



Lewis County Planning Commission
Public Hearing
Comprehensive Plan Periodic Update
Development Regulation

WRITTEN TESTIMONY

June 18 - July 21
2025

From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Email from Commissioners Contact Form
Date: Friday, June 20, 2025 10:21:33 AM

Kate Chatterton

Administrative Assistant Sr

Lewis County Board of County Commissioners

360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: contact@lewiscountywa.gov <contact@lewiscountywa.gov>
Sent: Wednesday, June 18, 2025 8:04 AM
To: Tammy Martin <Tammy.Martin@lewiscountywa.gov>; Rieva Lester <Rieva.Lester@lewiscountywa.gov>; BOCC <BOCC@lewiscountywa.gov>
Subject: Email from Commissioners Contact Form

Name: Swope

Email: tom.mattioli@yahoo.com

Message: In recent years, the rise of short-term rentals (STRs) has sparked considerable debate across many communities, including those in Lewis County. While opponents often raise concerns about potential disturbances, changes in neighborhood dynamics, and the impact on long-term housing availability, a closer examination reveals that short-term rentals can significantly benefit the local economy, enhance the experience for nature lovers, provide valuable income for property owners and cleaning teams, and even contribute to the overall improvement of neighborhoods. ****Boosting the Local Economy**** One of the most compelling arguments for short-term rentals in Lewis County is their positive impact on the local economy. STRs attract visitors who are eager to explore the natural beauty and outdoor recreational opportunities that the area has to offer. By providing additional accommodations, short-term rentals help to meet the demand from tourists, thus encouraging them to spend money in local businesses such as restaurants, shops, outdoor equipment rental places, and tour guides. This influx of visitors not only supports existing businesses but also creates new opportunities for entrepreneurs, ultimately leading to job creation and increased economic activity in the region. ****Serving Nature Lovers**** Lewis County is renowned for its stunning landscapes, outdoor activities, and recreational opportunities, including hiking, fishing, and camping. Short-term rentals provide an essential service to nature lovers seeking a place to stay while they explore these attractions. Many travelers prefer the comfort and convenience of a home-like setting rather than traditional hotel accommodations, particularly when traveling with family or groups. STRs can offer a unique experience that helps visitors connect

with the natural surroundings, fostering a deeper appreciation for the region's beauty and encouraging them to return in the future. By catering to the needs of these nature enthusiasts, short-term rentals can help promote sustainability and conservation efforts in Lewis County.

****Providing Additional Income for Owners and Cleaning Teams**** For homeowners, short-term rentals present an opportunity to generate additional income, which can be especially valuable in a region with fluctuating economic conditions. Many homeowners utilize their properties as STRs when they are not in use, allowing them to offset mortgage costs and other expenses.

This additional income can have a cascading effect on the local economy, as homeowners are likely to reinvest in their properties, spend money in the community, and contribute to the overall economic health of Lewis County. Furthermore, the demand for short-term rentals also creates jobs for cleaning teams and property managers, providing employment opportunities for local residents and further strengthening the community's economic fabric. ****Upgrading Neighborhoods**** Contrary to the belief that short-term rentals can lead to neighborhood decline, evidence suggests that they can actually enhance the quality of neighborhoods.

Homeowners who enter the short-term rental market often invest in renovations and upgrades to make their properties more appealing to guests. This investment can lead to improved property values and a more attractive neighborhood overall. Moreover, responsible STR owners tend to take pride in their properties and maintain them to a high standard, which can encourage neighboring homeowners to do the same. The result is a community that benefits from increased property aesthetics and a heightened sense of pride among residents.

****Minimal Disturbances and Responsible Hosting**** Concerns about increased parties and disturbances are common in discussions about short-term rentals. However, there is little evidence to suggest that STRs in Lewis County have led to significant disruptions in the neighborhoods where they operate. Many responsible hosts prioritize the comfort and well-being of their guests and neighbors, implementing strict rules about noise and conduct.

Additionally, local regulations can be established to manage STRs effectively, ensuring that property owners maintain accountability and respect for their surrounding communities. In conclusion, short-term rentals in Lewis County present a multifaceted opportunity for economic growth, enhanced visitor experiences, and neighborhood improvement. By embracing this trend, the community can reap the benefits of increased tourism, additional income for homeowners and local businesses, and a more vibrant and attractive neighborhood.

When managed responsibly, short-term rentals can coexist harmoniously with the existing community, making them a valuable asset to Lewis County's future. Tom Mattioli

User Agent: Mozilla/5.0 (Linux; Android 10; K) AppleWebKit/537.36 (KHTML, like Gecko)

Chrome/124.0.0.0 Mobile Safari/537.36

IP Address: 192.168.247.7

Land Use Summary

Questions/comments

LCC 17.42.017

17.42.017 Minimum lot size summary.

Except within an Small town urban growth area, See Table 1 **which** includes the minimum lot size requirements of this section. **Alternatively end sentence at Table 1.**

17.42.020 Land Use Summary

See Table 2 of this section. **In table heading, is "UGA" thee same as "UGA-City" If so, relabel as such. This table is getting very lengthy, but works for me, as all uses in all zones is presented in one place.**

Footnotes to table 2

Footnotes

1

Multifamily residential housing, which is three (3) or more dwelling units per parcel, is allowed if there is a centralized wastewater treatment facility with adequate capacity. In LAMIRDS, no more than four (4) dwelling units per parcel is allowed. **What about centralized water?**

2

In the Residential High (RH) zone, new accessory dwelling units are permitted if there is an existing primary single-family residence dwelling on the lot. **Only if there is no sewer available. Reasoning: If there is a single single family use on the site, it is a grandfathered use as this zone is not designed for single family and the single family aspect should not be expanded.**

3

New single family residential dwellings are allowed in the Rural High (RH) and Mixed Use (MU) zones if there is no sewer available within 200 feet of the parcel. **Single family allowance if for a "holding zone" aspect only. Allowing something on site even though it is not appropriate in this zone.**

4

New single family residential dwellings and outbuildings such as a garage associated with a single-family residence dwellings are allowed in the Mixed Use (MU) zone as live work, pursuant to 17.17.250

Multifamily

Questions/comments

LCC 17.142.160

17.142.160 Multifamily housing in LAMIRDs.

(1) Multifamily housing is only allowed in LAMIRDs that have centralized water and wastewater facilities that are able to accommodate the density of the units. Is there a definition of centralized water and wastewater facilities? For example, I believe that a LOSS with a number of septic tanks is a centralized wastewater facility as long as the system is covered under a single ownership or maintenance agreement as long as it serves 7 or more units. Can a centralized wastewater treatment facility be privately owned?

(2) The density of a multifamily housing development shall not exceed four (4) units per lot 24 units per acre. It is not possible to have multi family housing on a single lot if 1 above is true.

From: [Nick Truckey](#)
To: [Mindy Brooks](#)
Subject: Re: Request for Clarification and Consideration on STR Regulations, Zoning, and Tax Impacts in Timberline
Date: Friday, June 20, 2025 10:21:04 AM

You don't often get email from truckeyfi@gmail.com. [Learn why this is important](#)

Yes, please see the final version of the testimony below:

Public Testimony for July 8 Planning Commission Hearing Submitted by: Nick Truckey Property Owner – Timberline Neighborhood

My name is Nick Truckey, and I own property in the Timberline neighborhood, with the long-term goal of creating a special place for my family, a place we can enjoy for generations. I'm not a developer, and I don't plan to sell or flip anything. In fact, if future regulations make short-term rentals too restrictive, I'll likely just build our family cabin and leave the rest of the land untouched.

To help make the vision financially feasible, I formed a small family LLC and plan to rent out our cabin when we're not using it. I'm a full-time firefighter for a small community in Pierce County and simply want to create something lasting for my family. My great-grandfather was one of the founders of White Pass Ski Area, and my connection to this region runs deep. I want to continue that legacy in a way that's responsible, low-impact, and community-minded.

I've been closely following both the STR permit process and the proposed zoning changes under the Packwood Subarea Plan. While I fully support the County's goal of ensuring safe, well-managed rentals and protecting housing stock, I'm concerned that families like mine, who are investing their own time, labor, and savings to build something personal, may be negatively impacted by policies not designed with us in mind.

Concerns Around STR Taxation and Unintended Policy Impacts

1. Disproportionate Tax Increases on STR Properties

Recent assessment practices have created a significant financial strain for small-scale STR owners. Some properties have seen assessed values increase by up to 277% since 2020, driven by STR-specific sales ratios. These assessments are applied retroactively based on past use, even if the property discontinues STR activity before the new tax year.

This disproportionately affects families who rent occasionally to offset expenses, not run businesses. Meanwhile, commercial storefronts have reportedly not been reassessed.

- This may violate constitutional fairness requirements (uniform taxation under Washington law)
- The process lacks transparency, making it harder to appeal or verify how assessments are calculated
- Taxing STRs like commercial operations without applying the same rules across

business types creates inequity

2. Regulatory Goals May Not Match On-the-Ground Reality

While reducing STRs may be intended to open up housing supply, this approach may not work in Packwood:

- Many homes here are legacy properties, rarely used except by extended families
- Most owners live hours away and have no intention of renting long-term
- Restrictions and inflated taxes may just push families to sell to investors, worsening the housing crisis

3. Spillover Effects on Local Homeowners

As STR assessments surge, levy formulas and tax expectations shift, eventually raising taxes on local homeowners, retirees, and long-time residents—even those not operating STRs.

Recommendations

- Pause or reassess STR-targeted tax practices and permitting rules until more community input can be gathered
- Ensure STR assessments meet uniformity and fairness standards under state law
- Engage small, family-run STR owners in policy development

Additional Considerations Before Finalizing STR Code

1. Pre-Development Intent – STR Permit Reservations

Why it matters: Permits may be capped before construction is complete.

Recommendation: Create a way to reserve permits for parcels with active plats or building plans.

2. Non-Housing Parcels – Seasonal/Low-Impact STR Classification

Why it matters: Some cabins could never be long-term housing due to layout or location.

Recommendation: Create a flexible STR classification for remote, family-first rentals that don't remove housing supply.

3. Ownership Transfers – Retain Permits for LLCs/Trusts

Why it matters: Many families use trusts or LLCs for planning or liability reasons.

Recommendation: Allow permits to transfer when ownership structure changes but control and use remain the same.

4. Local Ownership and Public Stewardship

Why it matters: Many STRs are run by Washington residents and local public workers, not outside corporations.

Recommendation: Prioritize owner-occupied or family-run STRs in permit distribution or renewal, where possible.

5. Context-Based Compliance

Why it matters: Rules like parking signs or sound restrictions don't make sense on secluded lots.

Recommendation: Allow enforcement flexibility for rural, non-impact properties.

6. Dual-Use Cabins – Family Priority Rentals

Why it matters: Family use is the primary purpose for many owners.

Recommendation: Offer simplified renewals for STRs that are mostly used by the owner and their family.

7. Dormancy Grace Period

Why it matters: Owners might skip rental in some years due to life events.

Recommendation: Don't revoke permits after 6 months of non-use; allow a 2–3 year gap without penalty.

