room within a residential unit for the purposes of transient lodging.

- (e) The operation of a residential unit as a short-term rental is a commercial use which necessitates the payment of the combined transient lodging tax and which renders the short-term rental property ineligible for the primary residential tax cap permitted in NRS 361.
- (f) Pursuant to its powers to address matters of local concern; to adopt such ordinances and regulations necessary and proper to develop affordable housing; and to repair, clear, correct, rectify, safeguard or eliminate any public nuisance, the Clark County Board of Commissioners finds that it is necessary to license those persons who operate residential units for the commercial purpose of transient lodging and to impose restrictions on the operation of those businesses as is necessary to provide for the health, safety, and welfare of the public, as set forth in this Chapter.

7.100.020. Definitions

The words and terms contained in this chapter shall have the meaning ascribed in this section unless a different meaning clearly appears in the context.

- (a) “Accommodations facilitator” means a person, other than the owner, lessee or other lawful occupant of a residential unit, or a manager of a residential unit, who, for a fee or other charge, brokers, coordinates, makes available or otherwise arranges for the rental of a Short-Term Rental Unit. The term includes, without limitation, a hosting platform.
- (b) “Accommodations Facilitator License” means a license issued by the Clark County Department of Business License pursuant to Chapter 7.11 of this Code to a person who operates as an accommodations facilitator.
- (c) “Advertisement” means any form of communication, promotion, or solicitation, including but not limited to electronic media, direct mail, newspapers, magazines, flyers, handbills, television commercials, radio commercials, signage, e-mail, internet websites, text messages, verbal communications, or similar displays, intended to be used to induce, encourage or persuade the public to enter into a contract for the use of occupancy of a Short-Term Rental Unit. The term includes, without limitation, the listing of a Short-Term Rental Unit by an Accommodations Facilitator.
- (d) “Affiliate” means a person who, directly or indirectly through one or more intermediaries, controls, is controlled by or is under common control with, a specified person.

- (e) “Authorization” means a permit, license, registration or any other type of approval or authorization issued by the governing body of a political subdivision of any State, including the governing body of any county, city, or town, or the designee of such a governing body, to a person who, independently or using an accommodations facilitator, makes available for rent a Short-Term Rental Unit. The term includes a Short-Term Rental License issued by the Department of Business License of Clark County pursuant to this Chapter.
- (f) “Common-interest community” means real estate described in a declaration with respect to which a person, by virtue of the person’s ownership of a unit, is obligated to pay for a share of real estate taxes, insurance premiums, maintenance or improvement of, or services or other expenses related to, common elements, other units or other real estate described in that declaration. This term does not include a time-share project, as defined in Subsection 4.08.005(32) of this Code, or a vacation home as described in Section 6.12.982 of this Code.
- (g) “Complaint hotline” means a telephone line established by the County or the County’s designee to provide a person the ability to report violations of the provisions of this Chapter.
- (h) “County” means, unless otherwise indicated, the unincorporated areas of Clark County, Nevada.
- (i) “Department” means, unless otherwise indicated, the Department of Business License of Clark County.
- (j) “Hosting platform” means a person who, for a fee or other charge, provides on an Internet website an online platform that facilitates the rental of a residential unit or a room within a residential unit by an owner or lessee of a residential unit for the purposes of transient lodging, including, without limitation, through advertising, matchmaking or other means.
- (k) “Local representative” means the person that is responsible for responding to complaints or other issues concerning a Short-Term Rental Unit on a twenty-four (24) hour, seven (7) days a week basis.
- (l) “Nonrestricted license” shall have the same meaning as “unrestricted live game license” as defined in Section 8.04.040(B)(2) of this Code.
- (m) “Operate a Short-Term Rental Unit” means to make a residential unit or room within a residential unit available for rent for thirty (30) consecutive days or less.
- (n) “Party” means a gathering of people with that exceeds the maximum occupancy of the residential unit established by this Chapter and listed on the Short-Term Rental License.

- (o) “Property owner” or “owner” means any person who is listed as an owner of record of the unit in the records of the Clark County Assessor or, in the case of a unit that is owned by a trust or other corporate or legal entity, each trustee or principal of that trust or entity.
- (p) “Residential unit” means a single-family residence or an individual residential unit within a larger building, including, without limitation, a condominium, townhouse, duplex or other multifamily dwelling. The term does not include a timeshare or other property subject to the provisions of Chapter 119A of NRS nor a vacation home as defined in Section 6.12.982 of the code.
- (q) “Short-Term Rental License” means a license issued by the Clark County Department of Business License to an eligible property owner who, independently or using an accommodations facilitator, makes available for rent a Short-Term Rental Unit.
- (r) “Short-Term Rental Unit” means a residential unit or room within a residential unit that is made available for rent for thirty (30) consecutive days or less.
- (s) “Transient lodging” has the meaning ascribed in Section 4.08.005 of this Code.

7.100.030. Short-Term Rental License Required

No person shall engage in the business of operating a Short-Term Rental Unit without first obtaining and thereafter maintaining a valid unexpired business license pursuant to this Chapter.

7.100.040. Applicability of this Chapter

The provisions of this chapter do not apply to a residential unit located within a building that is:

- (a) Located on land not zoned exclusively for residential use;
- (b) Owned or operated by a person who holds a nonrestricted license for gaming issued pursuant to Chapter 8.04 of the Clark County Code or an affiliate of a person who holds a nonrestricted license for gaming;
- (c) A timeshare or other property subject to the provisions of chapter 119A of the Nevada Revised Statutes; and
- (d) A vacation home as defined in Section 6.12.982 of the Clark County Code.

7.100.050. Limitation on the number of Short-Term Rental Licenses

Except as otherwise provided in this Chapter, there shall be a minimum of one (1) Short-Term Rental License available for each established unincorporated area within Clark

County, Nevada. The maximum number of Short-Term Rental Licenses that may be issued in any unincorporated area shall not exceed one percent (1%) of the total number of housing units located in the unincorporated area, rounded down to the nearest whole number.

For purposes of this section, the maximum number of Short-Term Rental Licenses within each unincorporated area in the county shall be calculated by the Department on an annual basis. The Department must base its calculation upon the most recent estimate of the total number of housing units in the unincorporated area as determined by the County.

7.100.060. Short-Term Rental License to be Issued Only to Eligible Property Owner

A Short-Term Rental License shall only be issued to eligible property owners.

For purposes of this Section, an “eligible property owner” shall include only those natural persons, business entities, or personal or family trusts identified as the owner(s) of the residential unit as determined by the records of the Clark County Assessor as of the date of the application for a Short-Term Rental License, subject to the following restrictions:

- (a) Each natural person must be at least eighteen (18) years of age;
- (b) No business entity or personal or family trust may be issued a Short-Term Rental License unless:
 - (1) the shareholders, partners, members, managers, officers, principals, settlors, trustees, and beneficiaries, as applicable, are all natural persons and aged 18 years or older; and,
 - (2) the identities of all shareholders, partners, members, managers, officers, principals, settlors, trustees, and beneficiaries, as applicable, are disclosed to the Department at the time of the application.

7.100.070. Ineligible Property Owners

The Department shall not issue a Short-Term Rental License to a natural person, business entity, or personal or family trust otherwise eligible for licensure pursuant to this Chapter if:

- (a) issuance of the license will cause any property owner to obtain more than one (1) Short-Term Rental License to operate a Short-Term Rental Unit in the unincorporated areas of Clark County;
- (b) issuance of the license will cause any property owner to obtain legal or beneficial ownership of, or a financial interest in, more than one (1) Short-term Rental Unit in the unincorporated areas of Clark County;

- (c) in the seven (7) years preceding the application for a Short-Term Rental License, any natural person or shareholder, partner, member, manager, officer, principal, settlor, trustee, or beneficiary of a business entity or trust, as applicable, who owns the Short-Term Rental Unit, either individually or jointly with others:
- (1) possessed a Short-Term Rental License or other authorization which was revoked, suspended, or not renewed;
 - (2) voluntarily relinquished a Short-Term Rental License or other authorization while any proceeding to revoke, suspend, or impose conditions on the Short-Term Rental License or other authorization was pending;
 - (3) used the residential unit for the purpose of unlawfully selling, serving, storing, keeping, manufacturing, using or giving away a controlled substance, immediate precursor or controlled substance analog; or,
 - (4) regularly and continuously used the residential unit to engage in, or facilitate the commission of, criminal activity; or,
- (d) the natural person, business entity, or personal or family trust is otherwise prohibited by state or federal law or any provision of this Chapter or Code from obtaining or possessing a Short-Term Rental License.

Any Short-Term Rental License issued by the Department in contravention of the foregoing prohibitions is void and shall be revoked.

