

SUPPLEMENTAL PUBLIC COMMENT AND PROPOSED AMENDMENT

Draft Ordinance No. 23 | Owner-Occupied STR Tier

For the September 10, 2026 Second Reading / Public Hearing

To	Teller County Board of County Commissioners
From	Vanessa Haakenson, homeowner and resident of unincorporated Teller County
Re	August 7, 2026 Draft Ordinance No. 23: Regulation of Short-Term Rental Properties
Date	September 5, 2026

PURPOSE

I am submitting this amendment package in advance so the County Attorney and staff have time to review ordinance-ready language before the September 10 hearing. My primary request is to implement the Owner-Occupied STR tier the Board previously contemplated, while preserving the County's core health, safety, occupancy, parking, nuisance and enforcement standards.

Requested Amendments at a Glance

- 1. Owner-Occupied Tier Qualification (new Section 2(14)).** Use the existing primary-residence definition in Section 2(5), with onsite residency during guest stays as the condition for reduced-tier treatment.
 - 2. License Fee Structure (Section 6).** Retain the \$250 initial application fee; establish annual fees through the Teller County Fee Schedule, as adopted or amended by Board resolution; set the initial Owner-Occupied Tier annual fee at \$100.
 - 3. First-Renewal Inspection (Section 3(16)(b)).** Do not require the automatic first-renewal inspection for an Owner-Occupied Tier property in good standing; preserve inspection authority for complaints, violations and other cause under Section 3(16)(c).
 - 4. Insurance (Section 4(2)(g)).** Allow qualifying marketplace-provided liability coverage to satisfy the \$1 million requirement while all bookings are made through the qualifying marketplace.
 - 5. Neighbor Notification (Sections 3(18) and 4(2)(n)).** Treat notice as a one-time informational requirement for Owner-Occupied Tier properties; no neighbor approval or consent.
 - 6. Plans (Sections 3(10), 4(2)(d)-(e)).** Clarify that accurate owner-prepared scaled plans are acceptable and existing County records may be incorporated.
 - 7. OWTS Renewal Interval (Section 4(2)(l), lower-priority request).** Keep the initial qualifying OWTS inspection; for Owner-Occupied Tier renewals, allow the same report for up to three years absent evidence of deficiency, failure, changed occupancy or other lawful cause.
 - 8. Annual Program Report and Fee Review (new Section 6(5)).** Report license counts by tier, complaints, inspections, enforcement activity, revenues and reasonably available program costs so future fees can be calibrated to actual experience.
- Priority if the Board adopts only one change:** the separate Owner-Occupied fee tier in Section 6. My next priorities are the first-renewal inspection exception and the conditional marketplace-insurance provision.

Suggested Motion

"I move to adopt Ordinance No. 23 with amendments establishing an Owner-Occupied STR Tier substantially consistent with the supplemental public comment and proposed amendment submitted by Vanessa Haakenson dated September 5, 2026, and direct the County Attorney and staff to make any necessary conforming changes. I further move that annual STR license fees be established through the Teller County Fee Schedule, as adopted or amended by resolution of the Board, with the initial annual fee for the Owner-Occupied STR Tier set at \$100 and the \$250 initial application fee retained."

Fallback only if counsel determines the amendments cannot be incorporated at second reading: continue final action only as long as necessary for County Attorney review and conforming language.

Supplemental Public Comment

Commissioners, I previously submitted written comment supporting reasonable STR regulation while asking the County to treat owner-occupied home-sharing proportionately. This supplemental comment is narrower. It provides a specific Owner-Occupied STR amendment package that can be reviewed before the September 10 hearing and incorporated without requiring the Board to restart the ordinance.

The official Teller County STR information page identifies the operative draft as the **August 7, 2026 Draft Ordinance No. 23**, not an August 8 draft. The section references below were checked against that 19-page August 7 version.[1]

1. The Board already created the foundation for a tier

The current draft defines an Owner Occupied STR in Section 2(5) by primary-residence documentation and exempts Owner-Occupied STRs from the 10% license cap in Section 9(5).^[2] The June 9, 2026 Community Development memorandum goes further: all three Commissioners reached consensus on “Resident Priority,” including lower fees as one possible mechanism, and on tiered permit types: Tier One - Owner Occupied; Tier Two - Resident, not owner occupied; Tier Three - Non-Resident.^[3]

This proposal does not ask the Board to invent a new policy direction. It asks the Board to finish implementing a distinction it has already recognized.

