

## Andrew Orr

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**From:** Walter Green <greenwr7@gmail.com>  
**Sent:** Saturday, November 9, 2019 8:48 AM  
**To:** ZoneFranklin  
**Subject:** Zone Franklin Comments

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I live at 227 4<sup>th</sup> Ave South and am a board member of the Franklin Downtown Neighborhood Assn, the DNA. The DNA's most important duty is to advocate for the neighborhoods within its boundaries. Our boundaries most closely resemble those of residential district R-4 that is proposed in Franklin's Zoning Ordinance Update.

Until recently, almost NO ONE knew that there were so many Short-term Vacation Rentals (STVR's) in Franklin (about **250**) or in R-4 (about **100**). Now, STVR's are not all bad. What is TROUBLING, however, is that so many (about **40%**) have no owner permanently residing on-site. The DNA is very concerned about the non-owner-occupied STVR's in R-4.

Why? Here are some of the reasons:

First, R-4 is intended to be strictly residential. Short-term rentals are BUSINESSES – THEY ARE SMALL HOTELS. The ones that have NO OWNER LIVING ON-SITE (non-owner-occupied) are SMALL HOTELS WITH NO ON-SITE MANAGER. THERE IS NOTHING RESIDENTIAL ABOUT THEM AND THEY SHOULD NOT BE IN R-4 !! BUT THEY ARE!! The proliferation of STVR's has put about **40** of these non-owner-occupied rentals in R-4.

Also, non-owner-occupied STVR's replace neighbors with small hotels that are either empty or are occupied by transients. This creates voids in our residential areas, damaging the character and connectivity of our neighborhoods.

AND, because STVR's are typically located in our smaller, less expensive properties, they reduce the inventory of affordable housing.

The Zoning Ordinance Update calls for newly permitted STVR's within R-4 to have an owner permanently occupying the premises and limits the number of rentals to one per lot. The DNA Board of Directors has voted overwhelmingly to SUPPORT that language. We ALSO feel strongly that the existing non-owner-occupied rentals

in R-4 should be eliminated as soon as possible and ask the City to add WHATEVER resources are needed to monitor ALL STVR's and to strictly enforce appropriate rules.

Thank you.

Walter Green