Construction-Phase Permit Proposal

Proposed Addition to LCC 17.105.050 – Permit Issuance:

(7) Conditional Permit Eligibility for Properties Under Construction

A short-term rental permit may be conditionally approved for a property that is under active construction if all of the following conditions are met:

- (a) The applicant has obtained a valid building permit for a dwelling unit on the parcel
- (b) The applicant submits a written declaration of intent to operate the completed dwelling as a short-term rental
- (c) The applicant submits all required STR permit documentation except for items dependent on final occupancy (such as floor plan, insurance, inspection sign-offs)
- (d) The permit shall remain inactive and non-transferable until a certificate of occupancy has been issued and all standards in LCC 17.105.040 and 17.105.050 have been met

Permits issued under this subsection shall be considered vested for the purposes of STR caps and location-based limitations, provided the application is submitted prior to December 31, 2025. The permit must be activated within 18 months of issuance or it will expire unless an extension is granted by the Department of Community Development.

Permit Transfer Flexibility for Planning-Based Ownership Changes

Proposed Addition to LCC 17.105.050 – Permit Issuance:

(6) Administrative Transfers of Permit Ownership

A short-term rental permit may be administratively transferred to a new legal owner without requiring a new application if all of the following conditions are met:

- (a) The new legal owner is a business entity, trust, or immediate family member of the original permit holder, and the purpose of the ownership change is related to estate planning, insurance, or liability management
- (b) The use, operation, and responsible party for the short-term rental remain materially the same
- (c) The short-term rental remains in good standing and continues to meet all standards in LCC 17.105.040 and 17.105.050
- (d) The new owner submits updated contact, insurance, and documentation information to the Department of Community Development within 30 days of the ownership change

If the above criteria are not met, or if there is a significant change in the use or responsible

operator, the permit shall not transfer and a new permit application will be required.

STR Permit and Assessor Coordination

From what I understand, Lewis County currently uses STR tracking software to identify activity and shares that with the Assessor's Office. I have a few questions and concerns:

- Will STR permits issued under this new system be automatically reported to the Assessor's Office?
- If a property has a permit but is not rented in a given year, could that still result in a reassessment or commercial classification?
- Could a "non-use" declaration be added to annual renewals to prevent reclassification during inactive years?

Many small-scale owners simply want the option to rent occasionally, without being penalized in years when they do not.

Closing Remarks

I believe this issue goes far beyond just code language. It impacts the future of Packwood, its accessibility, affordability, and the ability of families to stay connected to a place they love. I appreciate the County's work and am happy to be part of the conversation in any way that helps shape a thoughtful, fair, and sustainable STR policy.

Thank you,
Nick Truckey
253-985-0593
Property Owner – Timberline Neighborhood

From: [Jordan Mitchell](#)
To: [BOCC](#)
Cc: [Mindy Brooks](#)
Subject: Short-Term Rental
Date: Friday, June 20, 2025 10:05:35 AM

You don't often get email from jordan.mitchell@airbnb.com. [Learn why this is important](#)

Dear Commissioners,

I hope this message finds you well. I am writing to request a meeting with you to discuss the upcoming short-term rental ordinance currently under consideration in Lewis County

We appreciate the County's efforts to thoughtfully consider regulations that balance community needs while supporting residents who rely on short-term rentals as an economic opportunity.

Airbnb is committed to working collaboratively with local governments, and we would welcome the opportunity to meet with you to learn more about the ordinance under consideration and to share how we can be a constructive partner in developing a fair and effective regulatory framework.

Please let us know a convenient time to connect. We are happy to participate in person or virtually, depending on your availability.

Thank you for your time and consideration.

Jordan

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From: [Tressa Mattioli Lewis](#)
To: [Mindy Brooks](#)
Subject: Subject: Concerns Regarding Proposed Short-Term Rental Regulations
Date: Sunday, June 22, 2025 9:50:56 AM

You don't often get email from tressa.mattioli@gmail.com. [Learn why this is important](#)

Hello Mindy,

I was hoping to provide the below information to the county planning committee. Please let me know if this is not the best avenue:

My husband and I are proud owners of a small cabin in Ashford, a place that is truly our favorite in the world. We travel there regularly, not just to enjoy the incredible natural beauty of Mount Rainier, but because this area holds deep personal meaning for us. We have worked hard to create a welcoming and thoughtful short-term rental that allows others to experience the region in the same way.

After listening closely to the recent Planning Commission meeting and reviewing the proposed short-term rental regulations, we are writing to respectfully express serious concern about two specific requirements:

1. The requirement for a current building permit as a condition for short-term rental approval.
2. The requirement for a modern septic permit for short-term rental approval.

These provisions, if adopted as written, would have broad unintended consequences for small legacy cabins and for many long-standing properties across Lewis County. As you know, many of these cabins were built decades ago, well before modern building and septic codes were in place. In most cases, official permit records from that era are incomplete or simply do not exist. Requiring retroactive proof of permits or forcing updates to current code would be costly, difficult, and sometimes impossible without extensive renovations.

This is not how other counties in Washington handle similar situations. I have reviewed the policies of all 39 counties in the state, and these proposed regulations would be among the most restrictive in Washington. Nearby counties including Pierce, Thurston, Skamania, Mason, Kitsap, Kittitas, Yakima, and Pacific do not impose such retroactive building or septic permit requirements on older properties. Instead, they allow reasonable alternatives such as self-certified floor plans, basic safety inspections, or proof of regular septic pumping and maintenance.

Requiring full modern building and septic permits would severely limit who can operate a short-term rental in the county. It would favor newer, larger homes that can more easily meet modern code requirements. This shift risks reducing the availability of the older, unique, and charming cabins that visitors specifically seek out for their character and authenticity, cabins that reflect the history and spirit of the area, while unintentionally encouraging larger capacity homes that may bring the very impacts of noise and overcrowding these rules are intended to avoid.

We support thoughtful short-term rental regulation that ensures safety, appropriate occupancy limits, and benefits the county. But these two specific requirements would unintentionally

penalize small older homes and their owners, who are not the cause of the problems these regulations aim to solve.

We respectfully urge the county to consider alternatives proven successful in other Washington counties:

- Accepting floor plans in place of requiring new building permits.
- Allowing septic inspections and records of pumping every 3 to 5 years as sufficient proof of proper system function, rather than requiring full modern septic permits.

Thank you for your time and thoughtful consideration of these concerns. We are committed to being responsible property owners and contributing positively to this community, and we hope the final regulations will reflect fairness, balance, and practicality.

Sincerely,

Tressa Mattioli Lewis

206-556-0107

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From: [hayley gamble](#)
To: [Mindy Brooks](#)
Subject: Written testimony on STR updates
Date: Monday, June 23, 2025 7:03:40 PM

Hello, please provide this testimony to the planning commissioners:

1. Cap. Consider a 30% cap as a starting point. This could be adjusted in the future if needed and allows for all current and imminently planned STRs to proceed.
2. Local property representative. Please consider allowing representatives within 100 miles or 2hrs. Requiring a local representative in Lewis county will require the use of a STR company, who take 30%+ commission. This will shut down many STRs. Again, I suggest you start broad and adjust later if it does not work out.
3. Permit fee. Many of us don't rent out all year round. Consider different rates for different amount of time, or just keep the permit cost low. Please don't use the fee as a barrier to entry, you will just end up with empty properties.

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Dear Planning Commission,

I am writing in opposition to the proposed short-term rental restrictions in Packwood as currently drafted. I urge the Planning Commission to reconsider this proposal for the following reasons:

1. Longstanding Ownership and Intent – My family has owned our property in Packwood for over 40 years. We are currently building a vacation home that will serve primarily as our family retreat, with the intent to rent it when we are not using it. Restricting our ability to rent a property we've long held—especially before the home is even complete—feels punitive and unfair. We undertook this project in good faith, relying on the rules in place at the time.

2. Historical Use and Neighborhood Character – High Valley was developed in the 1960s as a vacation home community and has always included part-time residences, many of which have been seasonally rented. Short-term rentals are not a new or incompatible use—they are part of the established character of the area. While I do believe there are some problems that come with this, I have also seen what many of these homes looked like when they were dilapidated and vacant coming out of the recession.

3. Fair, Forward-Looking Solutions – I support balanced solutions and believe the County could explore limiting new STR permits tied to future property sales, rather than restricting longtime owners mid-stream. This approach would respect long-term investment decisions while still addressing community concerns. Additionally, efforts to promote affordable housing would be better focused on downtown Packwood, where future zoning, infrastructure, and services can more realistically support long-term housing growth potential.

4. Equitable Permit Distribution – To prevent the consolidation of STR permits by a small number of individuals or corporate entities, I encourage the County to consider capping the number of permits allowed per owner. Limiting ownership per person or entity would support community diversity and prevent large-scale commercialization of neighborhoods originally designed for vacation and family use.

5. Economic Impact– The proposed restrictions would significantly reduce local tourism revenue and impact job opportunities. It's undeniable that STRs generate substantial tax income and help sustain small businesses, such as restaurants, shops, and service providers. Curtailing STRs could weaken this economic foundation, especially during off-peak seasons when tourism-driven spending is most important.

6. Housing Affordability Misalignment– Blaming STRs as the primary cause of housing unaffordability in Packwood is not supported by available data. Lack of new construction and infrastructure limitations are the more significant factors. Restricting STRs will not result in increased affordable housing and risks ignoring broader systemic issues.

Although not part of the formal review criteria, I also want to highlight the positive role that well-managed STRs play in our community. They bring in families, hikers, and skiers who support local businesses and build long-term appreciation for the area.

Families like mine are not investors, we are stewards of this land. We've maintained our property for decades, and the home we're building now is for our children and grandchildren to enjoy. The ability to responsibly rent it part-time helps us sustain that legacy.

Thank you for considering my perspective and for your service to the community.

Sincerely,

Kyle Fox
124 Maple Place
Packwood, WA

From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Ashford STR regulations
Date: Tuesday, June 24, 2025 2:06:02 PM

Kate Chatterton

Administrative Assistant Sr
Lewis County Board of County Commissioners
360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: Tom Mattioli <tom.mattioli@yahoo.com>
Sent: Tuesday, June 24, 2025 1:23 PM
To: BOCC <BOCC@lewiscountywa.gov>
Subject: Ashford STR regulations

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County Board Members

I am a retired public servant who is trying to augment my retirement with a short term rental in Ashford.

I have invested my savings and made huge improvements to the home and neighborhood. My assessment went 130, 000 just this year.

I believe my str not only helps me and my family but the cleaning team, lawn care, and local handymen . Our guest shop at the market and use the local restaurants.

Using str regulations from other communities for guidance is like comparing Apple's to oranges.

As you know the National Park is in our backyard and we provide a service to the hundreds of thousands that visit.

Please do not adopt the strict limitations on the number of str in Ashford's in neighborhoods.

We provide jobs, support business, improve the condition of the area and allow for nature lovers to use the National Park.

Thank you
Tom Mattioli
117 Tahoma way
Ashford wa.

[Yahoo Mail: Search, Organize, Conquer](#)

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From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Stop STR in Ashford
Date: Wednesday, June 25, 2025 8:19:34 AM

Kate Chatterton

Administrative Assistant Sr
Lewis County Board of County Commissioners
360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: Danielle alcorn <daniellealcorn84@gmail.com>
Sent: Wednesday, June 25, 2025 8:07 AM
To: BOCC <BOCC@lewiscountywa.gov>
Subject: Stop STR in Ashford

You don't often get email from daniellealcorn84@gmail.com. [Learn why this is important](#)

Dear Commissioners Commitee,

Short term rentals are ruining this small town. I raise my family in Ashford . My children go to school here as well as me working locally. Short term rental owners do not pay the same taxes as the the lodging businesses up here when they have the same amount of cabins/rooms if not more. They should be paying for a transient accommodation, especially Betsy cabins and Nick Nivelles Mt Rainier cabins. They are taking family homes and sticking 3 mini homes on one lot. Neighborhoods that had children running around now are being over run with Airbnbs who do not respect our roads or locals. I'm in full support of someone finally stepping in and keeping this town beautiful and not overrun with Str and Airbnbs. STOP SHORT TERM RENTALS!