2. Why a lower owner-occupied fee has a cost-causation basis

Owner-occupied STRs have characteristics that reasonably reduce several sources of regulatory burden addressed by Ordinance No. 23. Under the proposed tier, either the Owner or another verified primary resident is onsite during guest stays and can respond directly to guest conduct, parking, noise, trash, property condition and neighborhood impacts. When the Owner meets the requirements of Section 2(8), the Owner may also serve as the Local Agent; otherwise, the existing Local Agent requirements remain in effect. These structural differences provide a rational basis for a separate fee tier unless County data demonstrate comparable administrative and enforcement costs across STR categories.

The June 9 memorandum reports that four third-party monitoring companies estimated 300-500 STRs operating in unincorporated Teller County. The same memorandum modeled a roughly \$300,000 annual program and 'backed into' per-license cost based on the number of licenses, including \$750 at 400 licenses. The records I have reviewed do not contain a verified breakdown showing how many of the estimated STRs are owner-occupied home-sharing operations versus non-owner-occupied whole-home or other operations.[4]

CORA-produced consultant presentations also show that the public estimate changed materially during the policy process: approximately 2,000 active STRs in a July 16, 2025 presentation; a revised range of 450-2,000 in a July 30 presentation; and later 300-500 in the June 2026 staff memorandum. I am not asking the Board to resolve that history in this amendment. I am asking the Board not to assume, without tier-level data, that every operating model creates the same regulatory cost.[5]

3. A uniform fee can work against the County's own registry

The program's revenue assumption and the number of participating licensees are interdependent. A high uniform annual fee can cause low-volume resident hosts to leave the STR market or shift to 30-plus-day rentals. That reduces the number of licenses available to support a program whose per-license cost was calculated by dividing projected program costs across an assumed license population. A proportionate resident tier can therefore support voluntary compliance and a more complete registry, not merely reduce costs for hosts.

4. My operation illustrates the distinction

I am directly affected by this ordinance. I first hosted in 2018 and resumed hosting in 2026. I currently rent two rooms within the home where I live rather than operating a separate whole-home vacation rental. During my periods of hosting, I have had no neighbor complaints and no County complaint or code-enforcement contact related to my hosting. My Airbnb profile reflects 46 reviews and an overall rating of 4.89 out of 5.

That experience does not prove that every owner-occupied STR has the same risk profile. It does demonstrate why the category matters: when the Owner or another verified primary resident is onsite, there is immediate oversight and accountability before an issue needs to become a County enforcement matter.

5. A nearby local framework already distinguishes primary residences

Woodland Park separately identifies Primary Residence and Non-Primary Residence STRs. Its 2026 application requires at least one primary resident to live onsite throughout the visitor's stay for a Primary Residence STR, lists a \$100 zoning-development permit fee, and the City separately requires a \$35 annual business license. Woodland Park and unincorporated Teller County have different revenue structures, so this is not offered as a dollar-for-dollar comparison. It is a nearby example showing that resident-hosted STRs can be separately identified and regulated without treating them as identical to non-primary-residence operations.[6]

6. Requested fee structure

I support retaining the \$250 initial application fee. Initial review requires staff time, and an affected host should contribute toward that work. For annual renewal, I request that fees be established through the Teller County Fee Schedule, as adopted or amended by resolution of the Board, rather than hard-coded as a single \$750 amount in the ordinance. The initial annual Owner-Occupied Tier fee should be \$100, consistent with the County's prior resident-priority framework and subject to later adjustment based on actual experience.

This approach gives the Board flexibility. It can adopt Ordinance No. 23 on schedule, preserve a resident-host tier in the ordinance, and recalibrate fees later without reopening the entire ordinance.

7. The remaining requests are targeted, severable changes

The inspection, insurance, notification, plan, OWTS and reporting changes in Attachment A are drafted so the Board can adopt them independently. If the Board or Public Health does not support the requested OWTS renewal interval, that provision can be omitted without affecting the fee tier, inspection exception or insurance provision.