7.100.080. Ineligible Residential Units

The Department shall not issue a Short-Term Rental License permitting the operation of a residential unit as a Short-Term Rental Unit if:

- (a) the residential unit is not intended to be used for permanent lodging, including but not limited to recreational vehicles, travel trailers, tents, and motor vehicles;
- (b) the residential unit is a mobile or manufactured home;
- (c) the residential unit is located in an unincorporated area within:
 - (1) the Town of Mt. Charleston;
 - (2) Moapa Township;
 - (3) Moapa Valley Township;
 - (4) Mesquite Township; or,

- (5) Bunkerville Township.
- (d) the residential unit is not lawfully connected to a municipal wastewater system;
- (e) the residential unit is located within:
 - (1) an apartment building;
 - (2) a multifamily dwelling wherein the issuance of the Short-Term Rental License would result in more than ten percent (10%) of the residential units in the multifamily dwelling being rented for the purposes of transient lodging or which would violate a prohibition against such rentals or a stricter limitation established by the owner of the multifamily dwelling;
 - (3) a common-interest community, unless the governing documents of the community expressly authorize the rental of a residential unit for the purposes of transient lodging;
- (f) the residential unit is situated:
 - (1) within 2,500 feet of a resort hotel as defined in NRS 463.01865 or in Section 8.04.010.145 of this Code, or from a property approved for a resort hotel pursuant to a valid Special Use Permit and where construction has commenced, measured from the nearest property line of the residential unit to the nearest property line of the resort hotel; or,
 - (2) within 1,000 feet of any Short-term Rental Unit, as measured from the nearest property line of the residential unit to the nearest property line of any licensed Short-term Rental Unit, except that any residential unit located wholly within a multifamily dwelling shall not be excluded from licensure for the reason that it is located within 1,000 feet of a licensed Short-term Rental Unit;
- (g) the residential rental unit is not in a safe, habitable, and hazard-free condition, including, without limitation, any residential unit:
 - (1) which is imminently dangerous pursuant to Chapter 11.08 of this Code;
 - (2) which violates the provisions of housing or health codes concerning the health, safety, sanitation or fitness for habitation of the residential unit; or
 - (3) which was constructed, or to which any addition, alteration, or repair was made, without first obtaining any permit or other approval required by Section 22.02.165 of this Code, unless the construction, addition, alteration or repair was subsequently remediated to the satisfaction of the permitting department or authority;

- (h) a review of Clark County Code Enforcement's case management system reveals multiple substantiated violations of Clark County Code within the preceding thirty-six (36) months that were not subsequently remediated to the satisfaction of Code Enforcement;
- (i) the residential unit has been designated as below market rate or income-restricted, is subject to affordability covenants, or is otherwise subject to housing or rental assistance under local, state, or federal law; or,
- (j) operation of the residential unit as a Short-Term Rental Unit is prohibited by state or federal law or any provision of this Chapter or Code.

Any Short-Term Rental License issued by the Department in contravention of the foregoing prohibitions is void and shall be revoked.

7.100.090. Short-Term Rental License Application Requirements

- (a) All applications for a Short-Term Rental License pursuant to this Chapter shall be made in writing on forms provided by the Department. The Department shall be responsible for the administration of applications for Short-Term Rental Licenses. A separate application shall be required for each residential unit and no duplicate applications shall be permitted.
- (b) The application shall, at minimum, contain:
 - (1) the street address of the residential unit;
 - (2) the number of bedrooms within the residential unit as enumerated in the records of the County Assessor's Office;
 - (3) the name, date of birth, mailing address, telephone number and e-mail address of each owner of the residential unit, and if any owner is not a natural person, the name, date of birth, mailing address, telephone number and e-mail address of all shareholders, partners, members, managers, officers, principals, settlors, trustees, and beneficiaries, as applicable;
 - (4) the name(s) of all Accommodation Facilitators and rental sites that will be used to advertise the Short-Term Rental Unit;
 - (5) the name and contact information of the local representative;
 - (6) the name and contact information of any property manager or property management company, if used; and,
 - (7) the notarized signature of the property owner(s), as follows:

- (I) in the case of a natural person, by that natural person;
 - (II) in the case of a business entity, by the officer, director, manager, partner or other natural person having the authority to bind the business entity to a contract;
 - (III) in the case of a trust, by each of the trustees.
- (c) Each application must be accompanied by:
 - (1) a nonrefundable application fee of forty-five dollars (\$45.00);
 - (2) a declaration signed under the penalty of perjury by the property owner(s) stating that:
 - (I) the licensee shall abide by all requirements set forth in this Chapter;
 - (II) the residential unit is not precluded from licensure by operation of any provision of this Chapter;
 - (3) evidence of general liability insurance in the amount of at least \$500,000 per occurrence that indicates the property is used for transient lodging;
 - (4) a copy of the applicant's most recent bill for sewer services;
 - (5) if the Short-Term Rental Unit is in a common-interest community, evidence that the governing documents expressly authorize the rental of a residential unit or a room within residential unit for the purposes of transient lodging;
 - (6) a copy of the applicant's state business license; and,
 - (7) any other documentation or information as the director of the Department may require.

7.100.100. Application Procedures

- (a) The Department shall commence an application period for the issuance of Short-Term Rental Licenses at least one (1) time annually unless the Department determines that no licenses are available for issuance.
- (b) The application period shall remain open for not less than one (1) month but not more than three (3) months; except, however, that the application period to open in calendar year 2022 shall remain open for six (6) months.

- (c) Not less than thirty (30) days before the commencement of the application period, the Department shall publish the dates of the application period on the County website and in at least one newspaper of general circulation in Clark County.
- (d) All applications must be submitted through the Department's licensing system during the application period. The Department will not be responsible for the applicant's failure to apply in a timely manner for any reason, including technical issues.
- (e) Upon receipt of each application, the application will be assigned a unique identification number for internal tracking purposes.
- (f) After receipt, the Department may screen applications for completeness. The Department shall not be required to notify any applicant of an incomplete application.
- (g) After the application period has closed, the Department shall enter the unique identification numbers into a random number generator program that will list the timely-submitted applications in a random order to determine the order in which the applications will be considered for a Short-Term Rental License. The inclusion of an application on the list does not guarantee that an applicant will receive a Short-Term Rental License.
 - (1) The list shall thereafter be published on the County website.
 - (2) The Department shall review the applications in listed order to determine eligibility for a Short-Term Rental License until all licenses available are issued.
- (h) At the discretion of the Department, the residential unit shall be subject to inspection or code compliance review by any county agency or department.

7.100.110. Issuance or Denial of Short-Term Rental License

Upon consideration of the information provided within the submitted application, including the accompanying documents, the Department shall issue or deny the application for a Short-Term Rental License as set forth in this Section.

- (a) In addition to the conditions for denial of the application for business license set forth in Section 6.04.090 of this Code, the Department shall deny an application for a Short-Term Rental License if:
 - (1) the application is incomplete or the applicant has failed to provide all required information;
 - (2) the applicant has not paid any fee required by this Chapter;

- (3) the applicant fails or refuses to cooperate fully with any inspection authorized by this Chapter;
 - (4) the applicant has made any false, misleading, or fraudulent statement in the application or accompanying documentation;
 - (5) the applicant is ineligible for licensure pursuant to the provisions of this Chapter or pursuant to any local, state or federal law or regulation pertaining to the operation of residential units for the purpose of transient lodging; or,
 - (6) the operation of the residential unit as a Short-Term Rental Unit is prohibited by this Chapter or by any local, state or federal law or regulation pertaining to the operation of residential units for the purpose of transient lodging.
- (b) Upon denial of an application for a Short-Term Rental License, the Department shall issue a written notice of the denial of the application to the applicant which clearly sets forth the reasons for the denial. Any applicant aggrieved by the denial of an application for a Short-Term Rental License may request an administrative hearing before a hearing officer in accordance with the provisions of Section 6.04.090(j) of this Code.
- (c) Before issuance of the Short-Term Rental License, the applicant shall:
- (1) pay the annual fee required by this Chapter and a nonrefundable inspection fee of one hundred fifty dollars (\$150.00); and,
 - (2) agree to all such terms and conditions that the Department deems necessary for the health and safety of the residents of the County including, without limitation, provisions stipulating that the licensee is subject to the oversight and enforcement authority of the county, the Southern Nevada Health District, the Las Vegas Metropolitan Police Department, and the Clark County Fire Department.

7.100.120. Annual Fee.

Annual license fees shall be paid to the Department in advance. The fees shall be based upon the number of bedrooms in the Short-term Rental Unit as enumerated in the records of the County Assessor's Office:

3 or fewer bedrooms.....	\$750.00
More than 3 bedrooms.....	\$1,500.00

7.100.130. Annual Renewal of Short-Term Rental License

Each Short-Term Rental License shall be renewed annually upon:

- (a) the receipt of a renewal application on a form provided by the Department and any accompanying documentation as requested by the Department, including without limitation an updated general liability insurance certificate, property owner contact information, and local representative contact information;
- (b) payment of all fines, fees and costs stemming from violations of this Code;
- (c) inspection of the residential unit and payment of an inspection fee of one hundred fifty dollars (\$150.00), if deemed necessary by the Department; and,
- (d) timely payment of the annual fee required by this Chapter, subject to the provisions in Section 6.04.060 of the Clark County Code.

If the Department determines that a Short-Term Rental License should not be renewed, the Department shall issue a written notice to the licensee which clearly sets forth the reasons the Short-Term Rental License was not renewed.

Any licensee aggrieved by the nonrenewal of a Short-Term Rental License may request an administrative hearing before a hearing officer in accordance with the provisions of Section 6.04.090(j) of this Code.

7.100.140. Transfer of Short-Term Rental License or Change of Location Prohibited

A Short-Term Rental License is conferred only to the licensee and is not transferable for any reason to any other person.