Sincerely,
Danielle Burlew

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From: [Chris Boustead](#)
To: [Mindy Brooks](#)
Subject: Written testimony regarding LCC 17.105 proposed STR regulations
Date: Wednesday, June 25, 2025 2:21:06 PM

You don't often get email from cbous1@gmail.com. [Learn why this is important](#)

To the Planning Commission,

Although I am not a short-term rental (STR) owner myself—my property in Packwood is the only one I own—I’ve had the opportunity to meet and get to know many STR owners in our community. These are not anonymous investors or corporate landlords. They are individuals and families who love this place, actively contribute to the community, and often use their homes themselves. Many volunteer, pick up litter, support local businesses, and help neighbors. They help find lost pets and go out of their way to assist others in town. They are not running STRs to get rich—frankly, most are barely turning a profit given the increases in property tax and drop in bookings.

The proposed regulations appear to be borrowed from much larger municipalities—like Bend, Oregon (pop. ~105,000), and Hood River (pop. ~23,000)—without consideration for Packwood’s vastly smaller population (~300) or its unique economic conditions. There is no meaningful comparison between these places. What works in cities 76 to 300 times our size is likely totally inapplicable here.

Importantly, **no local economic or housing impact study** has been conducted to assess how these STR regulations would affect Packwood. STRs play a vital role in our local economy, especially during shoulder seasons and off-peak months when other tourism drops. Many STR owners spend time in Packwood themselves, meaning they contribute both as visitors and as part-time residents, keeping the lights on for local businesses.

Enacting these regulations without first understanding the consequences could do significant harm. Based on conversations with business owners and residents, I believe implementing LCC 17.105 as written would severely damage Packwood’s fragile economy.

STR regulation may be appropriate at some point—but not without proper data and public input. A more thoughtful, community-driven process is needed, as the current proposal reportedly involved no local STR owners.

Finally, the proposed implementation timeline is deeply concerning. Many residents—including active STR owners—had never even heard of this proposal until recently. Giving less than six months to adapt to complex, potentially business-ending regulations is unrealistic and unfair. If STR regulations are eventually adopted, they should include:

- A **gradual implementation timeline**, and
- **Grandfathering provisions** to protect current STR owners who have invested in good faith and contribute positively to our town.

Please take the time to study this issue locally, listen to those who live here, and craft regulations that reflect the real needs and scale of Packwood—not those of cities hundreds of times larger.

Thank you for your time and consideration.

Chris Boustead
106 Cottonwood Ln, Packwood

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June 24, 2025

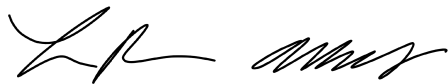
Dear Planning Commission,

As Lewis County landowners in Packwood, we are opposed to the new restrictions of 17.105.

- 17.105.030 (1) STR cap of 25% is unfortunately an arbitrary number that is not data driven by successful outcomes in other communities. The cap makes assumptions regarding the actual number of STR properties in particular areas based on one data report. Unfortunately, this creates the potential for underreported numbers. We understand housing for the local population is very important. Data from other communities shows that this cap, although providing more residences, will not greatly reduce home values to affordable levels. If this must become regulation, we suggest using actual permit application numbers to guide the actual cap percentage so no one is left out. EG: 28% of homes request a permit, make 30% the cap.
- 17.105.040 (3) There should be a maximum occupancy provision to exceed bedroom numbers if the septic system and home allows. Our home under construction has 2 bedrooms and a bunk room (loft), but we have installed a 4 bedroom septic for resiliency. There is no reason the home could not safely handle more than 7 guests.
- 17.105.050(1)a gives a grace period that ends December 31st, 2025. After well over 3 years of land ownership, we have acquired building permits and have executed financial and construction contracts. This has been a lifetime dream for our family with hopes to utilize living in our home as much as possible while offering the property as a STR to help offset the costs of building. We personally know two other families in the exact same position. Our ask is that the grace period extends to December 31st, 2026. This will allow citizens like us who have made a major financial commitment the opportunity to exercise the options we intended with the property we purchased. In addition, this extended grace period will give time for existing owners to adjust to and comply with the new regulations. An alternative option would be to allow permit acquisition based upon approved Lewis County building permits.

Matters like these are no easy task and we applaud the Planning Commission's efforts. Please do not let us and other families "miss the boat" and suffer undue financial burden.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lucas and Amanda Bowers', written in a cursive style.

Lucas and Amanda Bowers

From: [Karsten Caviezel](#)
To: [Mindy Brooks](#)
Subject: Packwood Wa STR proposed regulations
Date: Wednesday, June 25, 2025 2:53:22 PM

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Mindy Brooks,

I attended your town hall meeting via zoom and applaud you for keeping everything together—It was a lot of news and proposed changes for everyone to take in. My family purchased a cabin in lower Timberline back in 2014 and we've spent the past 11 years utilizing it for both summer and winter activities. We've also utilized our cabin as an STR, and we're worried that the new zoning rules and permit caps could take away our ability to do so. I would like to express my deepest concern that adding these area caps and regulations might take away the financial support we receive from our cabin which allows us to use it. The additional income also helps pay for all the up keep and yearly maintenance. We suffered a major blow this past year with a 47% increase in our assessed value which hasn't even begun to make sense to us, but we're obviously obligated to pay it. My neighbors' home is a 2007 new construction with ductless ac/heating, granite counter tops will fully landscaped back yard and it has a valuation at 387,000—Our 1970s non-updated chalet has been assessed at 710,000. Wouldn't comps compare the square footage of homes selling and use those comps towards both our homes? It seems unfair that were given the higher 47% increase and my neighbor who doesn't str gets a 3% increase...

Well, besides all that— I'd like to propose or make a suggestion that current STR's are grandfathered into the permit system if its established. Current Packwood STR's have been through the start up time, covid , post covid and all the transformations of the market. We've made financial decisions regarding our cabins knowing or having the ability to use the STR platform. I fear that a first come first serve, or lottery system could exclude us from getting a permit down the road.

How can we sign up for current news or happenings with str regulations in packwood? How can we be the first to know of any changes?

--Limiting STR's won't help most of these areas with affordable housing as cabin owners will simply use their cabin for friends and family only. Lewis county needs to come to the realization that people working in Packwood may need apartment type living in Randall or Morton. Most people who work in Seattle or Bellevue (outside of tech live) in Bothell or Renton— Packwood isn't an exception.

Our STR contributes the following positives to the community:

- \$25,000 cash to local cleaner
- \$2,500 cash to local handy man
- \$1,500 local building materials and or supplies
- \$6000 lodging taxes

-\$7000 property taxes

-Several guests visiting the highway 12 corridor dumping money at local stores, restaurants and attractions along the way

The Timberline and Packwood areas are near limits for airbnbs according to your chart, and I don't want to get left out if the permit process comes into effect. I feel that current long term cabin owners should be grandfathered into the system as we've paid more than our fair share into the tax system and contributed to the growth of the community. I can remember back in 2011-13 when homes would be on the market for 2 years before selling, and most of the produce at our local IGA was on its last leg.....

Last question, if a business entity owns a STR on highway 12 or behind Ace on commercial property, would those areas be included in the Packwood 25% cap, or would they just get accepted as the properties were listed as commercial properties? Are they excluded from any type of cap? Thanks, and I'd like some clarity on that---

Karsten Caviezel

Senior Financial Advisor

3312 Rosedale St, Suite 201 • Gig Harbor, WA 98335

Phone (253) 201-6504 • Fax (253) 313-5828

karsten.caviezel@lighthousegh.com



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From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Email from Commissioners Contact Form
Date: Wednesday, June 25, 2025 8:01:56 AM

Kate Chatterton

Administrative Assistant Sr

Lewis County Board of County Commissioners

360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: contact@lewiscountywa.gov <contact@lewiscountywa.gov>
Sent: Tuesday, June 24, 2025 6:05 PM
To: Tammy Martin <Tammy.Martin@lewiscountywa.gov>; Rieva Lester <Rieva.Lester@lewiscountywa.gov>; BOCC <BOCC@lewiscountywa.gov>
Subject: Email from Commissioners Contact Form

Name: Chad Jensen

Email: chad.jensen@me.com

Message: I am writing in support of your efforts to regulate Short Term Rentals so homeowners and owners associations can be supported. Someone bought a house in our community with the intent of creating a short term rental. Their was hidden from the community until they opened their rental. This resulted in years of fighting only for our small community agreeing to allow the short term rental as they threatened to sue our association if the owners chose to try to stop them. Unfortunately our associations legal counsel advised the board that it was a fight we could not win. Now we deal with a rental in our midst in perpetuity. We have short renters going down wrong driveways trying to find the place, excessive noise, occasional issues with renters not following burn bans, trash cans left at the street and difficulty with Insurance because we have a short term rental in our midst. I strongly support operational standards, caps on number and especially not being able to transfer the right to have a short term rental with the sale of a home. I fear professional rental companies will buy up these rentals and ignore the needs of the community. Let me know if there is any way I can help. Sincerely, Chad Jensen LB Ranch Mineral, WA

User Agent: Mozilla/5.0 (Macintosh; Intel Mac OS X 10_15_7) AppleWebKit/605.1.15 (KHTML, like Gecko) Version/18.5 Safari/605.1.15

IP Address: 192.168.247.7

From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Email from Commissioners Contact Form
Date: Wednesday, June 25, 2025 8:19:22 AM

Kate Chatterton

Administrative Assistant Sr

Lewis County Board of County Commissioners

360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: contact@lewiscountywa.gov <contact@lewiscountywa.gov>
Sent: Wednesday, June 25, 2025 8:06 AM
To: Tammy Martin <Tammy.Martin@lewiscountywa.gov>; Rieva Lester <Rieva.Lester@lewiscountywa.gov>; BOCC <BOCC@lewiscountywa.gov>
Subject: Email from Commissioners Contact Form

Name: Veronica Szymczak

Email: vszym@hotmail.com

Message: We have a small HOA, LB Ranch, in Mineral. We have had several issues with the one VRBO in our gated community. When the owners said they were turning their home into a VRBO we fought them. We were unable to stop them but managed to ensure no other short term rentals would be allowed in our community with the help of an Attorney. Unfortunately, because WA considers VRBOs as residential rather than commercial we had to allow them to continue or face potential ruin from attorney fees. We have had several issues with their guests to include but not limited to speeding, trespassing, garbage, uncontrolled animals, giving out our gate code to all guests, and illegal fires. The owners told us they would make sure we didn't have these issues during our litigation. Once they were grandfathered in they basically said they could do whatever they wanted and there was nothing we could do to stop them. The other issue we have is now that we have had litigation regarding the STR we have to pay higher prices for our HOAs insurance. If for some reason we loose our current insurance policy we won't be unable to get another policy because of the litigation. You can't operate an HOA without insurance. These STRs are community killers and we support any and all restrictions you can put on them. The biggest thing you could do is change all STRs from residential to commercial enterprises. This would give most HOAs the authority to prohibit them if the greater majority voted it in. Regards, Veronica Szymczak LB Ranch HOA President

User Agent: Mozilla/5.0 (iPad; CPU OS 18_5 like Mac OS X) AppleWebKit/605.1.15 (KHTML, like Gecko) Mobile/22F76

[FBAN/FBIOS;FBAV/517.0.0.42.97;FBBV/746450682;FBDV/iPad13,18;FBMD/iPad;FBSN/iPa

dOS;FBSV/18.5;FBSS/2;FBID/tablet;FBLC/en_US;FBOP/5;FBRV/0]

IP Address: 192.168.247.7

Written Testimony regarding Short term rentals

Attn: Mindy Brooks

Regarding 113 Maple Place Packwood, WA
parcel # 009800582000

I am a single retired 63 yr old woman. I made the investment in my place to provide an affordable short term rental.