I am not asking Teller County to exempt Owner-Occupied STRs from lawful occupancy, wastewater capacity, parking, noise, fire-safety, emergency-notification, nuisance, trash, advertising or enforcement requirements. I am asking for a proportionate pathway for a resident-hosted primary residence.

Requested Action

Please amend Ordinance No. 23 substantially consistent with Attachment A. If the County Attorney recommends different drafting to accomplish the same substance, I welcome those conforming changes. I am submitting this proposal in advance specifically so counsel and staff have an opportunity to review it before the September 10 hearing.

If the Board adopts only one substantive change, I respectfully ask that it establish the separate Owner-Occupied STR fee tier.

**Respectfully submitted,
Vanessa Haakenson
Teller County homeowner and resident
Unincorporated Teller County | Woodland Park mailing address**

ATTACHMENT A

Proposed Redline Amendments to August 7, 2026 Draft Ordinance No. 23

Drafting convention: strikethrough = proposed deletion; underline/bold = proposed addition. This language is offered for County Attorney review and conforming edits.

A-1. Section 2 - Definitions

Add new Section 2(14) after current Section 2(13) "Bedroom":

(14) Owner-Occupied STR Tier. An STR that qualifies as an Owner Occupied STR under Section 2(5) and in which the Owner, or another verified primary resident of the property, resides onsite during periods in which the STR is occupied by STR guests. The property must continue to satisfy the primary-residence requirements of Section 2(5). When onsite occupancy is provided by another primary resident rather than the Owner, that resident's status shall be established by documentation reasonably acceptable to the County.

No separate bedroom cap is proposed. Existing occupancy, OWTS, parking, building and life-safety limits remain controlling.

A-2. Section 3(16)(b) - First-Renewal Inspection

Current text, with proposed addition:

(b) The County shall conduct an inspection prior to first renewal of a license to verify the items in the Owner's attestation. This subsection (b) shall not apply to a property qualifying for the Owner-Occupied STR Tier that is in good standing and has no documented violations. Nothing in this exception limits the County's inspection authority under subsection (c).

A-3. Section 3(18) and Section 4(2)(n) - Neighbor Notification

Add to the end of Section 3(18):

For a property qualifying for the Owner-Occupied STR Tier, notice under this subsection is a one-time informational notice required at initial licensing. Neighbor approval or consent is not required. Additional notice shall not be required upon renewal unless ownership or eligibility for the Owner-Occupied STR Tier changes.

Add to the end of Section 4(2)(n):

For a property qualifying for the Owner-Occupied STR Tier, proof of the one-time notice required by Section 3(18) satisfies this subsection for subsequent renewals while ownership and tier eligibility remain unchanged.

A-4. Sections 3(10), 4(2)(d) and 4(2)(e) - Plans

Add the following paragraph after Section 4(2)(e), applicable to Sections 3(10), 4(2)(d), and 4(2)(e):

For purposes of Sections 3(10), 4(2)(d), and 4(2)(e), for a property qualifying for the Owner-Occupied STR Tier, owner-prepared scaled site and floor plans are acceptable if reasonably accurate and complete. Existing County records may be incorporated by reference where they contain information required by those sections. Professional preparation shall not be required solely for STR licensing unless the County determines that additional documentation is reasonably necessary to evaluate compliance.

A-5. Section 4(2)(g) - Insurance

Current text, with proposed addition:

(g) Proof of insurance covering property damage and bodily injury related to use of the STR in an amount of not less than one million (\$1,000,000) per claim in the aggregate. Such coverage shall be maintained for the term of the license. For a property qualifying for the Owner-Occupied STR Tier, documented liability coverage furnished through a Short-Term Rental Service may satisfy this subsection for reservations conducted exclusively through that service if the coverage meets or exceeds the amount and scope required by this subsection. Acceptance of a reservation outside qualifying marketplace coverage requires the Licensee to maintain separate coverage satisfying this subsection.

A-6. Section 4(2)(l) - OWTS Inspection Interval for Renewals

Add to the end of Section 4(2)(l):

Notwithstanding the 365-day requirement above, after initial licensing a property qualifying for the Owner-Occupied STR Tier may use a qualifying third-party inspection report for renewal applications for up to three (3) years from the date of inspection, provided there is no documented evidence of deficiency or failure, no proposed occupancy above approved design capacity, and no other lawful basis for requiring an earlier inspection. Nothing in this provision limits requirements imposed by otherwise applicable OWTS regulations.