A Short-Term Rental License may only be used to operate the Short-Term Rental Unit at the location identified in the Short-Term Rental License.

7.100.150. Change in Ownership Prohibited

- (a) Except as provided by this Section, a change in ownership of a licensed Short-term Rental Unit, including any transfer of interest in the residential unit by a natural person, shareholder, partner, principal, member, settlor, trustee, or beneficiary, is prohibited.
- (b) For purposes of this Section, a change of ownership shall not result from:
 - (1) a marriage, whereby a spouse owned a licensed Short-Term Rental Unit prior to the marriage, the residential unit was recorded as the separate property of the spouse in accordance with NRS 123.140, and the income from the residential unit is maintained as the spouse's separate property;
 - (2) the transfer of interest in the residential unit between spouses or domestic partners resulting from the disposition of property during a divorce or termination of a domestic partnership; or,

- (3) the acquisition of an interest in the residential unit by a devisee, heir, beneficiary of a personal or family trust, or beneficiary of a deed upon death, resulting from the death of the transferor, except that the Department shall revoke a Short-Term Rental License for any short-term rental residential unit if:
 - (I) the devisee, heir, or beneficiary fails to disclose the transfer of interest to the Department within sixty (60) days on a form provided by the Department; or,
 - (II) the devisee, heir, or beneficiary would be ineligible to obtain a Short-Term Rental License under this Chapter or Code and the devisee, heir, or beneficiary does not divest the interest in the Short-Term Rental Unit within two (2) years of acquisition.

7.100.160. Restrictions on Rentals

- (a) Maximum Occupancy. The maximum occupancy of the residential rental unit must be limited to the lesser of two (2) persons per bedroom or ten (10) persons per residential unit. The number of bedrooms in the Short-Term Rental Unit shall be fixed at the number of bedrooms enumerated in the records of the County Assessor's Office as of the date of application of the Short-Term Rental License.
- (b) Minimum Night Stay. The licensee must not accept bookings of fewer than two (2) nights per booking.
- (c) Multiple Bookings Prohibited.
 - (1) The Short-Term Rental Unit may only be made available to persons within the same family or group during the same booking period.
 - (2) The licensee may not accept more than one booking for the residential unit for the same booking period.
- (d) For purposes of this Section, accessory apartments, guest quarters, casitas, and temporary living quarters, as defined in Section 30.08.030 of this Code, which are appurtenant to the residential unit, shall be considered bedrooms of the residential unit.

7.100.170. Duties

Every licensee must comply with all duties, obligations, and requirements imposed by this Chapter. Such duties, obligations, and requirements include:

- (a) Duty to Update Information. Each licensee must provide the Department with any new or changed information as the Department may deem necessary within seven (7) days, including without limitation any changes to the contact information for the licensee and

local representative, and the name(s) of all Accommodation Facilitators and rental sites that will be used to advertise the Short-Term Rental Unit.

- (b) Annual Fee. Each licensee must pay to the Department the annual license fee required by this Chapter.
- (c) Insurance. Each licensee must maintain general liability insurance coverage with limits of not less than \$500,000.00 per occurrence. An excess liability policy or umbrella liability policy may be used in addition to the general liability policy to meet the minimum liability requirements. The certificate of insurance must identify that the residential unit is used for transient lodging.
- (d) Local Representative. Each licensee must designate a local representative who is responsible for the rental and available to respond to the Short-Term Rental Unit within thirty (30) minutes during all times that the property is rented or used on a transient basis. The name and contact information of the local representative shall be provided to the Department and shall be provided to any interested person upon request.
- (e) Complaint Response. The licensee shall make available to the Department a local twenty-four (24) hour phone number that provides the capability of producing a response to complaints regarding the condition, operation, or conduct of the occupants of the Short-Term Rental Unit by the licensee or local representative within thirty (30) minutes.
- (f) Required Report. Unless the following information is collected and provided to the Department by an accommodations facilitator, each licensee must submit a monthly report in the format prescribed by the Department providing the following information about the Short-term Rental Unit:
 - (1) the number of bookings, listings, and lessees for the month;
 - (2) the average number of bookings per listing;
 - (3) current year-to-date booking value;
 - (4) current year-to-date revenue collected;
 - (5) the average length of a rental;
 - (6) booking value per rental;
 - (7) actual length of stay per address per rental transaction; and,
 - (8) the names of all platforms used to list the rental unit.
- (g) Educational Materials. Each licensee shall:

- (1) furnish an educational pamphlet created by the Department to the occupant at the time of booking and upon checking into the short-term vacation rental;
 - (2) maintain a copy of the educational pamphlet within the Short-Term Rental Unit; and,
 - (3) conspicuously post a notice within the Short-Term Rental Unit that, at minimum, identifies the occupancy limitations for the residential unit, emergency telephone numbers, the twenty-four (24) hour telephone number required by this Chapter, safety information, trash requirements, parking rules and noise regulations.
- (h) Visibility of Address. The licensee must ensure that the address of the residential unit is clearly visible from the roadway and illuminated at night.
- (i) Duty to Maintain the Residential Unit in a Safe and Habitable Condition.
 - (1) Each licensee must maintain the Short-Term Rental Unit in a safe, habitable, and hazard-free condition, including, without limitation, all mechanical, electrical and plumbing systems within the residential unit.
 - (2) To ensure compliance with this code and to provide for the public peace, health, safety, order, and welfare, each licensee must permit the inspection of the residential unit by the Department, or by any department or agency required by the Department to conduct an inspection of the residential unit, with or without notice to the licensee or local representative. It shall be the duty of the licensee to provide access to and means for proper inspection of the residential unit.
- (j) Fire Safety. Each licensee must:
 - (1) provide at least one working fire extinguisher (minimum acceptable size of 2A:10B:C) on each floor of the Short-term Rental Unit, including basements and habitable attics.
 - (2) install and maintain interconnected multiple-station smoke alarms at the following locations:
 - (I) in each bedroom and room used for sleeping purposes;
 - (II) immediately outside each bedroom and room used for sleeping purposes, and,
 - (III) in each story of the residential unit, including basements and habitable attics.

- (3) install and maintain a carbon monoxide detector, or a combination smoke and carbon monoxide detector, on each floor of the Short-Term Rental Unit, including basements and habitable attics.
 - (4) post an evacuation route plan which meets Nevada Fire Marshal's regulations and standards or the provisions of the Uniform Fire Code of Clark County, whichever is most stringent, in each bedroom of the residential unit.
 - (5) ensure that all methods of egress are not constrained by obstructions including, without limitation, window security bars.
- (k) Payment of Taxes. If the licensee collects payment directly from the guest, the appropriate transient lodging tax, as determined by Section 4.08.010 of the Code, shall be remitted to the County on a monthly basis, accompanied by any documentation or reports required by the Department.
- (l) State Business License. Each licensee must maintain a business license issued by State of Nevada. Both the state business license and the Short-Term Rental License shall be prominently displayed in the short-term rental residential unit. If the state business license is suspended, revoked, non-renewed or relinquished, the Short-Term Rental License will simultaneously and automatically be suspended, revoked, non-renewed or relinquished, as applicable, and the Short-Term Rental License must immediately be returned to the Department.
- (m) Required Payments. On or before the date and time set for payment, each licensee must pay all fees required by this Chapter, all transient lodging taxes required to be paid by Section 4.08.010 of this Code, the solid waste collection charges set forth in Chapter 9.04 of this Code, and all fines, fees and costs imposed for any violation of this Chapter.
- (n) Sanitation. Each licensee must supply the Short-Term Rental Unit with solid waste containers approved or provided by the solid waste franchisee of the County, which must be sufficient to accommodate the maximum occupancy of the Short-term Rental Unit. The licensee shall be responsible for notifying guests of trash disposal procedures.
- (o) Security Camera. Each licensee must install a functional street-facing security camera capable of recording video surveillance.
 - (1) The video surveillance footage must be kept by the licensee for no less than sixty (60) days.
 - (2) Upon request of the County or any law enforcement agency, the licensee must provide a copy of the video surveillance footage within forty-eight (48) hours.

- (3) This requirement does not apply to Short-term Rental Units located within multifamily dwelling units that have common entrances to the residential units surveilled or monitored.
- (p) Record Keeping. Each licensee must maintain adequate and accurate books and records that provide a true accounting of all financial transactions for the three (3) preceding years, which must remain open to inspection by the Department during normal business hours or made available to the Department at a location within the County for the purpose of ascertaining compliance with this Code, including but not limited to the payment of licensing fees, transient lodging taxes, solid waste collection charges, and all fines, fees, or costs imposed for any violation of this Chapter.
- (q) Required Placard. Each licensee shall post a placard on the exterior of the Short-Term Rental Unit in plain view of the public. The placard must be a minimum of eight and one-half inches by eleven inches (8.5" x 11") in size and utilize lettering in a minimum legible font of seventy-two (72) point or one and one-half inches (1.5") in height.
- (1) The placard must display:
- (I) the twenty-four (24) hour complaint hotline number required by this Chapter;
 - (II) the maximum occupancy of the Short-term Rental Unit; and,
 - (III) the Short-Term Rental License number and State business license number.
- (2) On fully fenced and gated properties, the placard must be affixed to the gate and visible from the right-of-way.
- (r) Noise Monitoring Devices. Each licensee must install noise monitoring devices at each property line in both the front and rear yard of the Short-term Rental Unit, as well as in the vicinity of any outdoor pool or spa.
- (1) The noise monitoring devices must be in continuous operation while the property is rented and alert the licensee or the local representative when sustained noise levels exceed the noise standards set forth in this Chapter.
 - (2) Noise level data shall be maintained by the licensee for no less than sixty (60) days.
 - (3) Upon request of the County or any law enforcement agency, the licensee must provide the noise level data within forty-eight (48) hours.