My intention was to have a retreat for myself, renting it out as well to supplement my income and assist with the cost of maintenance.

I employ locals from a period of relinquishing it to a management company for two years, to employing locals to manage, clean, maintenance, yard work, etc.

I have neighbors on both sides of me that are not short term rentals but are vacation homes.

I have never had a complaint concerning my tenants but I actually HAVE had four complaints from my

tenants complaining about THEM!

Short term rental tenants are very gentle on wear & tear on my property as well as electric & water usage.

I draw many single travelers that simply do not even cook here but rather patronize local eateries.

I have personal experience owning a full time rental in Eng Harbor, Washington.

I have had it completely trashed TWICE. Landlords do NOT have many rights & protection in Washington State.

During COVID we were not allowed to enforce rent, ~~TOP~~ It was financially devastating for me, again with NO landlord support from Washington State!

I felt ~~secure~~^{secure} in having a short term rental since I did not have to worry about these issues. I have had huge water bill issues with my full time rental as well as delinquent power bills

that I am left responsible for
as the property owner.

Short term renters are always
mindful of my property.

This year Washington State has
visciously gone after short term
rentals. My property tax more than
doubled, my HOA more than doubled
followed by this current threat of
losing my right to rent my property
out.

My full time renters in Gig Harbor
also caused damage to my septic
flushing things that fully clogged it,
leading to costly repairs, & replacement.

I would never under ANY
circumstances turn ~~the~~ my packwood
home into a full time rental.

Also it is HIGHLY unfair to
categorize a park model with
an RV. My park model has a
full porch built on & has a fully
fenced yard.

I ask that park models be
in a separate category, no different
than a modular home. There are
no wheels on my home. It is. Skirt

It would cost severe financial hardship on me just as the exhorbinant property tax hike has.

I did an appeal on the property tax. It was rejected under short term rental categorizing on it's own criteria.

I deserve to maintain my short term rental as an important part of my personal retirement plan.

Sincerely,
Shannon Thompson

Order of the LEWIS
County Board of Equalization

Property owner: **Shannon Thompson**

Parcel number(s): **009800582000**

Assessment year: **2024**

Date(s) of hearing: **5/1/2025**

Petition number: **24-085**

Having considered the evidence presented by the parties in this appeal, the Board hereby:

☒ sustains ☐ overrules the determination of the assessor.

Assessor's true and fair value

☒ Land	\$ 82,100.00
☒ Improvements	\$ 177,100.00
☐ Minerals	\$
☐ Personal property	\$
Total value	\$ 259200

BOE true and fair value determination

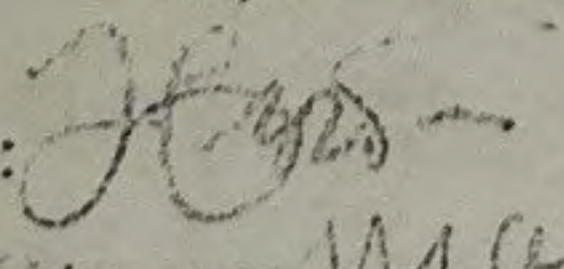
☒ Land	\$ 82,100.00
☒ Improvements	\$ 177,100.00
☐ Minerals	\$
☐ Personal property	\$
Total value	\$ 259200

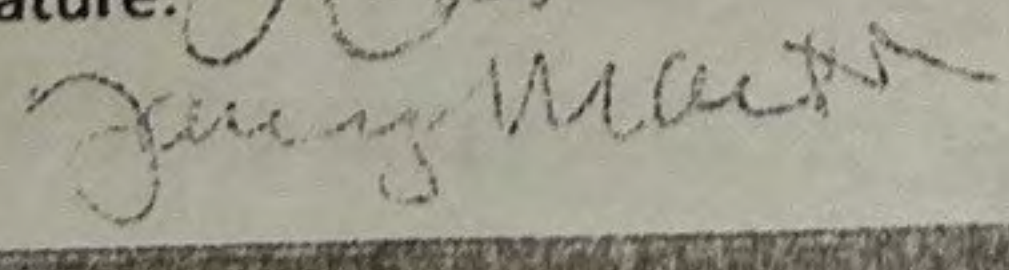
This decision is based on our finding that: *(if more space is needed use pages 2 & 3)*

The appellant disagreed with the assessed value based on the Federal Reserve Bank of St. Louis' assessed values. and after reviewing Packwood properties, felt that STRs and VRBOs were being unfairly assessed. The appellant provided a comparable sale sold in 2022 and another sold in 2024.

There was considerable discussion about the economic impact. This is park model mobile. The Board did not consider the comparables because there were no adjustments made for time. Comparable sales used in assessing the parcel were from 2023. There was no other documentary evidence provided by the appellant.

Dated this 20 day of June, (year) 2025

Chairperson's signature: 

Clerk's signature: 

SHIPPED JUN 20 2025

NOTICE

This order can be appealed to the State Board of Tax Appeals by filing a formal or informal appeal with them at PO Box 40915, Olympia, WA 98504-0915 or at their website at bit.ly/wa-govt/index.php/forms-publications/ within thirty days of the date of mailing of this order. The appeal forms are available from either your county assessor or the State Board of Tax Appeals.

To ask about the availability of this publication in an alternate format for the visually impaired, please call 360-705-6705. Teletype (TTY) users may use the WA Relay Service by calling 711.

Envy Tacoma
hardship documentation
Jun 19, 2025 at 12:03:23 PM
~~John Doe~~

I am Shannon Thompson, an investment property owner in Packwood, WA.

I am writing this letter with a strong referral to the exorbitant rise in property taxes targeted at short term rental property owners as well as new owners of former short term rentals that are also being targeted and assessed exorbitantly high with recent huge increases in property value relating to doubling and tripling of property taxes.

My reason for buying investment properties relates back to the 2008 crash when I nearly lost everything.

I had a retirement account at that time valued at \$50,000. I was self employed, and had begun investing in earnest into my retirement account as a self employed, single mother of 3 at 30 years old. In 2008 the value dropped to \$15,000. I had two retail locations which quickly fell into jeopardy as well. I was forced to liquidate my meager retirement, invest it into one of my businesses and close the other. I had to pay a penalty and was also taxed on this liquidated retirement.

The money was invested back into my last retail business. Moving forward and steadily into 2025 and my 60's I never again had any trust in a retirement account. I chose therefore, to invest in real property.

I bought Packwood 8 years ago as an investment for my retirement.

By creating a short term rental I have employed many locals for various services such as cleaning, maintenance, yard work and some contractors when needed as well as later a management company with a large staff.

I have chosen upto this time to reinvest whatever was left into improvements on the property,

I will inject here that short term rentals are usually maintained in a much higher standard than full time shabby rentals.

Now for this current time. I faced a serious cancer health scare and determined that it was time to manage stress and live a much simpler quieter lifestyle.

I sold my business Feb 2025 with intent of my short term rental providing income to me during my retirement as a single 63, soon to be 64 year old single woman with no other retirement income.

I terminated the management company and hired new cleaning staff to assist so that I did not have to pay out the 40% management fee going further, I had done so before to ease my own responsibilities and let it be self-sufficient for that time frame.

Very shortly after my early retirement based solely on health concerns and simplifying my life I learned of the exorbitant tax increase which cut even further into any profit and income from my investment.

I applied for disputed tax relief and as of this date have not had a response. My friend Kim Nordi helped me with the meeting

as I felt terribly unqualified to attend myself.

I muse that there may be many more individuals like myself who are too intimidated to speak out in fear of ignorance of the system.

I may be faced with selling my property in Packwood simply because of acute financial unexpected hardship. It is frustrating and actually very depressing.

I have never made much revenue from Packwood. I had a lot of overhead and many many many improvements made from the time that I purchased it as a neglected abandoned property.

I hope that with group action that we can make a difference in this horribly unfair tax targeting towards short term rentals. I must wonder if long term rentals would not be next??

Sincerely,

Shannon Thompson



June 26, 2026

Lewis County Planning Commission

c/o Mindy Brooks

351 NW North Street,

Chehalis, WA 98532

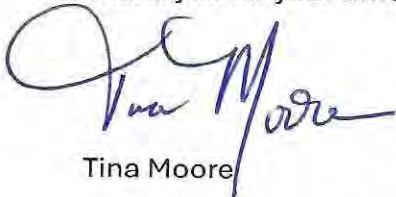
To whom it may concern:

I attended the meeting in Packwood on June 23, 2025. I am a small lavender business in Mineral, WA with 3 airbnbs on my property. I strongly feel that my airbnbs are not going to solve the problem of affordable housing for Packwood. Packwood has gotten out of control with STR. Not small towns like Mineral. We do not have businesses that require housing for workers. We should not be lumped into the issues that are happening in the much larger towns.

My airbnbs are a Dome, a Cottage and a Bungalow. Neither have cooking facilities in them or a bathroom. The bathroom is a separate building. So these dwellings are not designed for long term stays, therefore do not pertain to an affordable housing issue.

Please reconsider the kind of STR that will fall into the affordable housing issue and not penalize those of us that offer an experience with an overnight stay. The development regulations should pertain to me or Mineral.

Thank you for your time.



Tina Moore

Owner, Lavender Passion Flower Farm

Mineral, Washington

253-569-4689

From: [steven pifer](#)
To: [Mindy Brooks](#)
Subject: Opposition to Proposed STR Restrictions in Packwood
Date: Thursday, June 26, 2025 8:59:42 AM

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Dear Lewis County Planning Commission,

I'm writing as a long-time property owner and active participant in the Packwood community to express strong opposition to the proposed Short Term Rental (STR) restrictions currently under consideration.

My family has operated our modest duplex in Packwood as a STR for over 12 years. With just one bedroom and one bathroom per unit, both sides must remain available as STRs in order for us to afford and maintain our vacation home. STRs like ours are not just a personal benefit — they are a vital part of Packwood's tourism economy and housing landscape.

Please consider the following reasons to reject these proposed restrictions:

- **STRs Are Essential to Local Tourism:** Packwood is a tourism-based economy. STRs allow the town to flex with seasonal demand in a way that hotels with a fixed number of rooms cannot.
- **Unintended Financial Consequences:**
 - Limiting STRs or guest capacity will artificially raise nightly rates, inflate STR property values, and drive up housing prices across Packwood.
 - This makes the community less accessible to both tourists and potential residents.
- **Unjustified / Unequal Requirements:**
 - **Garbage Storage:** STRs should not be held to higher standards than Long Term Rentals (LTRs) or homeowners, who are not required to store garbage indoors.
 - **Capacity Limits:** These limits were not requested by the community, and there is no data suggesting they would increase housing availability as found in economic studies by *Harvard Business Review*.
 - **Septic & Well Inspections:** STRs should not be held to higher standards than LTRs which you aim to promote. LTRs should require this also, thus increasing rental costs.
 - **\$1,000,000 Liability Insurance:** This is not a requirement for LTRs and would be an unfair burden on STRs.
- **Local Economic Harm:**
 - TMC Vacations, the largest STR-related employer in Packwood, may face layoffs. This affects housekeepers, repairmen, landscapers, and others.
 - Fewer STRs will result in fewer visitors — which means fewer customers for local shops, restaurants, and services.
 - According to *Harvard Business Review*, increased tourism directly supports local job growth and small business health.
- **Equity and Fairness:**
 - If permit caps are enacted, current STR owners must be given priority. Many of us have invested years and resources into maintaining our homes and serving visitors.

