

Community Development

125 NW Chehalis Avenue Chehalis WA 98532

MEMORANDUM

June 30, 2025

This is a follow-up memo to respond to questions and comments from the June 23, 2025, Community Meeting, held in Packwood, regarding the proposed Short Term Rental (STR) regulations. The <u>Comprehensive Plan Periodic Update webpage</u> includes all of the materials, including the proposed regulations, located under Task 10, and the presentation from the community meeting. This memo will be posted to the webpage as well. Additional questions should be directed to Mindy Brooks at <u>mindy.brooks@lewiscountywa.gov</u> or 360-740-2610.

The June 24 Community Meeting had 184 attendees, 66 in person and 118 on Zoom. A comment card was provided for anyone who wanted to fill it out. There were six comment cards turned in. Of those three supported regulating STRs and three did not. While this is a very low number of responses, the split is indicative of overall opinions shared throughout the full Packwood Subarea planning process from 2022 to today.

There were three overarching topics that staff said they would provide a written response to: potable water standards, limits on occupancy as it relates to septic systems and solid waste management. Each is included in this memo. Following those topics there are maps of the neighborhoods where the 25% is proposed to apply. Not all of the neighborhoods are included; staff have included the neighborhoods that have a high percentage of existing STRs. The data about what the cap would mean is also included for those neighborhoods.

Planning Commission Steps To-Date

The Packwood Community Advisory Committee proposed STR regulations for the Packwood Urban Growth Area (UGA) only. Those were transmitted to the Lewis County Planning Commission on May 16 and the subject of a Planning Commission workshop on May 27 (material can be found here). At the workshop, the commissioners requested that the STR regulations be considered for application countywide and requested additional regulations be added to the proposal. The commissioners asked that the changes be included in the June 18 draft to be part of the public hearing on July 8. The amended countywide STR regulations were discussed at the Planning Commission workshop on June 24 (materials can be found here). The Planning Commission meetings are available on YouTube.

Summary of the STR Regulations

The <u>proposed regulations</u> have not been adopted and are subject to change throughout the public hearing process. If the proposed regulations are adopted as drafted on June 23, 2025, every STR in Lewis County would be required to obtain a permit. To obtain a permit, the STR will need to be a legal residential structure, have a functioning septic system, meet potable water standards, have a solid waste service and garbage cans must be stored indoors (e.g., garage or shed), have one on-site parking space per bedroom, have a sign inside with basic information such as quiet hours and outdoor burn restrictions, post a contact name outside in view of a road and must have a UBI and insurance as required by the state. In addition, there would be two limitations on all STRs in Lewis County:

- 1. Where there are up to two (2) dwelling units on a single parcel, no more than one (1) dwelling may be provided as STR. Where there are up to three (3) dwelling units on a single parcel, no more than two (2) dwellings may be provided as STRs. Where there are four (4) or more dwelling units, none can be provided as STR unless the multifamily incentives are utilized (See UBA Small Town regulations). For the purposes of this subsection, a detached bedroom shall be considered a dwelling unit.
- 2. The occupancy limit would be two (2) people per bedroom, plus an additional 3 people.

In the UGA – Small Towns, which are Packwood and Onalaska, and the LAMIRD Type 1 neighborhoods, which are the properties zoned Rural Residential Center, Small Town Residential, Commercial Crossroads and Small Town Mixed Use, no more than 25% of the existing dwelling units may be provided as STR. This 25% cap would not apply outside of the UGA – Small Towns and LAMIRD Type 1 neighborhoods. Please see the final section of this memo for more details.

Potable Water Standards

All STRs would be required to meet the minimum potable water standards as required by Washington State and implemented by Lewis County Environmental Health. Pursuant to WAC 246-291-005, a Group B Water System is applicable to STRs with fewer than 25 people per day or more than 25 people per day for fewer than 60 days per year. The reason is public health and safety. A STR owner or operator would need to demonstrate a legal water source, such as a well, that meets the minimum Group B Water System standards. This is important for public health.

Occupancy Limits

The maximum occupancy would be 2 people per bedroom plus an additional 3 people. For example, a 3-bedroom cabin can have a total of 9 occupants. This would be enforced based on the listing information. Children under the age of 2 years old do not count.

Residential structures in Lewis County are primarily on septic systems and those systems are designed based on 2 people per bedroom living in the house. The concern for STRs is "surge capacity" and "settling" time. Homes have a septic system that is designed for residential use. Higher than the calculated usage, for example a high burst of use by having 16 people staying in a 3-bedroom house for a long weekend, can overload the septic system by exceeding the surge capacity and not providing sufficient time for the multiple components of septic waste to settle.