- (4) This requirement does not apply to Short-term Rental Units located within multifamily dwelling units that have common entrances to the residential units surveilled or monitored.

(s) Advertising.

- (1) The licensee shall include the following information in any advertisement for the Short-term Rental Unit:

- (I) The Short-Term Rental License number and the State business license number.
- (II) The permitted maximum occupancy of the Short-Term Rental Unit.
- (III) The minimum number of nights that the Short-Term Rental Unit may be booked.
- (IV) An advisement that the Short-Term Rental Unit may not be used to hold a party.

- (2) The licensee shall not:

- (I) post any sign advertising the availability of the residential unit for transient lodging in or on any exterior area of the residential unit, any exterior area of any other structure on the same lot, or on the lot on which the residential unit is located;
- (II) use any advertising material that contains any assertion, representation or statement of fact which is untrue, deceptive, or misleading.

- (t) Subpoenas. Each licensee shall produce all books, papers, or documents subpoenaed within the time required by this Chapter; and,

- (u) Duty to Comply with all applicable Laws. Each licensee must comply with all provisions of this Code and state law, including state or County regulations, applicable to the residential unit and to the operation of the residential unit for the purpose of transient lodging.

7.100.180. Prohibited Conduct

- (a) No Short-Term Rental Unit may be used for any purpose other than for dwelling, lodging, or sleeping and for activities that are incidental to its use for dwelling, lodging or sleeping.
- (b) Parties, weddings, events or other gatherings which exceed the maximum occupancy of the residential unit established by this Chapter are prohibited.

- (c) The emission of noise, light, smoke, particulate matter, odors, and hazardous materials from the short-term rental residential unit which unreasonably annoys or disturbs the quiet, comfort, or repose of any persons of ordinary sensibilities, is prohibited. For purposes of this Section, the following standards apply:
 - (1) Noise Standards. The noise standards established in Title 30.68.020 of this Code shall be applied to all Short-Term Rental Units and furthermore:
 - (I) the use of any radio receiver, stereo, musical instrument, sound amplifier or similar device which produces, reproduces or amplifies sound shall be permitted only within an enclosed Short-term Rental Unit;
 - (II) during the hours of 10 P.M. to 7 A.M., the use of outdoor amenities, such as pools, spas, barbecues, and firepits, is prohibited.
 - (2) Lighting Standards. The licensee shall ensure compliance with County lighting standards established in Title 30.68.030 of this code and shall prohibit the use of all rear and side yard outdoor lighting between the hours of 10:00 PM and 7:00 AM, with the exception of motion-sensitive outdoor security lighting.
- (d) Parking. Vehicles must utilize all residential on-site parking before utilizing street parking. All vehicles shall be parked in accordance with all applicable laws and regulations.
- (e) Trash. Trash and refuse shall not be left or stored in public view, except in proper solid waste containers provided in accordance with this Chapter on the day specified for solid waste collection.

7.100.190. Complaints

- (a) Complaints regarding Short-term Rental Units shall be directed to a twenty-four (24) hour complaint hotline.
- (b) The local representative shall be available by phone twenty-four (24) hours per day, seven (7) days a week to respond to and resolve complaints made via the complaint hotline or from any other source.
- (c) Upon notification of a complaint, the local representative shall respond to the Short-Term Rental Unit within thirty (30) minutes. The local representative shall thereafter have sixty (60) minutes to resolve the problem giving rise to the complaint.
- (d) If any County employee or agent of the County must report to the Short-Term Rental Unit to assist with the resolution of the complaint, a fee of two-hundred fifty dollars (\$250.00) shall be assessed against the licensee.

- (e) The local representative shall provide a detailed report of all complaints received and their resolution or attempted resolution to the County within forty-eight (48) hours of notification of the complaint on a form approved by the Department.
- (f) Any violation of this Section shall be considered separate and independent from any violation of any other provision of this Chapter. The County may take enforcement action against a licensee for any violation of this Section separately from and in addition to any enforcement action taken to address the violation underlying the complaint, if any.

7.100.200. Powers of the County

(a) Emergency Powers.

- (1) Any department, board or agency of the County may take immediate action when necessary to address emergencies or urgent complaints regarding public peace, health, safety, order or welfare, without first notifying the licensee, local representative, or property owner, and without first issuing a written notice of violation or citation.
 - (2) Emergency Suspension or Limitation of License by the Department. In an emergency, the Department may issue a written order for immediate suspension or limitation of a Short-Term Rental License issued pursuant to this Chapter. The emergency order shall state the reason for suspension or limitation and shall afford the licensee a hearing before the hearing officer, who after a hearing, may suspend the license for specific time or until compliance with a specific requirement has been accomplished, or may condition, restrict or revoke the license.
 - (3) Emergency Suspension of License by the Sheriff. The Sheriff or the authorized designee of the Sheriff, in an emergency, for cause, or upon code violation of specific acts which endanger the public welfare; and finding that such suspension is necessary for the immediate preservation of the public peace, health, safety, morals, good order or public welfare, may suspend any Short-Term Rental License for a period not to exceed eight consecutive hours. The emergency order shall state the reason for suspension or limitation and shall afford the licensee a hearing before the hearing officer, who after a hearing, may suspend the license for specific time or until compliance with a specific requirement has been accomplished, or may condition, restrict or revoke the license.
- (b) Random Inspections. To ensure compliance with this code and to provide for the public peace, health, safety, order, and welfare, the Department shall have the power and authority to at any time require an inspection of a Short-Term Rental Unit by the

comprehensive planning department, building department, fire department, health district, department of environment and sustainability, code enforcement, and/or other local department or agency. The inspecting department or agency shall forward the results of the inspection, along with any applicable evidence supporting the inspection results, to the Department within ten (10) days after the request for inspection is received from the department.

- (c) Records and Audits of Records. For the purpose of ascertaining compliance with this Code, including but not limited to the payment of licensing fees, transient lodging taxes, solid waste collection charges, and all fines, fees, or costs imposed for any violation of this Chapter, the Department may:

- (1) demand that the licensee produce or make available all records required by this Chapter during normal business hours or at a location within the County; and,
- (2) conduct an audit of the financial statements and operations of the business.

The information received from the licensee under the provisions of this section shall be deemed confidential and available only to those county officials concerned in such matters.

- (d) Subpoena Power. Any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance may issue subpoenas for the production of documents, records or materials relevant for determining whether a residential unit or a room within such a residential unit in Clark County has been rented in violation of any law of this State or of the Clark County Code.

- (1) The subpoena may be issued only if:

- (I) There is evidence sufficient to support a reasonable belief that a residential unit or a room within such a residential unit in Clark County has been rented or is being rented in violation of any law of this State or of the Clark County Code; and,
- (II) The subpoena identifies the rental alleged to be in violation of any law of the State or of the Clark County Code, and the provision of law or code allegedly violated.

- (2) A subpoena issued pursuant to this Chapter must be mailed by regular and certified mail to the licensee or person who was required to file a monthly report regarding the rental pursuant to the Clark County Code.

- (3) Upon receipt of the subpoena, the recipient must:

- (I) provide notice of the subpoena to the user of the licensee who provided the rental identified in the subpoena within seven (7) days of the date of mailing;
 - (II) produce any subpoenaed books, papers or documents not later than twenty-one (21) days after providing the notice to the user required by this Section, unless otherwise ordered by court.
- (4) If a person to whom a subpoena has been issued pursuant to this Chapter refuses to produce any document, record or material that the subpoena requires, the District Attorney may apply to the district court for the enforcement of a subpoena in a civil action.

7.100.210. Suspension or Revocation of Short-Term Rental License

In addition to the conditions for suspension or revocation of a Short-Term Rental License set forth in Section 6.04.090 of this Code, a Short-Term Rental License may be suspended or revoked for any violation of this Chapter. The hearing process described in Section 6.04.100 of this Code shall govern any action taken by the Department to suspend or revoke any Short-Term Rental License issued pursuant to this Chapter.

7.100.220. Declaration of Nuisance

- (a) Any residential unit or room within a residential unit which is operated as a Short-Term Rental Unit without a valid unexpired Short-Term Rental License issued pursuant to this Chapter constitutes a public nuisance.
- (b) Any residential unit or room within a residential unit which is operated as a Short-Term Rental Unit and which does not comply with the provisions of this Chapter constitutes a public nuisance.

7.100.230. Enforcement Actions

- (a) It is prohibited and unlawful for any person to:
 - (1) operate a Short-Term Rental Unit without holding a valid unexpired Short-Term Rental License;
 - (2) violate any other provision of this Chapter.
- (b) Any person in violation of this Chapter shall be subject to the penalties and remedies set forth herein. The penalties and remedies shall be cumulative and may be exercised in any order or combination and at any time.