- **Current STR owners are already being strangled by unfair additional taxation by the assessor's office**, placing even greater financial strain on those of us operating responsibly and transparently.

In summary, the proposed STR restrictions would do more harm than good — punishing existing homeowners, reducing tourism, and shrinking local employment opportunities. Packwood's vitality depends on tourism, and STRs are a flexible, effective way to support that.

Thank you for your consideration.

Sincerely,

Steve and Becci Pifer

115 Tatoosh Ave. N

Packwood, WA

swpifer@comcast.net

253-223-5490

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From: [JAMES TAYLOR](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#); [Lori Gard](#); [Betsy Guerreiro](#); [Nickolas Neville](#); [Phil Farcy](#); [Andrea](#)
Subject: Proposed regulations for STRs
Date: Thursday, June 26, 2025 6:39:24 PM

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Dear Commissioners,

We're writing on behalf of the Bavarian Retreat HOA, a group of property owners in Bavarian Retreat. As you continue discussions around short-term rental (STR) regulations, we'd like to offer a perspective rooted in everyday life here.

Bavarian Retreat is a community of 46 properties on the border of Lewis and Pierce Counties, within the Ashford, WA postal district. Of these properties, 17 are currently vacant, and 8 are operated as STRs. Both vacant property owners and non-STR owners could be negatively impacted by the regulations proposed by the County. Located just five miles from the Nisqually entrance to Mount Rainier National Park, our neighborhood appeals to those drawn to the area's natural beauty and recreational opportunities. In our experience, STRs haven't been a problem to solve—they've quietly contributed to the community in meaningful ways. STRs have even helped increase property values, benefiting all owners.

They bring homes to life.

Many of the homes now used as STRs were once vacant or falling into disrepair. Today, they're freshly painted, well-maintained, and cared for year-round. From tidy yards to safely cleared driveways in winter, STR owners invest real effort into keeping their properties a positive presence in the neighborhood.

They bring people together.

It may surprise some to learn that STR owners often go above and beyond renting homes. They've participated in work parties, served on the HOA board, and stepped up when community needs arise. These individuals aren't outsiders—they're valued neighbors.

They support the broader community.

Visitors staying in STRs help sustain the small businesses that make our area special—restaurants, outfitters, markets, and more. That ripple effect benefits everyone, especially in rural communities like ours that rely heavily on seasonal tourism.

We understand the importance of thoughtful policy—especially those related to health and drinkable water. However, our HOA is governed by its own covenants and bylaws, including provisions that empower property owners to decide how many STRs are appropriate for our community. These decisions should remain within the HOA's purview. We believe the County should exempt HOAs like ours from one-size-fits-all STR regulations.

As these policies are shaped, we respectfully ask that you recognize that responsibly managed STRs are a vital part of what's working in Bavarian Retreat. They help preserve our homes, strengthen our sense of community, and support the local economy.

Please include STR owners and operators in the conversation moving forward. The goal should be balance: protecting neighborhoods while also honoring the people who have invested time, money, and energy into making them better.

Sincerely,

Jim Taylor, President of Bavarian Retreat Homeowners Association

On behalf of the Bavarian Retreat HOA

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From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Study Data-Driven Opposition to Proposed STR Regulations
Date: Thursday, June 26, 2025 6:48:51 PM

Dear Commissioners,

As you consider policy decisions surrounding short-term rentals (STRs), I urge you to review recent economic research that presents a compelling case against overly restrictive regulation.

During the Packwood community meeting on June 23rd, it was shared that no studies were available to determine the impact of regulating STRs. In fact, several studies from communities that have already implemented such regulations provide clear insights. Both Chelan and Leavenworth have had STR restrictions in place for multiple years—yet both communities have continued to experience equivalent or greater increases in property values compared to Packwood. This suggests that regulating STRs does not necessarily lead to improved housing affordability or accessibility.

Moreover, a comprehensive study across 15 major U.S. metropolitan areas from 2008 to 2019 found that a 1% increase in Airbnb listings led to a 0.769% increase in residential building permit applications. This correlation shows that STR growth supports real estate activity, stimulates construction, and contributes to expanding the housing supply and tax base.

In contrast, jurisdictions that enacted STR restrictions experienced significant economic setbacks:

- A total reduction of \$2.8 billion in property values.
- A loss of \$40 million in annual tax revenues.
- A 10.8% decline in new residential building permits within the first year, alongside an 8.9% drop in STR listings.

This demonstrates that STR restrictions not only reduce tourism-related income but also discourage investment in housing—undermining both short-term lodging and long-term development.

Additionally, a report by Oxford Economics concluded that STRs have had a minimal impact on rising home prices and rents. Between 2014 and 2018, STRs contributed to only 1% of a 14.9% housing price increase, with an even smaller effect in seasonal markets like the Coachella Valley. The full report can be reviewed here:

[Oxford Economics STR Impact Report](#)

Rather than promoting affordability, STR regulations may reduce housing starts, depress property values, and diminish tax revenue—without addressing the root causes of housing shortages.

I encourage you to consider these data-driven findings and pursue balanced policies that protect responsible STR operators, sustain tourism, and preserve a healthy real estate market in Lewis County.

Sincerely,

Nickolas Neville

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From: [Myles Pappas](#)
To: [Mindy Brooks](#)
Subject: Proposed STR Regulation.
Date: Friday, June 27, 2025 1:32:24 PM

You don't often get email from kangacheero@gmail.com. [Learn why this is important](#)

Dear Board Members,

I attended the recent meeting in Packwood and listened closely to the proposed regulations for short-term rentals (STRs). While I recognize that many of these ideas may be well-intentioned, I left deeply concerned. These proposals, if enacted, would have unintended consequences that could severely impact livelihoods and the local economy.

We already have building codes and safety regulations in place. Why layer on burdensome new restrictions—especially on an industry that is largely self-regulating through guest reviews, platform accountability, and market forces?

STR owners aren't the problem. In fact, they're part of the solution. Many of us have taken rundown or unused properties and turned them into welcoming, well-maintained homes that uplift surrounding neighborhoods. We employ cleaners, contractors, handymen, landscapers, and support a range of local businesses. STRs directly contribute to job creation and economic revitalization in areas that have long been overlooked.

One particularly frustrating part of the proposed regulation is the garbage requirement. It unfairly singles out STRs to lock up their garbage—something not required of long-term rentals or permanent residents. This places unnecessary cost and burden solely on STR owners. If garbage were truly a recurring problem, STR owners would quickly feel it through bad reviews and lost bookings. The market already holds us accountable. Additional regulation in this area is redundant and unjust.

I also want to share two real-life examples from my own STR properties that highlight the imbalance. On one property, I have a neighbor with over 100 chickens, several geese, a dozen rabbits, multiple dogs, three turkeys, two peacocks, and one massive pig—possibly even a partridge in a pear tree. The odor alone is overwhelming, yet this situation is somehow allowed to persist unregulated. On another property, the neighbor lives in a dilapidated trailer surrounded by broken-down vehicles and junk. Again, no enforcement. If either of these properties were STRs, they wouldn't survive a week without complaints, bad reviews, or intervention. If we can't enforce the regulations we already have, why are we proposing more?

Your own data showed 300% growth in tourism. That's a signal of opportunity—not something to fear. Instead of capping STRs at 25%, why not recognize these zones as high-demand areas and work with us to encourage smart, sustainable growth?

Economically, restricting supply during a tourism boom only drives up prices. STR caps don't lower housing costs—they raise them. Property values are determined by comparable sales. Discouraging investment and limiting use reduces improvements and inflates housing costs, working against the very goal of affordability.

Please reconsider this path. Let's address real concerns—like nuisance properties—with targeted enforcement, not blanket policies that hurt responsible owners and local businesses alike.

**Respectfully,
Myles Pappas**

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From: [Brandon Neville](#)
To: [Mindy Brooks](#)
Subject: Opposition to Proposed STR Regulations in Lewis County
Date: Saturday, June 28, 2025 6:50:33 AM

You don't often get email from brandonneville03@gmail.com. [Learn why this is important](#)

Subject: Opposition to Proposed STR Regulations in Lewis County

Dear Commissioners,

I'm writing today to express deep concern regarding the proposed short-term rental (STR) regulations in Lewis County, particularly as they relate to affordability and economic stability in communities like Packwood.

According to recent wage data, the **average annual income in Packwood is \$59,900**, which translates to a **recommended housing budget of \$1,500/month** using the standard guideline that housing costs should not exceed 30% of gross income. At current interest rates, that budget would support a **home purchase of approximately \$250,000 to \$300,000**.

However, the **median sales price in Packwood is currently \$569,000**—well beyond the reach of average wage earners. This gap raises a critical question:

Is the County prepared to take steps that would effectively force property values down by 50% in an effort to reach affordable housing targets?

Such a scenario would have profound and cascading consequences. Many current homeowners, including retirees, working-class families, and second-home owners, carry mortgage payments significantly higher than \$1,500/month. If regulations prevent these owners from renting their homes to offset costs, they will face serious financial strain. Worse yet, they may be unable to sell their properties at sustainable prices, leading to foreclosures, vacancies, and community destabilization.

Beyond individual hardship, the consequences extend to the broader community. Many HOAs—particularly those with **shared water systems and infrastructure obligations**—rely on dues from all members to function. If a significant portion of owners fall into distress or are forced to walk away from properties due to regulatory pressure, these HOAs may no longer be able to meet their basic operational costs. This poses serious risks to water safety, road maintenance, and other essential services.

The economic ecosystem of Packwood and surrounding communities is deeply interconnected with tourism. Short-term rentals not only provide essential lodging where hotel infrastructure is lacking, but they also help homeowners afford to live, work, and invest in our region.

We urge you to reconsider these proposed regulations. A more balanced approach—one that includes current STR operators in the conversation—can help preserve housing access **without destabilizing the property market, local tax revenue, or community services.**

Thank you for your time and continued service to Lewis County.

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206-779-6297
IRENE.BOTERO@GMAIL.COM

IRENE BOTERO
JOSEPH TAIWO
55 WILLIAMS AVE S UNIT 202
RENTON, WA 98057

JUNE 28, 2025

RE: WRITTEN COMMENTS ON PROPOSED NEW CODE 17.105 LEWIS COUNTY
SHORT TERM RENTALS

I am writing on behalf of myself and my husband Joseph Taiwo, in reference to the new short term rental proposals which will adversely and detrimentally impact the operation of our two cabins – Pine Lodge and The Nest @ Pine Lodge. Both cabins share one lot and are in the upper Timberline neighborhood of Packwood, WA.

We built our larger cabin - Pine Lodge - in 2003 and it has been operating as a short-term rental for about the last 15-20 years or so. Pine Lodge is our family cabin which we personally use about 15-20 times per year. Renting it out when we are not using it enables us to fully maintain and improve it. It also generates income for Packwood locals who manage, clean, and maintain our STR's. Contrary to statements made during a May 27, 2025, planning commission meeting, we are not making money hand over fist by renting Pine Lodge and The Nest out as STR's. Rather, Lewis County has been the greatest beneficiary of income generated by our STR's as the County collects occupancy taxes, locality taxes, personal property tax revenue, and higher property taxes than non-STR properties.