This can result in wastewater backing up into drains, surfacing in yards or, in some cases, causing the septic system to fail. Buildings that expect high surge use, such as a church or an event center, design the septic system to accommodate that need. But residential structures are not built to accommodate excessively high surge use. Setting an occupancy limit will reduce the risk of septic system failure.

When a septic system fails it impacts the property owner, and it can create a public health and environmental threat by fats, oils, soaps and feces seeping into areas where people can come into contact with it or where it can get onto nearby properties or into streams.

Solid Waste Management

STR owners or operators would be required to show that they have solid waste services and that the garbage cans are stored indoors. Guests cannot be expected to take their garbage home with them, and it is not appropriate to leave full, unattended garbage cans out in rural areas with elk, deer and bears and where people may not be at the house for many days before the garbage is picked up. Garbage associated with STRs being left out is a problem in Lewis County. Also, STR guests illegally dump garbage in private business dumpsters. STRs are different than homes that people live in. When people live full time in the rural area, if an animal gets into their garbage, they are likely to clean it up quickly because they are at home.

25% Cap Estimates

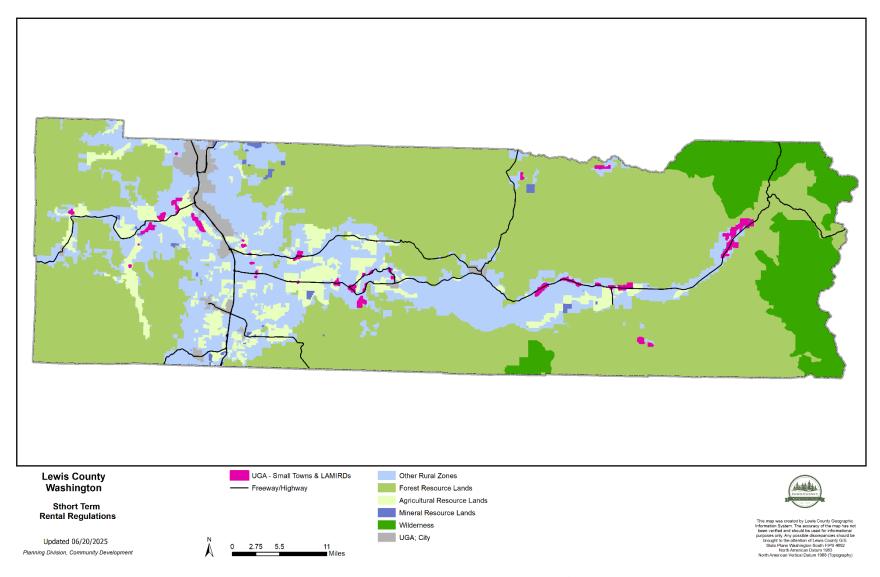
Within Urban Growth Area – Small Towns (UGA) and LAMIRD Type I neighborhoods (RRC, STR, CC, STMU zoning designations), no more than 25% of existing dwelling units within each individual UGA or neighborhood can be permitted as STR. Below are maps of Ashford, Goat Rocks, High Valley, Mayfield, Mineral, Packwood and Timberline – each neighborhood that would have the cap is shown in pink. These areas were chosen for the memo because they have the highest concentration of STRs, outside of cities, in Lewis County. There are additional UGAs and LAMIRD Type I neighborhoods that would be included in the 25% cap (e.g., Glenoma, Sliver Creek, Curtis Hill, Adna, etc.); however, those neighborhoods have very low concentrations of STRs at this time.

For each mapped UGA and LAMIRD area, there is a summary of the estimated total existing dwelling units, total STRs and if there would be capacity for additional STRs. The data is from the Lewis County Office of the Assessor, June 2025. If the 25% cap is adopted, the information will be updated annually.

Table 1: Short Term Rental Estimated Capacity

	Existing Dwelling units	Allowed STRs (25%)	Est. STRs	STR Capacity
Ashford	392	98	124	0
Goat Rocks	44	11	9	2
High Valley	965	241	222	18
High Valley Park	24	6	5	1
Mayfield (grouped)	420	105	34	71
Mineral	35	9	15	0
Packwood (grouped)	462	117	108	9
Timberline	291	72	67	9

It has been recommended by staff to allow a "grace period" during which any STR owner or operator may obtain a permit regardless of the cap, if all other requirements are met. This is recommended to ensure that existing STRs can become permitted before opening up additional permits to new STRs. In neighborhoods where the number of STRs already exceeds a 25% cap, such as Ashford and Mineral, <u>all</u> existing STRs would be eligible for the permit during the grace period if the requirements are met. Staff have recommended a 6-month grace period; however, that is an important point of discussion.



The proposed 25% cap would apply to the areas shown in pink on the map. Outside of the UGA – Small Towns and LAMIRDs, there would not be a cap on the total number of STRS; however, the other regulations would apply.