(c) Notice of Violation. Any person in violation of this Chapter may be issued a written notice of violation by any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance.

(1) The written notice shall clearly set forth the nature of the violation(s), the required action(s) to correct the violation(s), the date by which the violation(s) must be corrected, and that the failure to take corrective action in accordance with the written notice may result in the issuance of a citation and/or the suspension or revocation of the Short-Term Rental License, if applicable.

(2) A written notice of violation alleging the operation of a residential rental unit or room within a residential unit for the purpose of transient lodging without holding a valid unexpired Short-Term Rental License must be issued to the property owner.

(d) Administrative Citation. Any person in violation of this Chapter may be issued a civil administrative citation by any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance.

(1) Each administrative citation shall contain the information required by Section 1.14.020 of this Code and assess a corresponding daily fine amount for each day the violation continues as follows:

(I) where a person is alleged to be operating a residential unit or room within a residential unit for the purpose of transient lodging without possessing a valid unexpired Short-Term Rental License, a fine of not less than \$1,000 and not more than \$10,000. The amount of the fine shall be determined only after taking into account, without limitation, the severity of the violation, whether the person who committed the violation acted in good faith, and any history of previous violations of the provisions of this Chapter or any other Chapter related to transient lodging.

(II) for all other violations, a fine equivalent to the nightly rental value of the residential unit or room within the residential unit or in accordance with the following schedule, whichever is greater:

<u>For the first violation.....</u>	<u>\$500.00</u>
<u>For each subsequent violation.....</u>	<u>\$1,000.00</u>

(2) If the violation was corrected by the County or agent of the County, the citation may include any applicable fees and costs incurred by the County.

(e) For purposes of this Section:

- (1) Each violation of this Chapter shall be subject to a separate fine, and fines may be assessed cumulatively in the same citation.
 - (2) Where the person violating this Chapter is not the owner of the property that is the subject of the violation, including without limitation a local representative, property manager, tenant or subtenant, the property owner shall also be subject to receipt of an administrative citation and the remedies and penalties set forth herein.
 - (3) It is presumed that a residential unit or room within a residential unit is being operated as a Short-Term Rental Unit for each day that the residential unit or room within the residential unit is listed, advertised, brokered, or offered for the purpose of transient lodging.
- (f) Nothing in this Section shall be deemed to limit the County's right to exercise any other enforcement options and remedies authorized by law, including but not limited to:
- (1) the issuance of a misdemeanor citation to any person for any violation of the provisions of this Chapter;
 - (2) the right to suspend, revoke, or not renew a Short-Term Rental License in accordance with Chapter 6.04 of this Code;
 - (3) pursuant to Chapter 4.08 of this Code, the right to audit the financial records and collect any unpaid combined transient lodging taxes, interest, administrative fees, and penalties;
 - (4) the right to commence proceedings for the abatement of any public nuisance or chronic nuisance in accordance with applicable provisions of this Code; and,
 - (5) the authority to petition a court of competent jurisdiction for injunctive relief or any other appropriate remedy to prevent the continued unapproved or noncompliant operation of the residential unit in violation of this Chapter.

7.100.240. Initial Reviews and Administrative Hearings

Any person who contests the receipt of an administrative citation may request an initial review and/or an administrative hearing before a hearing officer in accordance with the provisions of this Section.

- (a) Initial Review. Any recipient of an administrative citation may request an initial review of the citation in accordance with Section 1.14.060 of this Code.
- (b) Administrative Hearing. A request for an administrative hearing must be made in accordance with Section 1.14.070 of this Code.

- (1) The hearing shall be conducted accordance with Section 1.14.100 of this Code.
- (2) After the hearing, the hearing officer shall issue a decision in accordance with Section 1.14.110 of this Code.
- (3) Any person aggrieved by a decision of the hearing officer may file or cause to be filed a petition for judicial review of the hearing officer's decision in the district court as provided in Section 1.14.130 of this Code.

7.100.250. Payment of Fines, Fees and Costs

All fines, fees, and costs assessed shall be subject to the provisions of Section 1.14.120 of this Code.

7.100.260. Delivery of Notices of Violation and Administrative Citations

Written notices of violation and administrative citations issued pursuant to this Chapter shall be delivered as follows:

- (a) Notices and citations issued to a licensee shall be sent to the licensee and the local representative by:
 - (1) personal service;
 - (2) first class mail and certified mail, return receipt requested, to the most recent address(es) provided to the Department, unless the licensee consents, in writing, to delivery by e-mail; or,
 - (3) posting on the property.
- (b) Notices and citations issued to a property owner shall be delivered to the property owner by:
 - (1) personal service;
 - (2) first class mail and certified mail, return receipt requested, to the property owner's address contained in the records of the Clark County Assessor; or,
 - (3) posting on the property.
- (c) Notices and citations issued to any other person shall be delivered by:
 - (1) personal service;
 - (2) first class mail and certified mail, return receipt requested, to any known address; or,

- (3) posting on the property.
- (d) Notices and citations sent in accordance with this Section shall constitute actual notice of the violations contained therein. Notice of the violation shall not be deemed insufficient due to a person's failure to maintain a current address in the records of the Department or the Clark County Assessor.
- (e) The date of delivery of the notice of violation or administrative citation shall be the date the written notice or administrative citation is personally served, mailed, posted or e-mailed, as applicable.

SECTION FOUR. Title 7 of the Clark County Code is hereby amended to add a new chapter to read as follows:

TITLE 7 – CHAPTER 7.110 – ACCOMMODATIONS FACILITATORS

7.110.010. Findings

The Clark County Board of Commissioners finds and declares that:

- (a) On June 4, 2021, Assembly Bill 363 (AB 363) from the 2021 Nevada State Legislative Session was signed into law by the Governor of the State of Nevada. AB 363 requires Clark County to repeal its longstanding prohibition on the use of short-term rental properties in residential neighborhoods and adopt and enforce an ordinance allowing for the rental of a residential unit or a room within a residential unit for the purposes of transient lodging and for the regulation of Accommodations Facilitators.
- (b) The unregulated proliferation of short-term rentals in Clark County constricts the availability of affordable housing and, to the extent that short-term rental properties are used to host large, disruptive parties and for purposes other than those incidental to dwelling, lodging, and sleeping, harms the quality of life for the residents of Clark County.
- (c) The increasing number of short-term rental units in Clark County has diverted a noticeable portion of transient lodging away from traditional transient lodging establishments and has negatively impacted the revenue derived from such rentals to local governments and other agencies and beneficiaries of transient lodging taxes.
- (d) As Accommodations Facilitators advertise most of the short-term rentals available for rent, the Clark County Board of Commissioners finds that it is necessary to license those persons who operate as Accommodations Facilitators to facilitate the collection

of transient lodging taxes from all persons licensed to operate Short-Term Rental Units in Clark County.

- (e) Additionally, pursuant to its powers to address matters of local concern; to adopt such ordinances and regulations necessary and proper to develop affordable housing; and to repair, clear, correct, rectify, safeguard or eliminate any public nuisance, the Clark County Board of Commissioners also finds that it is necessary to impose restrictions on the operation of Accommodations Facilitators as set forth in this Chapter to curtail the loss of housing units available to residents as permanent housing, to abate those short-term rentals operating as public nuisances, and to provide for the health, safety, and welfare of the public.

7.110.020. Definitions

Except as provided herein, the words and terms contained in this Chapter shall have the meaning ascribed in Section 7.100.030 of this Code, unless a different meaning clearly appears in the context.

“Deactivate” means to remove the capability of the Accommodations Facilitator to accept or facilitate the payment of consideration in exchange for the use of a short-term rental.

7.110.030. License Required

No person shall engage in the business of operating as an Accommodations Facilitator without first obtaining and thereafter maintaining a valid unexpired business license pursuant to this Chapter.

7.110.040. Application Requirements

All applications for an Accommodations Facilitator License pursuant to this Chapter shall be made in writing on forms provided by the Department. The Department shall be responsible for the administration of the applications.

Each application must be accompanied by a nonrefundable application fee of forty-five dollars (\$45.00) and any documentation or information as the Department may additionally require.

7.110.050. Issuance or Denial of License

Upon consideration of the information provided within the submitted application, including the accompanying documents, the Department shall issue or deny the application for an Accommodations Facilitator License as set forth in Section 6.04.090 of this Code.

Additionally, no license shall be issued to an applicant unless the applicant agrees to abide by the duties and requirements set forth in this Chapter.

Any applicant aggrieved by the denial of an application for a Accommodations Facilitator License may request an administrative hearing before a hearing officer in accordance with the provisions of Section 6.04.090(j) of this Code.

7.110.060. Annual Fee

Annual license fees shall be paid to the Department in advance. The fees shall be based upon the number of Short-Term Rental Units within Clark County that are listed or advertised by the licensee on a hosting platform, as follows:

<u>Not more than 100.....</u>	<u>\$1,000.00</u>
<u>101-500.....</u>	<u>\$5,000.00</u>
<u>501-1,000.....</u>	<u>\$10,000.00</u>
<u>1,001-2,500.....</u>	<u>\$25,000.00</u>
<u>2,501-5,000.....</u>	<u>\$50,000.00</u>
<u>5,001-7,000.....</u>	<u>\$70,000.00</u>
<u>More than 7,000.....</u>	<u>\$75,000.00</u>

7.110.070. Annual Renewal of License

Each Accommodations Facilitator License shall be renewed annually upon:

- (a) the receipt of a renewal application on a form provided by the Department and any accompanying documentation as requested by the Department;
- (b) payment of all fines, fees and costs stemming from violations of this Chapter; and,
- (c) timely payment of the annual fee required by this Chapter. For purposes of this section, payment of the annual fee is subject to the provisions in Section 6.04.060 of the Clark County Code.