We completed the Nest in November 2023 and have operated it as an STR since December of 2023. We use the first floor of this structure as a garage and storage, and the second top floor as a studio STR rental. Adding a studio to the top of the garage structure added another \$200,000 to the cost of the build. Despite the increased cost, we determined that in about 20 years, we could pay for the added cost of the studio by renting it out as an STR. We put all our retirement savings into building this structure and followed all the County's

existing regulations with respect to the build. We operate both cabins under a sole proprietorship state business license. We use a local management company based in Packwood – Through His Eyes/Angels Touch for our hospitality and cleaning services and hire a myriad of local workers who perform yard, hot tub, septic, pest control, and repair and maintenance services for both our cabins.

The stated purpose of the County's proposed STR rules is to ensure that STR's do not have a significant impact on the residential housing supply in Lewis County, are operated in a manner that protects public health and safety, while also encouraging the economic benefits of tourism.

Section 2 of 17.105.030 – Allowance of short-term rentals, as drafted, prohibits us from renting the Nest as an STR since it shares the same parcel with Pine Lodge. The Nest as built, is not suitable for use as a long-term rental. There is no storage in the Nest beyond an open storage rack for clothes. There are no laundry facilities in the Nest. VisitRainer.com recently added The Nest to its website as a featured premier studio rental in Packwood. Totally eliminating its continued operation as an STR **completely discourages any economic benefit of tourism**, contrary to the stated purpose of the proposed rules. Not only will the implementation of this rule be financially devastating to our family – it will also negatively impact Packwood locals who manage, clean and service this rental property, as well as local businesses frequented by guests of the Nest. It is short-sighted, mean spirited and a complete overreach by the County as to how property owners can legally use their property.

The Planning Commission during its May 27, 2025 meeting stated that non-conforming businesses and residential structures will be allowed to continue to operate within the UGA of downtown Packwood and would not be adversely impacted by new proposed County land use rules; essentially these residences and businesses would be grandfathered in. No such provision is contemplated by the County with respect to the proposed rule prohibiting two STR's on one parcel. At a minimum, the few of us who currently legally operate two STR's on one parcel, in the form of legally permitted structures – a primary residence and an ADU - should be grandfathered in by the County and allowed to continue to operate. Shutting an existing STR down which has been operating legally, without demonstrating a public interest justifying the same, is not a

proper use of eminent domain, which is what this proposed rule in effect will do. It is of dubious questionable legality and will invite legal challenges if implemented.

Section 17.105.040(3) sets arbitrary limits on occupancy of STR's with no consideration as to how a particular cabin has been operating in the past or with respect to room size. For example, Pine Lodge sleeps twelve people – 6 downstairs and six people in twin beds in our loft area. When we use it personally, children usually sleep in the loft area while adults sleep in the downstairs rooms. Pine Lodge is ideal for three families with children. The proposed rule sets arbitrary limits of two individuals per room with no consideration as to the size of the room or how the STR has been safely operating in the past. Small hotel rooms in Packwood normally house 4 people –in two queen beds- why should the County limit STR's to two people per room? Pine Lodge has been operating safely for 20 years with a 12-person capacity. It has regular septic pumping and maintenance service. Rather than set arbitrary occupancy numbers; if the rule-making body is concerned with health and safety of an STR, an annual septic certification would be a more appropriate measure than the setting of an arbitrary occupancy number.

There has been no study demonstrating that the STR's currently operating in Packwood have negatively impacted the availability of the residential housing supply, which is one of the purposes for enacting these rules. In fact, based upon data provided during a June 23, 2025, Packwood community meeting, it appears that in all areas of Packwood, STR's comprise less than 25% of all housing, which was the threshold by which the alleged need for these rules is based. In other words, there is no current need for these proposed regulations. There is no need for annual STR permits, rather, the County should ensure that all STR's, like any other Lewis County businesses, have current valid Washington state business permits.

STR's provide needed tourism revenue and income for Packwood locals and generate income enabling owners to maintain their properties. Creating caps and shutting down STR's, such as the Nest, is not in the best interest of Lewis County and its residents.

Thank you for your consideration.

Irene H. Botero and Joseph A. Taiwo

June 27, 2025

Lewis County Board of County Commissioners
351 NW North Street
Chehalis, WA 98532

As a short-term rental owner in Packwood, I strongly oppose the proposed regulations in Chapter 17.105 due to their excessive restrictions, lack of evidence-based justification, and disregard for community input. Below, I detail specific concerns supported by empirical studies, real-world case studies, and firsthand economic impacts demonstrating why these policies constitute ineffective overreach.

1. Lack of Evidence-Based Decision-Making

The Board of Commissioners has disregarded critical data and meaningful local stakeholder input. Specifically, the Packwood Subarea Planning Community Advisory Committee, on which I served, submitted detailed, community-driven recommendations to the county, yet these were wholly ignored in the proposed regulations. This not only undermines the purpose of public engagement but also results in a waste of county staff resources used to facilitate these meetings, as well as the time and energy invested by community members who participated in good faith.

No Supporting Data: Lewis County's own vacancy rate (4.2%) exceeds the state average, yet the regulations falsely assume STRs cause shortages. A 2023 Urban Studies analysis of 200 rural U.S. counties found "no correlation between STR density and housing shortages" where vacancy rates exceed 3%.

Experimental Approach: The county admits these rules are a "test" (§17.105.030 commentary), yet peer-reviewed research (Journal of Policy Analysis, 2024) shows such experimental caps fail 78% of the time in rural communities without baseline housing data.

2. Economic Harm to Local Residents

The policies threaten Packwood's livelihood by undermining STR-driven employment.

Job Losses: Our single STR employs local workers for housekeeping, hot tub maintenance, snow removal, firewood delivery, and appliance repairs. Similar operations in rural Oregon (per 2024 Cato Institute study) support 3–5 part-time jobs per property.

Business Revenue Loss: Guests consistently seek recommendations for local restaurants and shops, spending \$200+ daily per group. Washington State tourism data (2023) shows STR guests contribute 40% more to local businesses than hotel guests in rural areas.

Disproportionate Impact: Annual permit renewals [§17.105.050(3)] and 24/7 representative mandates [§17.105.040(6)] will force 60% of small operators to close, per a Penn State study of similar rural rules.

3. Arbitrary Caps and Prohibitions

The proposed restrictions lack empirical justification.

25% Cap in UGAs [§17.105.030(1)]: San Juan County, WA, saw a 30% tourism tax revenue decline after a 10% STR cap, while housing shortages persisted due to unrelated infrastructure gaps.

ADU/Multifamily Bans [§17.105.030(2)(3)]: Breckenridge, CO, abandoned identical rules after 40% of ADUs sat vacant without STR income to offset costs.

Commercial Event Ban [§17.105.030(6)]: Sedona, AZ, rescinded this rule in 2021 after 80% of violations were unenforceable.

4. Proven Alternatives

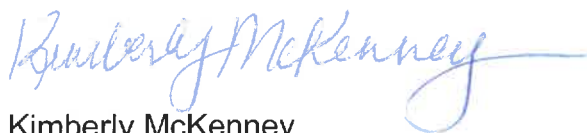
Restrictive caps have failed where targeted solutions succeeded.

Fee-Based Funding: Aspen, CO, uses a 1.5% STR fee (not cap) to generate \$8M annually for affordable housing.

Safety-Centric Models: Bend, OR, requires safety certifications and complaint-based enforcement, reducing issues by 70% without reducing listings.

These untested policies ignore Packwood's economic reality, threaten local jobs, and disregard community input. I urge Lewis County to adopt data-driven solutions like tiered fees or safety certifications instead of arbitrary caps.

Respectfully,



Kimberly McKenney
242 Mountain View Drive
Packwood, WA
kimberlynimbus@gmail.com

Sources Referenced

Economic Impact of STR Caps in Rural Communities

Colorado Association of Ski Towns (2022). "Short-Term Rental Policy Analysis."
<https://www.colorado.gov/pacific/sites/default/files/atoms/files/CAST%20STR%20Report%202022.pdf>

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ADUs and Housing Supply

Chapple, K., et al. (2023). "Accessory Dwelling Units: A Flexible Housing Solution."
University of California, Berkeley.
<https://www.aducalifornia.org/wp-content/uploads/2023/02/ADU-Report-2023.pdf>

STRs and Housing Affordability

Barron, K., Kung, E., & Proserpio, D. (2023). "The Effect of Home-Sharing on House Prices and Rents: Evidence from Airbnb." *Urban Studies*, 60(1).
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STR Regulations and Enforcement Challenges

Penn State University (2023). "Short-Term Rental Regulation in Rural Pennsylvania."
<https://www.rural.palegislature.us/documents/reports/Short-Term-Rentals-2023.pdf>
City of Sedona, AZ. "Short-Term Rental Program Update" (2021).
<https://sedonaaz.gov/your-government/departments/community-development/short-term-rentals>

Economic Benefits of STRs to Local Communities

Washington State Department of Commerce (2023). "Tourism and Short-Term Rentals: Rural Economic Impact."
<https://www.commerce.wa.gov/serving-communities/tourism/>
Cato Institute (2024). "Short-Term Rentals and Local Economies: A National Survey."
<https://www.cato.org/policy-analysis/short-term-rentals-local-economies>

Successful Alternative Approaches

City of Aspen, CO. "Short-Term Rental Tax & Affordable Housing Fund."
<https://www.cityofaspen.com/1338/Short-Term-Rental-Tax>
City of Bend, OR. "Short-Term Rental Program."
<https://www.bendoregon.gov/government/departments/community-development/short-term-rentals>

Public Participation and Planning Best Practices

Washington State Department of Commerce. "Growth Management Act: Public Participation."
<https://www.commerce.wa.gov/serving-communities/growth-management/growth-management-topics/public-participation/>

From: [Mary Kelly](#)
To: [Mindy Brooks](#)
Subject: STR regulations in Packwood
Date: Sunday, June 29, 2025 9:47:25 AM

6-25-25

Dear Mindy, Lewis County Planning Committee, and Lewis County Commissioners,

My husband and I attended the Packwood Community Meeting on June 23rd and would like to share our thoughts with you. We bought a house in Upper Timberline almost 8 years ago because we love the area and the Packwood community. We come to Packwood at least once or twice a month throughout the year. We also rent our cabin when we aren't using it, to help cover the costs. I wish we didn't have to rent our cabin, but this is how we're able to own a vacation home in Packwood. We have witnessed the increase in housing prices over these years and with a quick google search it looks like there is just 1 studio apartment for rent (for 1,500/month). There is a housing crisis for locals and we appreciate efforts to address this.

However, the proposed regulations, specifically in the Timberline community, will not create affordable or long term housing for local residents. In fact a cap on STRs in the Timberline community seems to be slightly short sighted and could backfire on the community. Timberline was developed for vacation homes and the majority of owners that I've talked to in Timberline have bought a house here because they want to come here to vacation, and do so frequently. We will not be renting our houses long term, because we use our houses.

Those of us that also rent out our homes, to help pay for costs, provide a lot of economic revenue to Packwood. Not just through our taxes, but by using local contractors to maintain our properties, buying needed supplies locally at ACE hardware, and paying our cleaner well, who lives in Packwood. We love Packwood and we plan on retiring here. We frequent the local restaurants and shops. We buy our Christmas presents at the Mercantile and the Pottery Gallery. We are invested in supporting the businesses and local community of Packwood. My husband grew up in a small town in North Dakota and we know first hand how important it is to support local businesses.