This is a lower-priority request and is intended to be severable from the remaining amendments.

A-7. Section 6 - STR License Fees

Section 6(1) - no substantive change requested:

(1) All license and application fees shall be set forth by the Teller County Fee Schedule adopted by the Board of County Commissioners.

Section 6(2) - retain the initial application fee:

(2) Application fee. A non-refundable application fee of \$250 is due upon the initial application submittal.

Replace Section 6(3):

~~(3) Annual license fee. The annual STR license fee is \$750 and must be paid upon approval of the initial application for the issuance of the license and upon approval of a renewal license.~~ (3) Annual license fee. Annual STR license fees shall be established through the Teller County Fee Schedule adopted or amended by resolution of the Board and may vary by STR tier. The initial annual license fee for a property qualifying for the Owner-Occupied STR Tier shall be \$100 and shall be due upon issuance of the initial license and each renewal.

Retain Section 6(4), with a clarifying addition:

(4) Fees may be adjusted from time to time by a resolution of the Board in its discretion to manage the costs of regulating STRs. In adjusting fees, the Board may consider documented administrative and enforcement experience by STR tier.

Add new Section 6(5):

(5) Annual Program Report. County Administration shall provide the Board an annual STR program report identifying, to the extent reasonably available, the number of active licenses by tier, complaints, inspections, notices of violation, enforcement actions, program revenues, and administrative or enforcement costs associated with the program. The report may be used to inform future fee adjustments.

A-8. Section 9(5) - License Cap

No change requested. Current text should remain:

(5) Owner-Occupied STRs are exempt from the STR license cap.

A-9. Technical Cross-Reference Corrections

These are housekeeping corrections identified while checking the August 7 draft:

Section 4(2)(f): "Proof of Residency as defined in Section 2 for applicants seeking an STR license that is exempt from the caps outlined in ~~Section 6~~ Section 9."

Section 8(2): "During this initial grace period, the cap on the number of STR licenses imposed by ~~Section 6~~ Section 9 shall not apply to Existing STR operators."

A-10. General Conforming Clause

Except for the specific alternative provisions applicable to the Owner-Occupied STR Tier, properties in that tier remain subject to all other applicable provisions of this Ordinance.

A-11. Existing Provisions That Support the Tier

- Section 2(5) already defines Owner Occupied STR through proof of primary residence.
- Section 2(8) already permits the owner to serve as Local Agent if the owner meets the stated response and access requirements.
- Section 5 already requires applicant self-certification of life, health, safety, welfare and fire-safety standards.
- Section 9(5) already exempts Owner-Occupied STRs from the STR license cap.

Source Notes

1. Teller County, "Short-Term Rental Information," identifying "2026 08 07 Draft Ordinance No. 23: Regulation of Short-Term Rental Properties in Unincorporated Teller County"; official draft PDF dated August 7, 2026.
2. Teller County, Draft Ordinance No. 23, Aug. 7, 2026, Sections 2(5), 2(8), 3(10), 3(16), 3(18), 4(2), 5, 6, 8, and 9(5).
3. Teller County Community Development Department, Memorandum to Board of County Commissioners, "STR Ordinance," June 9, 2026, Section 2 consensus items: Resident Priority and Tiered Permit Types.
4. Id., fee and program-cost discussion: four third-party monitoring companies indicating 300-500 active STRs; approximately \$300,000 worst-case annual program model; \$750 per license at 400 licenses.
5. CORA-produced consultant community presentations reviewed by commenter: July 16, 2025 presentation (approximately 2,000 active STRs / 12-14% framing) and July 30, 2025 revised presentation (450-2,000 range). Copies are available from commenter for verification.
6. City of Woodland Park, 2026 Short-Term Rental Application (revised Dec. 10, 2025), including Primary Residence / Non-Primary Residence categories, \$100 Zoning Development Permit fee, and requirement that at least one primary resident live onsite throughout a visitor's stay; City Short-Term Rental Resource Center, \$35 annual business license.

Section-number verification note. All ordinance section references in this filing were checked against the official 19-page August 7, 2026 draft posted on Teller County's STR information page. The official draft also states in Section 2(10) that the first reading occurred on August 6, 2026.