If the Department determines that an Accommodations Facilitator License should not be renewed, the Department shall issue a written notice to the licensee which clearly sets forth the reasons the Accommodations Facilitator License was not renewed.

Any licensee aggrieved by the nonrenewal of a Accommodations Facilitator License may request an administrative hearing before a hearing officer in accordance with the provisions of Section 6.04.090(j) of this Code.

7.110.080. Duties of Licensee

All licensees shall:

- (a) before listing or advertising a Short Term Rental Unit, verify that the Short Term Rental Unit has been issued a valid unexpired Short-Term Rental License;

- (b) require that all listings and advertisements include the Short-Term Rental License number and State business license number and the maximum occupancy limitations for the residential unit;
- (c) deactivate all listings which lack a valid State or County business license number, or any listing which the Department requests the licensee remove, within forty-eight (48) hours of receipt of the request;
- (d) collect the appropriate combined transient lodging tax from the rental of any residential unit listed and remit the collected tax to the County on a monthly basis, accompanied by any documentation or reports required by the Department.
- (e) submit a report of all the licensee's listings in the County to the Department on a monthly basis and upon request of the Department, which report shall include:
 - (1) the listing number;
 - (2) the property address;
 - (3) the listing owner's name and address;
 - (4) the actual length of stay per address per rental transaction;
 - (5) the booking value per rental; and,
 - (6) any other information as the Department may deem necessary.
- (f) submit a monthly report in the format prescribed by the Department providing the following information:
 - (1) the number of bookings, listings, owners and lessees for the County;
 - (2) the average number of bookings per listing for the County;
 - (3) current year-to-date booking value for the County;
 - (4) current year-to-date revenue collected through the licensee from all rentals in the County, disaggregated by owner or lessee;
 - (5) the average length of a rental in the County; and,
 - (6) any other information as the Department may deem necessary.
- (g) produce all books, papers, or documents subpoenaed within the time required by this Chapter; and,
- (h) pay to the Department the annual license fee required by this Chapter.

7.110.090. Prohibited Conduct

No person may accept or facilitate the payment of consideration in exchange for the use or listing of a short-term rental if the residential unit or room within the residential unit has not been issued a Short-Term Rental License pursuant to Chapter 7.100 of this Code.

7.110.100. Subpoenas

- (a) Any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance may issue subpoenas for the production of documents, records or materials relevant for determining whether a residential unit in the County or a room within such a residential unit has been rented in violation of any law of this State, any provision of the Clark County Code, or any ordinance adopted by the Board of County Commissioners.
- (b) Such a subpoena may be issued only if:
 - (1) there is evidence sufficient to support a reasonable belief that a residential unit in the County or a room within such a residential unit has been rented or is being rented in violation of any law of this State, any provision of the Clark County Code, or any ordinance adopted by the Board of County Commissioners; and,
 - (2) the subpoena identifies:
 - (I) the rental alleged to be in violation of any law of this State, any provision of the Clark County Code, or any ordinance adopted by the Board of County Commissioners; and,
 - (II) the law, provision, or ordinance allegedly violated.
- (c) A subpoena issued pursuant to this Section shall be mailed by regular and certified mail to the licensee or, if applicable, to the person who was required to file a monthly report regarding the rental pursuant to this Chapter.
- (d) Upon receipt of the subpoena, the recipient must:
 - (1) provide notice of the subpoena to the user of the licensee who provided the rental identified in the subpoena within seven (7) days of the date of mailing;
 - (2) produce any subpoenaed books, papers or documents not later than twenty-one (21) days after providing the notice to the user required by this Section, unless otherwise ordered by court.
- (e) If a person to whom a subpoena has been issued pursuant to this Chapter refuses to produce any document, record or material that the subpoena requires, the District

Attorney may apply to the district court for the enforcement of a subpoena in a civil action.

7.110.110. Suspension or Revocation of Accommodations Facilitator License

In addition to the conditions for suspension or revocation of an Accommodations Facilitator License set forth in Section 6.04.090 of this Code, an Accommodations Facilitator License may be suspended or revoked for a violation of any of the provisions of this Chapter or failure to comply with any of the requirements of this Chapter. The hearing process described in Section 6.04.100 of this Code shall govern any action taken by the Department to suspend or revoke any Accommodations Facilitator License issued pursuant to this Chapter.

7.110.120. Enforcement Actions

(a) It is prohibited for any person to:

- (1) operate as an accommodations facilitator without holding a valid unexpired Accommodations Facilitator License; or,
- (2) violate any other provision of this Chapter.

Any person in violation of this Chapter shall be subject to the penalties and remedies set forth below. The penalties and remedies shall be cumulative and may be exercised in any order or combination and at any time.

(b) Notice of Violation. Any person in violation of this Chapter may be issued a written notice of violation by any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance.

The written notice shall clearly set forth the nature of the violation(s), the required action(s) to correct the violation(s), the date by which the violation(s) must be corrected, and that the failure to take corrective action in accordance with the written notice may result in the issuance of a citation and/or the suspension or revocation of the Accommodations Facilitator License, if applicable.

(c) Administrative Citation. Any person in violation of this Chapter may be issued a civil administrative citation by any person authorized to prepare, sign and serve written citations on persons accused of violating a county ordinance.

- (1) The administrative citation shall contain the information required by Section 1.14.020 of this Code and assess a corresponding daily fine amount for each day the violation continues in accordance with the following schedule:

For the first violation.....	\$500.00
For each subsequent violation.....	\$1,000.00

- (2) If the violation was corrected by the County or agent of the County, the citation may include any applicable fees and costs incurred by the County.
- (3) Each violation of this Chapter shall be subject to a separate fine, and fines may be assessed cumulatively in the same citation.
- (d) Nothing in this Section shall be deemed to limit the County's right to exercise any other enforcement options and remedies authorized by law, including but not limited to:
 - (1) the right to suspend, revoke, or not renew an Accommodations Facilitator License in accordance with Chapter 6.04 of this Code;
 - (2) the authority to petition a court of competent jurisdiction for injunctive relief or any other appropriate remedy.

7.110.130. Initial Reviews and Administrative Hearings

Any person who contests the receipt of an administrative citation may request an initial review and/or an administrative hearing before a hearing officer in accordance with the provisions of this Section.

- (a) Initial Review. Any recipient of an administrative citation may request an initial review of the citation in accordance with Section 1.14.060 of this Code.
- (b) Administrative Hearing. A request for an administrative hearing must be made in accordance with Section 1.14.070 of this Code.
 - (1) The hearing shall be conducted accordance with Section 1.14.100 of this Code.
 - (2) After the hearing, the hearing officer shall issue a decision in accordance with Section 1.14.110 of this Code.
 - (3) Any person aggrieved by a decision of the hearing officer may file or cause to be filed a petition for judicial review of the hearing officer's decision in the district court as provided in Section 1.14.130 of this Code.

7.110.140. Payment of Fines, Fees and Costs

All fines, fees, and costs assessed shall be subject to the provisions of Section 1.14.120 of this Code.

7.110.150. Delivery of Notices of Violation and Administrative Citations

Written notices of violation and administrative citations issued pursuant to this Chapter shall be delivered as follows:

(a) Notices and citations issued to a licensee shall be sent to the licensee by:

(1) personal service, or

(2) first class mail and certified mail, return receipt requested, to the most recent address(es) provided to the Department, unless the licensee consents, in writing, to delivery by e-mail.

(b) Notices and citations issued to any other person shall be delivered by:

(1) personal service; or,

(2) first class mail and certified mail, return receipt requested, to any known address.

(c) Notices and citations sent in accordance with this Section shall constitute actual notice of the violations contained therein. Notice of the violation shall not be deemed insufficient due to a person's failure to maintain a current address in the records of the Department or the Clark County Assessor.

(d) The date of delivery of the notice of violation or administrative citation shall be the date the written notice or administrative citation is personally served, mailed or e-mailed, as applicable.

SECTION FIVE. Title 30, Chapter 30.44, Section 30.44.010 of the Clark County Code is hereby amended to read as follows:

30.44.010 - Uses Allowed in Zoning Districts.