Another quick google search for other areas that have put in place regulations for short term rentals, such as Snohomish, Snoqualmie, Hood River and Bend, and it appears that the area you should be focused on is the area directly in town, specifically the smaller neighborhood homes that would be more affordable, and most importantly the new mixed use buildings and multi-family buildings that are being developed. Hood River did not regulate commercially zoned areas and those multi-family units, which are more affordable for local residents, are being used for short term rentals. STR regulations in Hood River and

Bend, which have been in place for 10 years, have not directly led to increased affordable housing. I may have missed this, but is there a plan to incentivize the developers for affordable long term rentals in town?

I urge you to please reconsider these plans. We want something that will actually help the local community and alleviate the housing crisis. This current plan does not seem to do that. A cap on STRs in communities like Timberline seems like it would only hurt the community:

- A decrease in tax revenue
- Loss of business to local handymen, contractors, and cleaners
- Local businesses would suffer since we wouldn't need to buy as many supplies, and our own personal financial hit would mean we wouldn't have as much money to spend in the community when we're in town.

A cap on STRs in communities like Timberline also doesn't make sense because:

- These are our vacation homes and we use them. All of the owners I know live a short drive away and we would not be open to long term rentals of our homes.
- Most of the homes in this area would be quite expensive for local residents to long term rent.
- We have been short term renting our properties for years without issues. We are not getting noise complaints, complaints about parking or trash.
- We are outside of the town of Packwood

Sincerely,

Mary and Gannon Kelly

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From: [Courtney Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Request for Revisions to Proposed STR Regulations
Date: Monday, June 30, 2025 8:09:07 AM

Some people who received this message don't often get email from courtneyneville16@gmail.com. [Learn why this is important](#)

Dear Commissioners,

Given the serious risk of destabilizing our local housing market, I urge the County to carefully reconsider the current approach to short-term rental (STR) regulation. The proposed changes could have far-reaching consequences—not only for individual property owners, but also for HOAs, essential community infrastructure, and the County’s own tax base.

Our region welcomes over **1 million visitors annually**, bringing **millions of dollars in tourism spending** to local businesses. Short-term rentals play a vital role in accommodating these travelers, especially in areas like Packwood and Ashford, where hotel options are limited. Restricting this housing supply risks straining our tourism economy and undermining the very foundation that supports many local jobs and services.

In light of these concerns, I respectfully request the following revisions to the proposed regulations:

1. **Legacy status for all current STR operators** — regardless of density caps — to avoid sudden financial harm to existing owners and prevent further market disruption.
2. **License transferability upon property sale**, preserving property values and ensuring fairness for both current and future homeowners.
3. **Inclusion of all visitor accommodation types**, including yurts, tiny homes, and RVs, which offer essential flexibility in a rural, tourism-driven region.

A one-size-fits-all regulatory model risks unintended consequences in unique communities like ours. I ask that you adopt a more balanced and inclusive approach that protects current operators, maintains a stable real estate market, and supports the County’s ongoing economic vitality.

Thank you for your time and consideration.

Sincerely,
Courtney Neville

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Written Testimony – Lewis County Planning Commission

Re: Chapter 17.105 – Proposed Short-Term Rental Regulations

Submitted by: Joe Loeffler, owner of 103 Portal, 105 Portal, 154 Alpine - Packwood

Date: June 30, 2025

To the Lewis County Planning Commission,

I appreciate the opportunity to submit written comments on the proposed short-term rental (STR) regulations outlined in Chapter 17.105. As someone who has built five homes in Packwood since 2019, I have a firsthand understanding of the economic and development realities in our community. I write today to express concern that the proposed caps and use restrictions—though well-intentioned—will not reduce housing costs and, in fact, may actively harm our fragile local economy.

Economic Reality: Caps Will Not Lower Housing Costs

The foundational assumption behind these regulations appears to be that limiting STRs will improve housing affordability. However, economic research and real-world case studies show otherwise.

In cities such as Santa Monica and New York City, STR restrictions led to dramatic reductions in listings, but **had no meaningful impact on rental prices**. In Santa Monica, a 60% drop in listings failed to move the needle on affordability. In New York, the enforcement of Local Law 18 eliminated more than 80% of short-term rentals, but long-term rents continued to rise and hotel prices surged. These cities have resilient and diversified economies—Packwood does not. (*References 1-4*)

Packwood's economy is built on tourism. Our restaurants, outfitters, festivals, and seasonal businesses rely on visitors who stay in short-term rentals. Restrictions that limit STR activity, even indirectly, risk cutting off the economic oxygen that keeps the town alive. Many county residents who do not own STRs rely on these businesses for their livelihood.

Going a step further, in 2023, Wilmington, NC passed STR restrictions similar to what is being proposed in Lewis County. These new restrictions were successfully challenged by property owners as an unjust removal of protected property rights. The resulting litigation and payout left the city with an \$800k liability (*Reference 6*).

Construction Economics: Supply Is the Real Issue

If the goal is to create more affordable long-term housing, we must start with a basic truth: **we have a supply problem**, not a use problem. Capping STRs does not add housing—it simply freezes the existing imbalance in place.

New home construction is already financially challenging in Packwood. It costs at least \$250 per square foot to build, not including land or utility connections. At that price, **a modest 1,200 sq ft home can easily cost \$500k+ (Reference 5)**. Given market rents in Packwood, long-term rentals cannot generate enough income to justify that investment. In many cases, short-term rental revenue is the only way a new build becomes financially viable. When people build more homes, regardless of use, it adds units to the available housing stock. With new competition, less active STRs may exit the market and become long term rentals.

In addition, if home values are pushed down by aggressive regulation, banks will reduce or deny construction lending. Lower appraisals mean less collateral, and builders are often required to bring 20–30% equity to the table. When the math no longer works, **construction simply stops**.

The Real Risk: Corporate Consolidation

While I oppose blanket caps, I agree that **we must prevent corporate consolidation of local housing**. The real threat to affordability is large-scale institutional investors buying dozens of homes, removing them from the ownership pool and inflating prices artificially.

To address this, in partnership with owners of **more than 70 Lewis County properties**, we have proposed a **10-unit ownership cap** per individual or entity. This limit targets the specific behavior we want to prevent—bulk acquisition—while still allowing small-scale operators, second homeowners, and locals to participate and invest in the STR economy. The ownership cap is enforceable, fair, and preserves the community character we value. It is also in line with the Sub-Area Plans goal of discouraging big-box or chain stores and ‘keeping Packwood local.’

At the same time, the revised version of Chapter 17.105 preserves every core health and safety requirement, including:

- Annual permit renewal
- Valid liability insurance
- Septic and trash compliance
- Quiet hours and occupancy limits

These provisions ensure that STRs remain good neighbors and meet basic standards of responsibility.

Conclusion

Packwood is not New York City, Palm Springs, or Santa Monica. We are a small town with a tourism-dependent economy and a housing shortage that will not be solved through restriction. If these rules are adopted as currently written—especially the 25% cap and limitations on ADUs—we risk stalling construction, discouraging investment, and shrinking our local tax base.

I urge the Commission to revise the proposed ordinance by:

1. **Eliminating the neighborhood-based cap** and restrictions on ADUs.
2. **Implementing a 10-property ownership cap** to curb corporate overreach.
3. **Maintaining health, safety, and operational standards** for STRs.

This balanced approach protects both the long-term interests of the community and the short-term viability of our local economy.

Sincerely,

Joe Loeffler
loeffler.joe@gmail.com
206-295-1567
www.staycampcabins.com

References & Supporting Evidence

1. Santa Monica, CA – No rent relief despite strict STR rules

- After a 60% reduction in short-term rentals due to aggressive enforcement of their Home-Sharing Ordinance, researchers found **no statistically significant effect on rental prices** or housing availability.
→ *Chaves, C., et al. (2022). "Short-Term Rentals and Housing Affordability."*
[Link to study](#)

2. New York City – Drastic STR cuts, rising rents

- Local Law 18 (2023) led to the deactivation of **over 15,000 Airbnb listings** in NYC.
- Within six months, **median rents reached a record \$4,050**, and hotel prices rose 7% year-over-year.
→ *Reuters (2024): "NYC Sees Record Rents, Hotel Rates as Short-Term Rental Law Takes Effect."*
[Read article](#)

3. Palm Springs, CA – STRs are core to tourism economy

- A 2021 impact study found short-term rentals supported **\$274 million in local economic activity** and **2,100 jobs** in Palm Springs.
→ *Palm Springs Short-Term Rental Impact Study (2021)*, Economic & Planning Systems, Inc.
[View summary](#)

4. National Trends – Little evidence STR restrictions improve affordability

- A 2023 roundup by the National STR Alliance concluded that **STR regulations in large cities rarely shift inventory to long-term rentals** and **almost never reduce prices**.
→ *NASTRA Policy Brief (2023): “The Limits of STR Caps”*
[Visit source](#)

5. Construction costs in Washington State

- Residential construction costs in rural Washington averaged **\$225–\$275/sq ft in 2023**, not including land, utility connections, or soft costs.
→ *RSMMeans Construction Cost Database, WA 2023*
→ *Builder interviews, Lewis County, WA*

6. North Carolina STR Litigation & County Payouts

- **Schroeder v. City of Wilmington (2022–2023)**
 - Plaintiffs successfully challenged Wilmington’s STR registration fee, density caps, and permit system under state law.
 - Wilmington was ordered to pay **\$304,564** in legal fees plus **\$2,055** in court costs.
whqr.org+11wect.com+11envisage.law+11
 - The city also refunded around **\$443,428** in registration fees to property owners, along with **\$57,867** in accrued interest. Overall, municipal liability exceeded **\$800,000**. wect.com

From: [John Maulding](#)
To: [Mindy Brooks](#)
Subject: testimony for July 8 planning commission meeting
Date: Monday, June 30, 2025 4:59:09 PM

Hi Mindy,
Here is what I would like to say in regards to the county comprehensive plan.

I am not in favor of the proposed regulations that will limit short term rentals in Lewis County. It should be stated that I do not WANT to rent my home out. I HAVE to rent my home out. It is the only way that the ends meet. Renting rooms to people who need them is the most normal thing I can think of, and to suggest otherwise smells of a government overreaching their boundaries.

Thank you,
John Maulding

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From: [Betsy Steinhart](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Opposition to Proposed Short-Term Rental Regulations in Lewis County
Date: Monday, June 30, 2025 3:08:31 PM

Some people who received this message don't often get email from bsteinhart76@gmail.com. [Learn why this is important](#)

Dear Commissioners,

My name is Betsy Guerreiro, and I am the owner of Betsy's Cabins, a locally operated short-term rental management company serving the Lewis County area. We currently manage 14 cabins in the Ashford area, and our work directly supports not only my family but also supports the households of ten local employees with children—cleaners, maintenance technicians, and a full-time manager. Our average employee earns \$30 per hour, plus benefits including a 401k—a wage well above many local service positions.

I took over this business in 2015, from another local family who had been operating a cabin rental business since the 80's. Our team is deeply rooted in this community. We have funded and hosted many free events for our community, including community bingo nights, movie nights, an Easter egg hunt, and a Halloween trunk-or-treat event. My goal was always to be a good member of our community and bring more to Ashford than I took.

My business volunteers with several local organizations, including the Mt. Rainier Business Alliance, Bavarian Retreat HOA, and Paradise Estates HOA. I strive to be active and engaged, listening to the needs of my employees and fellow community members.

Ashford has been a gateway/vacation community since the early 1900's. The majority of our guests visit to explore Mt. Rainier National Park. We have limited lodging options with only a handful of hotels. Without short term rental accommodations, our area would not be able to support the million plus tourists who visit the national park each year. As the Seattle/Tacoma population continues to grow, so does park visitation.

