

From: [Susan Brown](#)
To: [Public Testimony](#)
Subject: Updated KCSTRA Position Statement re STR Ban
Date: Monday, April 17, 2023 9:19:55 PM

Regarding updated Committee Substitutes: Ordinance 230267 and 230268 amending Chapter 88 and 56 regarding Short Term Rental (STR) regulations. Also, a Compromise in response to Southmoreland Neighborhood Association Position Statement dated April 15, 2023

**The KC Short Term Rental Alliance (KCSTRA) represents the voice of Kansas City's licensed STR operators. We do not condone or support unlicensed operators. **

The KCSTRA respectfully submits this response:

Ideally, we would be participating in a more formal full stakeholder process with the Neighborhood Groups and the City to update the STR Ordinances, but in lieu of that we are dependent on information we find in the public sphere. We believe we have an idea for a compromise with impacted Neighborhoods based on public comments submitted by the Southmoreland Neighborhood Association on April 15, 2023. This likely could be representative of many of the impacted Neighborhoods since they reference a larger Midtown Neighborhoods Working Group that has been working with the Mayor and Councilman Bunch. We have not been part of this process although we would welcome that inclusion. Their comments are as follows:

... the Southmoreland Neighborhood Association is writing to share our support for committee substitutes to Short Term Rental Ordinances 230267 and 230368 in a form that support the following criteria:

- *Neighbor consent should continue to be required, although a reasonable compromise is disallowing non-resident STRs in R zoning and enacting density requirements.*
- *Quality of life protections, for both neighbors and guests, should continue to be required including the limits on the number of guests and prohibition of parties/events.*
- *Current permitted STRs should be required to re-register under Chapter 56 once their permit expires, and will be expected to comply with all requirements except the zoning and density requirement as long as the registrant or ownership does not change.*
- *The booking platforms must be required to remove any unregistered or deregistered STR.*
- *The Neighborhood Services Department must be committed to actively enforcing the Ordinance to address violations and shut down STRs that are illegally operating or failing to comply with the Ordinance.*

1. We are in agreement with all the bullet points except for the second half of their first point. The Southmoreland response starts with “Neighbor consent should continue to be required...” indicating this is the most important item for them. They say a “reasonable compromise is disallowing non-resident STRs in R Zoning...” We are in agreement that Neighbor Consent would be preferable over a Ban*. A Ban would destroy many small businesses, result in years of costly legal challenges, and is likely not the intent of Council. Staff mentioned to us a mechanism whereby the City would manage Neighbor Consent

requests with a limited time frame for response that seems workable.

*A prohibition in the Residential Neighborhoods of non-resident STRs is effectively a Ban on Non-Resident STRs for local small business owners. Commercial Buildings in Business Zones require commercial financing which is more expensive and difficult for local small businesses owners to obtain than Mortgage loans – effectively eliminating this path for anyone other than large commercial developers, including those from out of state.

2. We also believe we are more closely aligned with Neighborhoods on Density than previously thought. Also, from the Southmoreland document, it states “1000 ft would essentially allow for approximately one STR per block.” We were shown a map where it appeared that 1000ft would take out up to 30 block faces. We feel 1/block is fair and it is also a better way to describe the Density requirement. It is easier to visualize and easier for Neighbors to report the unlicensed that way. Density requirements of 1/block along with some form of Neighbor Consent could work for all of us.

3. Finally, we agree with Southmoreland’s comment “We are concerned this process is being rushed...” We believe instituting a moratorium with a specific deadline to give us all time to work within a structured task force environment including Neighborhoods, Legal STR Operators and City Staff would be appropriate. We believe we have valuable input that will result in a better long-term solution.

Respectfully,

KC Short Term Rental Alliance

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About Us

The KC Short Term Rental Alliance represents only legally licensed Short Term Rental Owners and Hosts along with interested Individuals and Associated Businesses. Our mission is to balance a thriving Short Term Rental Community while supporting both property ownership rights and neighborhoods. We collaborate with and educate our Community, Public Officials, Short Term Rental Owners/Hosts and Associated Businesses. █