- a. The uses listed in Table 30.44-1 are subject to the development standards listed in Chapters 30.52 (Off-Site Development Requirements), 30.56 (Site Development Standards), 30.60 (Parking and Loading Regulations), 30.64 (Site Landscape and Screening Standards), and 30.68 (Site Environmental Standards) unless modified by the restrictions of any of the overlay districts in Chapter 30.48 (Zoning Overlay Districts) or by the table.
- b. The following categories of uses, conditions and exceptions are identified and listed in Table 30.44-1:

1. **Permitted Uses "P".** The use is permitted as a principal use in that zoning district.
2. **Accessory Uses "A".** The use is permitted only as an accessory use to the principal use, indicated in Table 30.44-1, within the specified district, but this does not exclude other land uses which are also considered accessory to the principal use, but not listed in Global Use Table. Within the Co-operative Management Agreement Area (See Map in Appendix G), accessory structures and uses shall be permitted on a lot deed restricted by Clark County for nonresidential uses only; where the principal use is established on the adjacent lot and both properties are under the same ownership. The Zoning Administrator shall determine when uses are accessory.
3. **Conditional Uses "C".** The use is permitted in the specified districts subject to meeting stated conditions (this may be reviewed with a building permit, business license or design review; a separate land use application is not required). If stated conditions do not apply, the use is a permitted use in that district. All conditional uses require performance measures to mitigate possible negative impacts of the use. These measures are numbered where each conditional use is listed in the Table 30.44-1.
4. **Temporary Uses "T".** Temporary uses are permitted in each zoning district subject to the performance conditions listed with an administrative temporary use (T), as provided in Table 30.16-5.
5. **Special Uses "S".** The use is permitted as a special use in the listed districts with a special use permit subject to a public hearing process per Table 30.16-4. Some special uses require performance measures to mitigate possible negative impacts of the use when each special use is listed in Table 30.44-1.
6. **Conditions related to various uses.** Most uses require performance conditions to mitigate possible negative impacts of the use. Whenever the applicant cannot or does not desire to comply with a performance condition, relief may only be sought as follows:
 - A. **Accessory Uses, Conditional uses, Temporary Uses.** A special use permit may be requested in order to waive a condition associated with these uses, unless the condition cannot be waived or varied.
 - B. **Special Uses.** A waiver of development standards may be requested in addition to the special use permit, in order to waive a condition associated with a special use, unless the condition cannot be waived or varied. Certain conditions, as listed in Table 30.44-1, may be considered to be waived during the public hearing process of the special use permit, without the separate waiver of development standards application.
7. **Prohibited Uses.**

- A. Uses not permitted are expressly prohibited; however, nothing in this Title shall be construed to prohibit constitutionally protected activities including the use of a home for noncommercial gatherings of family and friends, discussion groups, religious or political gatherings, or neighborhood meetings.
- B. If 1 of the above letters indicating the category of use is not shown in the zoning district columns in Table 30.44-1 for a corresponding use, then the use is not permitted.
- C. Transient commercial use of residential development for remuneration is prohibited in all residential zoning districts, or in any miscellaneous zoning district of this Title, except as otherwise expressly permitted [in this Title or as licensed pursuant to Chapter 7.100 of the Clark County Code](#).
 - ~~i. The provisions of this Section do not supersede private covenants, deed restrictions, declarations of restrictions and equitable servitudes which impose conditions more restrictive than those imposed by this Section, or which impose restrictions not covered or addressed by this Section.~~
 - ~~ii. The right to maintain a legal nonconforming transient commercial use of residential development for remuneration (profit) shall terminate within 3 years from August 19, 1998, after the use became legally nonconforming, subject to the following provisions:~~
 - ~~a. Such a use shall not be classified as a legal nonconforming use, and shall thereafter conform to the regulations specified in this Section, if the use is maintained, or has been maintained, in violation of, or contrary to, private covenants, deed restrictions, declarations of restrictions, equitable servitudes, or the express terms of a deed of trust, loan or other purchase agreement or security instrument applicable to the residential developed property upon which the use is maintained.~~
 - ~~b. If any such legal nonconforming use ceases for any reason for a period of 30 days or more, any subsequent use shall no longer be classified as a legal nonconforming use and shall thereafter conform to the regulations specified in this Section.~~
 - ~~c. Nonconforming uses and structures established pursuant to this Section are subject to the regulations concerning nonconforming uses and structures set forth in Chapter 30.76 (Nonconformities) of this Title for the period specified in subsection (7)(C)(ii) above.~~
- D. Storage of commercial vehicle or vehicles constitutes a commercial use of land and is prohibited in residential districts except as otherwise expressly permitted; (See Outside Storage 30-44-1) however, this provision shall not be interpreted to

prohibit the parking of a single automobile used for commercial purposes (see regulations for "Home Occupation").

- E. Storage of more than 3 recreational vehicles or travel trailers is prohibited, except as otherwise expressly permitted.
 - i. The provisions of this Section do not supersede private covenants, deed restrictions, declarations of restrictions and equitable servitudes which impose conditions more restrictive than those imposed by this Section, or which impose restrictions not covered or addressed by this Section.
 - ii. The right to maintain a legal nonconforming use of storing of more than 3 recreational vehicles or travel trailers shall terminate within 1 year from February 16, 2016, after the use became legally nonconforming, subject to the following provisions:
 - a. If any such legal nonconforming use ceases for any reason for a period of 30 days or more, any subsequent use shall no longer be classified as a legal nonconforming use and shall thereafter conform to the regulations specified in this Section.
 - b. Nonconforming uses and structures established pursuant to this Section are subject to the regulations concerning nonconforming uses and structures set forth in Chapter 30.76 (Nonconformities) of this Title for the period specified in subsection (7)(E)(ii) above.
- F. It is an unlawful prohibited use for any person owning or occupying a developed or otherwise improved parcel of land within unincorporated Clark County to fail to clear such land, within ten days after notice is given to such person by the County, of weeds, grass over 4 inches in height, or any vegetation that is overgrown, dead, dry, diseased, or noxious.

SECTION SIX. If any section of this ordinance or portion thereof is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such holding shall not invalidate the remaining parts of this ordinance.

SECTION SEVEN. All ordinances, parts of ordinances, chapters, sections, subsections, clauses, phrases or sentences contained in the Clark County Code in conflict herewith are hereby repealed.

SECTION EIGHT. This ordinance shall take effect and be in force from and after its passage and the publication thereof by title only, together with the names of the County Commissioners voting for or against its passage, in a newspaper published in and having a general circulation in Clark County, Nevada, at least once a week for a period of two (2) weeks.

PROPOSED on the ____ day of _____, 2022.

PROPOSED BY: _____

PASSED on the ____ day of _____ 2022.

AYES: _____

NAYS: _____

ABSTAINING: _____

ABSENT: _____

BOARD OF COUNTY COMMISSIONERS
CLARK COUNTY, NEVADA

By: _____
JAMES B. GIBSON, Chair

ATTEST:

LYNN GOYA, County Clerk

This ordinance shall be in force and effect from and after the _____ day of _____ 2022.



May 18, 2022

Re: Proposed Clark County Short-Term Rental Ordinance

Dear Clark County Commissioners:

As the largest short term rental association in the State, the Greater Las Vegas STR Association (GLVSTRA) speaks and advocates on behalf of the short-term rental community.

We have been meeting local and state public officials and staff, hosting platforms like Airbnb and Expedia/VRBO, the host community, local small business owners, and, most recently, neighbors in our communities to create a more inclusive and productive conversation on short-term rentals.

While the terms “short-term rental,” “short-term vacation rental,” or “vacation rental home” may be modern terms and while the practice of renting a home or space in a home to strangers or travelers may seem new to some today, the fact is that these types of homes and the practice of allowing people not related to the homeowner or travelers to rent these homes or a space in these homes has existed since the time when humans started moving from place to place and throughout history as homes evolved to the units we know today and as people travelled for work, business, or vacation.

Joseph and Mary went from home to home, looking for a space to stay. In early America, when Colonists arrived to the New World they were hosted by Native Americans in their homes or teepees. As more people arrived to settled in the New World, they too relied on using other people’s home or spaces in other people’s homes.

For centuries, since the time people began to travel whether by foot, horse, wagon, train, auto, or plane for work or pleasure, these people have always had a need for a place to stay and homeowners across the United States have always been able to welcome these travelers in their homes without issues and/or government intrusion.

Today, this practice continues and what we have seen is local and State government depriving homeowners the ability to continue to do this for the sole reason of protecting corporate profits of the hotel industry. Here in Nevada and in Clark County, our public officials at the local and state level are engaged in a war against property owners of short-term rentals in their efforts to protect the resort hotels.



Democratic Assemblywoman Rochelle Nguyen's State Bill (AB363) voted by the majority-controlled Democratic Nevada Legislature and signed into law by Governor Sisolak last year attacked Nevada homeowner's property rights and deprived many individual Nevadans and their families the ability to earn income from their property.

That Bill together with Clark County's proposed ordinance is an affront to property owner's rights, a takings under the Law, subjects property owners in Nevada to search and seizure actions by the State and Local government, and threatens property owners with excessive fines for simply renting their residential properties for less than 31 days.

Depriving Nevadans from economic opportunities from their own properties that help elevate them economically is, at the very least, class discrimination; at its worst, actions that are anti-competitive, anti-consumer, and unconstitutional.

The resort hotels should not be the only ones benefiting from our State's tourism dollars and tourists coming to Las Vegas! It's time our public officials stop protecting their corporate donors on the backs of property owners in Nevada!

Yours Truly,

Jacqueline Flores, Founder
Greater Las Vegas STR Association (GLVSTRA)



From: [H & H Capital Group LLC](#)
To: [BL Public Comment](#)
Subject: Doing STR Business
Date: Wednesday, May 18, 2022 5:23:57 PM

Hi Commissioners,

First I would like to thank you for the time & opportunities to work with you on the Short Term Rental Business. After a few meetings going over the city's strict ordinance that has passed or proposed, we/I felt being the bad guy of doing short term rental/vacation rentals business over the ordinary landlords for the long term! We don't have the FREEDOM on the options for our own property. Just too many restrictions & City went over their limitation by law & unconstitutional to our community citizens and freedom of being a property owner! Just because one bad Apple or that host/owner didn't do his/her job right, doesn't mean the entire STR is bad or will bring party guests??!! We think for our neighbors as we're in their shoes. Constantly monitor cameras with bigger groups (depending on groups) after quiet hours (10pm) & have Check Out instructions to be followed. Do you see more vacation rental parties on each block than regular trouble tenants that don't care about the neighbors, landlords and city properties in those few high crime or low income zip codes? I'm sure you know the numbers & doesn't mean STR is bad just because it's NEW? With the city cap on ONLY 2800 STR applicants accepted, it's just ridiculous for homeowners that needs to pay their mortgage, food, families & etc. Do you know what is the percentage or amount that a homeowner will put into his/her pocket each month for a regular rental AFTER property tax, mortgage, utilities, water reclamation, repairs & not to mention HVAC repairs or replacement (VEGAS HEAT!) amount = TO 5-7 MONTHS OF RENTS!!!!

Hope this RULES will balance & understand STR is not such a bad business for the city & community not only to growth but also to bring people all around the world to come for vacations & work for Las Vegas such as in DTLV example on construction workers that need places to stay for weeks to months! They cannot afford to pay the price of hotel rooms for a group of 4+. Vegas is & still growing & BIG! There WON'T be enough space/rooms in hotels to put all the visitors from California, out of States & countries when there ARE multiple concerts, events, sports (more teams coming like Formula 1). What happens when NOT enough places to stay? What will happen to those businesses/events & etc? Will they still continue to have the same or new events in Vegas again? IT'LL BE A DOMINO AFFECTS!

Thank you!

Kay Hang
H & H Capital Group LLC
848 N. Rainbow Blvd. #144
Las Vegas, NV 89107
HHCapitalGroupLLC@gmail.com
(626) 400-0128

From: [Views Vegas](#)
To: [BL Public Comment](#)
Subject: Licensed STR Host in Support of Tax Revenue and Reasonable Regulation
Date: Thursday, May 19, 2022 12:02:31 AM

Hello Jordan Sandecki,

I am a licensed short term rental (STR) operator in the City of Las Vegas. I have been operating my short term rental house for just over 3 years and in that time I have paid over \$60,000 in room taxes directly to The City of Las Vegas.

I'm happy to pay those monthly tax checks and give back to the community that I love. What I'm not happy with is the overwhelming competition I continue to get from unlicensed operators or the bleak prospects for expanding my business to include a second house.

I'm honored to have been unanimously approved for my STR license by the City Council & Mayor even though It took 14 months of paperwork, registrations, fees, inspections, home updates, neighborhood meetings, and public hearings in order to gain that approval.

My understanding is that there are approximately 200 fellow licensed operators in the city - yet over 2,000 unlicensed operators compete with us. These unlicensed operators pay zero taxes nor do they conform to the fire, insurance, distance separation, noise monitoring, or other stringent requirements placed on us licensed operators.

Many of the unlicensed STR operators do get found, investigated, sent letters, and sometimes they have liens placed on their houses. With enough pressure they sometimes decide to shut down their illegal businesses, however the demand for STRs continues to greatly outstrip the number of licensed operators, so new unlicensed operators continue to pop up in great numbers. They use clever legal techniques to protect themselves such as signing 30 day leases with guests only staying for the weekend, or registering their guests as owners of an LLC so that they are partial owners of the house.

I would like to purchase, remodel, furnish, and operate a second licensed STR, however the city's license requires all STRs to be owner occupied, so there is no way for me to legally operate a second house in the city.

Not only does the owner occupied requirement make it impossible for me to expand my tax paying business in the city, it also makes it difficult to appeal to guests who want an entire house to themselves, yet they only have that option with my 2,000 unlicensed competitors.

Actually, my understanding is that there currently are over 10,000 unlicensed STR operators in Clark County that I am competing with.

My concern is that with strict separation rules already required by AB 363, adding an owner occupied requirement like what the city has will make it impossible for best-in-class operators like me to expand our businesses and you will continue to have the rampant unlicensed, untaxed, unsafe, under-the-radar operators in the county even after this new law is enacted.

The more requirements that are added to this law the less likely it is that legal operators will meet the demand and you will be left with a situation like we already see in the city where

only 10% of us are licensed and paying taxes.

I implore you to pass the Clark County STR licensing law with only the minimum requirements set forth by AB 363.

Let us diligent STR operators meet the demand legally. Gain the maximum tax revenue for the county and know where all the STRs are on the map. If there are bad actors then simply use existing disturbance ordinances to threaten their license.

P.S. My STR has been rated 5 stars by over 150 Las Vegas visitors - many of whom wouldn't have come if not for the ability to rent a house with a kitchen and the privacy to be with their group and away from germ infested elevators. They still spend a lot of money locally!

P.P.S. My house has never once had the police called to it and I enjoy the support of my neighbors. This is due to my strict guest vetting and monitoring - monitoring that can be done just as effectively even when I'm not physically occupying the house with my guests.

Sincerely yours,
Dwight Calwhite
Owner, Views Vegas LLC
702-337-3901 (please call/text me with questions)
viewsvegas@gmail.com

From: [John Lima](#)
To: [BL Public Comment](#)
Subject: Clark County STR ordinance statement/AB363
Date: Thursday, May 19, 2022 12:10:59 PM

I am a Clark County Homeowner who is supporting the Home Share idea of doing STR'S. I believe in the residential use of STR's. There is presently no problem with a homeowner deciding to rent one or two bedrooms out in their own home to offset living expenses. Especially helpful for seniors on a fixed income struggling to meet monthly expenses. I further support and endorse any homeowner that is currently doing STR's and managing their property appropriately and within the Airbnb [guidelines](#). My hope is that we all can come to a workable solution that will satisfy the Clark County Commissioners, The hotels and cooperate donors and our state assembly representatives. This is not a problem that we as a County of Homeowners and Hotel/Casino's can not work through. We can find a solution through fairness and negotiation to respect the rights of Homeowners and government to come to an agreement that works for us all. Please! Let us all work together where there is common ground, to include not exclude our residents and homeowners and guest to our state and county in Nevada.

From: [holly smith](#)
To: [BL Public Comment](#)
Subject: The new STR laws are discriminating
Date: Thursday, May 19, 2022 12:38:58 PM

The new STR laws are discriminating against the mom and pop operators of airbnb rentals to cater to the needs of the corporate Donors who've the money to lobby, bribe through donation to The Country Commissioner.

Counties in Nevada which allow str rentals are running well to the benefit of all constituents and ultimately to the thriving growth of the country.

From: [Trina Trang Dang](#)
To: [BL Public Comment](#)
Subject: New AB 363 opinion
Date: Thursday, May 19, 2022 3:37:10 PM

To Whom It May Concern:

I want to express my concerns about the propose new ordinances on AB 363.

I have few STR rentals in Clark County. I abide by all the rules to get permits and monitor my guests to abide by the rules.

I take care of my neighbors concern so this will not disrupt them.

I do NOT support the new restrictions of 1000 square feet distance , the lottery system of who should get picked to get STR permits, and only 1 permit per owner.

These restrictions will hurt all the good STR owners who do abide by the rules which is very unfair.

My income relies on this business to make mortgage payments, etc.

And this will have a negative economical impact on Clark County as well

Clark county will lose a large amount of income from loss of transient tax , thus will hurt the growth of Clark County

It's not a win win situation for any of us.

Thank you

Trina Trang Dang

From: [being vinod](#)
To: [BL Public Comment](#); [STR Comment](#)
Subject: New STVR rules
Date: Thursday, May 19, 2022 4:14:11 PM

To whom ever it may concern

- We do not support the new ordinances ABA363 especially the lottery system of who should get pick to get STR permits.
- We do not support the 1000 square ft distance
- We do not support allowing only permit per owner
- There are good hosts like us who abide by the rules and it's unfair to punish the good host
- If Restrict more things, it will enforce more STR business to go underground .

And this will have a negative economical impact on Clark County AND STR Home Owners.
Clark county will lose a large amount of income from loss of transient tax , thus may cause job loss for the Clark County employees and stagnate growth for Clark County
We all loose.

Thank you

From: [Nellie Vo](#)
To: [BL Public Comment](#)
Subject: Do not support the new ordinances
Date: Saturday, May 21, 2022 5:06:56 PM

Hello,

- We do not support the new ordinances ABA363 especially the lottery system of who should get pick to get STR permits.
- We do not support the 1000 square ft distance
- We do not support allowing only permit per owner
- There are good hosts like us who abide by the rules and it's unfair to punish the good host
- If Restrict more things, it will enforce more STR business to go underground .

And this will have a negative economical impact on Clark County AND STR Home Owners.
Clark county will lose a large amount of income from loss of transient tax , thus may cause job loss for the Clark County employees and stagnate growth for Clark County
We all loose.

Please reconsider,
Thank you,

Nelli Vo
Sent from my iPhone