We take great care to ensure guests are respectful and non-disruptive to neighbors, utilizing guest verification protocols, clear occupancy limits, cameras on driveways and entry points, and on-call representatives who can respond to any concern within 30 minutes.

In addition to creating high-quality jobs and hospitality, our business contributes significantly to the local economy and public services. Each new cabin we build pays approximately \$4,000 in impact fees to support county infrastructure. On average, each property contributes \$7,000 annually in lodging and sales taxes, and \$3,000 in property taxes.

We understand the county's interest in achieving balance between tourism and housing needs. However, the current proposal—including a 25% density cap and a prohibition on license transfers upon the sale of a property—would destabilize the real estate market and put at risk the jobs, services, and revenues that short-term rentals help generate.

To ensure true balance, we respectfully request the following revisions:

- **Grandfather all current short-term rental operators** outside of the proposed 25% density cap.
- **Allow licenses to transfer with the sale of property**, to prevent financial disruption to owners and ensure long-term stability in the community and housing market.

These adjustments will allow responsible operators like us to continue contributing positively to the community, supporting local jobs, and welcoming guests who fuel the outdoor tourism economy that Lewis County depends on.

Thank you for your time and consideration.

Sincerely,
Betsy Guerreiro
Owner Betsy's Cabins

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From: [Robert Bailie](#)
To: [Mindy Brooks](#)
Subject: Opposition to Short Term Rental regulations in Lewis County
Date: Tuesday, July 1, 2025 7:43:25 PM

[You don't often get email from 19525192rb@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Commissioners,

I am Bob Bailie and the owner of a single short term rental property in Lewis County at 345 Skate Creek Rd. It is called Hikers Hideaway. I bought the cabin there in 1976 when I was 23 years old. Through the course of my ownership and with the help of the commissioners, my neighbors and I fought off and closed down all the drug houses on my road and saved the area from degrading into a crime zone. In the early 90s, I alone, rallied the community here and sent out letters advocating for the No Shooting Zone that we have on Skate Creek and Kernahan roads. The Lewis County Commissioners held a public testimony and vote in the packed fire station. The vote was unanimous but for three dissenting individuals. The signs are still standing to this day. Great thanks for your help in that endeavor.

Now I am asking for your help once again as we are confronting restrictions on the number of STRs that will be allowed. I have one STR and that provides my retirement income (I retired in 2017). I have sunk enormous resources into that property in order to make it a superb experience for the guests. I cannot afford to have it closed down. It is managed by Betsy Steinhart, of Betsy's Cabins who does an amazing job for me. She works harder than anyone I have ever known. Betsy came from very humble beginnings and started with practically nothing before creating a wonderful business that enormously benefits east Lewis County.

On behalf of both of us, I ask you, implore you, to grandfather in all the existing STRs and allow licenses to transfer with the sale of the property. The current owners and property managers are the ones who developed the market through hard work, many setbacks and absolute grit'. This would be the fair thing to do.

Thank you
Bob Bailie in Ashford.
Sent from my iPad
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From: [Denette Neville](#)
To: [Mindy Brooks](#)
Subject: Short-Term Rental Regulations
Date: Tuesday, July 1, 2025 8:55:43 AM

You don't often get email from denetteneville@gmail.com. [Learn why this is important](#)

Dear Mindy & Lewis County Planning Committee,

I'm writing to express my opposition to the recent proposed short-term (STR) rental restrictions.

I've owned my home for over twenty years, and it is more than just a property to me. It is where my children grew up skiing and working as ski cadets at White Pass, creating lifelong memories in the mountains.

To help with the cost of ownership, I have rented it out when we weren't using it. Now, as a recent widow and senior citizen, that income is critical to my ability to support myself and stay financially stable.

Placing density caps that may prevent me from continuing to rent my home would take away that vital support. Additionally, creating a license that is not transferable to the next owner significantly impacts the value of my home and every home in this area, regardless of whether it's currently used as a short-term rental or not.

This home is part of my family's story and now, part of my security in retirement. I do not support the regulations as written.

Sincerely,

Denette Neville

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From: [SHEELAGH HARKA](#)
To: [Mindy Brooks](#)
Subject: The Nest@Pinelodge
Date: Tuesday, July 1, 2025 11:32:07 AM

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To whom it may concern, I am writing to support the continuation of the Nest@Pinelodge as a short term rental. I know that Irene Hartzell Botero and Joseph Taiwo proceeded with the building of this beautiful rental with all the correct planning and permits in place. Taking away their STR ability would be detrimental to the Packwood community. They are active in supporting the community in so many ways, their taxes notwithstanding. Thank you for your consideration. Sheelagh Harka

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July 1, 2025

To the Lewis County Planning Commission,

Thank you for the opportunity to share information related to the proposed short-term rental (STR) regulations. Visit Rainier supports tourism in the Mount Rainier region, including the East Lewis County communities of Packwood, Mineral, and Ashford.

We work closely with local lodging partners and businesses in these areas and offer the following tourism-related context for your consideration.

Lodging Inventory in Eastern Lewis County

Tourism in this part of the county depends on a mix of short-term rentals, a small number of motels, and seasonal campgrounds:

- Short-Term Rentals (Visit Rainier estimate)
 - Approx. 400 in Packwood
 - 150 in Ashford (Lewis side)
 - 9 in Mineral
- Hotels/Motels (Visit Rainier partner inventory)
 - 6 properties totaling 140 rooms
- Campgrounds
 - Public and private campgrounds offer seasonal capacity—tent sites, RV hookups, and glamping sites—but are not available year-round

STRs make up an estimated 80% of all available overnight accommodations in the Lewis County communities of Packwood, Mineral, and Ashford.

STR Market Performance

(Source: Airdna, 2025)

According to third-party data provider Airdna, STRs in these communities show consistent demand:

- Packwood: 52% occupancy | \$269 ADR | \$37,100 annual revenue
- Ashford (combined Lewis and Pierce): 59% occupancy | \$256.30 ADR | \$37,600 annual revenue
(Approx. 150 of 406 Ashford listings are located in Lewis County – Visit Rainier estimate)
- Mineral: 54% occupancy | \$269.40 ADR | \$37,200 annual revenue
(Note: Airdna reports 60 listings in Mineral, but Visit Rainier has verified 9 active STRs)

These properties serve families, recreation groups, and national park visitors—many of whom stay multiple nights and spend locally.

Mount Rainier National Park Drives Demand

(Source: National Park Service, 2024)

Mount Rainier National Park received over 1.6 million visitors in 2024. Vehicle entries included:

- 300,000+ through the Nisqually entrance (Ashford)
- 100,000+ through the Ohanapecosh entrance (Packwood)
- Additional traffic through the White River entrance, with visitors often staying in Packwood or Ashford due to limited lodging in the park

These three entrances account for the majority of park access. While not all visitors stay overnight, many rely on nearby lodging—including STRs.

Visitor Capacity Estimate

(Visit Rainier modeling) Using conservative assumptions (2 guests per unit):

- STRs in Packwood, Ashford, and Mineral: ~1,100 guests per peak summer night
- Hotels/Motels: ~280 guests
- Campgrounds: Seasonal capacity, weather dependent

This brings total lodging capacity to approximately 1,400 overnight guests during high-demand periods.

Multiple lodging partners have told Visit Rainier they expect the proposed regulations, if approved as written, could result in the loss of up to 50% of available STR inventory in East Lewis County.

A 50% reduction in STR inventory could eliminate space for more than 550 overnight visitors per night, significantly limiting the region's ability to host travelers—especially when campground availability is impacted by weather, wildfire smoke, or seasonal closures.

Potential Economic Impact

(Sources: National Park Service Visitor Spending Reports & Visit Rainier modeling)

According to the National Park Service, overnight visitors spend an average of \$1,100 per trip in Mount Rainier's gateway communities—covering lodging, meals, fuel, recreation, and retail.

If STR inventory is reduced by 50%, the region could lose accommodations for 500 guests per night—equivalent to every motel, lodge, and campground being full, and still turning away hundreds of visitors.

Even a single summer weekend could result in 1,000 fewer guests staying, dining, and shopping in Packwood, Ashford, and Mineral. Over a 15-week summer season, this adds up to 15,000 lost overnight stays—and approximately *\$8 million in visitor spending no longer captured by Lewis County businesses.*

This does not include secondary impacts such as reduced employment, lower local tax revenue, or decreased income for outdoor recreation providers and seasonal events.

We encourage the Planning Commission to consider the scale of visitation to eastern Lewis County—and the critical role STRs play in meeting that demand.

Thank you for your time and thoughtful consideration.

A handwritten signature in cursive script that reads "Meilee Anderson".

Meilee Anderson
Marketing, Visit Rainier
marketing@visitrainier.com

From: [Rebekah Velasco](#)
To: [Mindy Brooks](#)
Cc: SweetDirtFarmer@gmail.com
Subject: Written Comment Re: STR Regulations
Date: Tuesday, July 1, 2025 5:12:20 PM

You don't often get email from rebekahannvelasco@gmail.com. [Learn why this is important](#)

Hi Mindy,

I wanted to write in to say that if these regulations pass, I could lose my job. I work for Packwood Brewing Co. managing their two apartment STR units above the brewery. If only one of those dwellings is rentable as an STR, my salary would not be justified and I would lose a stable job in the Packwood economy, where I own a home. I truly hope that you will consider the impact to the economy that depends on Short Term Rentals and tourism in Packwood when making this decision as it will have a very real and negative impact on my life.

Thank you,

Rebekah Velasco
135 Willame Street W
Packwood, WA 98361

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Planning Commission

Lewis County Washington

RE: Draft Proposal for Short Term Rentals

Dear Commissioners,

I am writing to request that you do not approve the proposed STR regulations. I have owned a cabin in High Valley since 2015. My wife grew up in Federal Way and her family has had a cabin in High Valley since the early '70s. We were lucky enough to purchase the cabin and spend summers in Packwood to escape from the Arizona heat. I teach college classes and am able to teach online during the summer. Our children have grown up enjoying Washington and spending time with their grandparents.

We rent our cabin in the winter months for several reasons. One the most important reasons for me is to share our cabin with families who are looking to have the kind of experiences my family has had in the cabin. Knowing that visitors are making memories in the cabin seems to fulfill its purpose. Reading the positive reviews after guests have stayed is very rewarding. I also like the fact that people being in it make it feel lived in and alive. When we didn't rent, the cabin would be musty and sad from being closed up for nine months. We use TMC Vacations as our management company and they do an excellent job cleaning and maintaining the cabin when we are not there. Knowing that someone is using the cabin and caring for it is very important.

The main reason for renting our cabin is not monetary. It helps us offset the costs of a second home, but it does not generate a large income. We paid \$130, 000 for the cabin in 2015. This year, the tax assessor assessed it at \$709, 000. Last year, we generated \$10, 000 in rental income, but we paid \$5,000 in county taxes. When you add in \$100/mo for Internet services, monthly electricity costs, HOA dues, there is little left over. What is left over is used to update the cabin which was built in 1985. Two years ago, we replaced the *original* carpeting with laminate flooring. Everything else is from 1985. This is not a money-making venture. It is a service venture—providing guests with an opportunity to visit Packwood and make memories.

I believe the proposed regulations along with the exorbitant taxes will discourage us from renting the property and diminish the economic benefits to the county. I have attended several of the meetings in Packwood in person and via Zoom. At the last meeting in June, Mindy Brooks stated, "we want to take every tourist, turn them upside down and shake all the money out of their pockets and then send them home." I understand her desire to generate income for the county, but I wonder how imposing a 25% cap on STRs will accomplish that. It would be like telling one of the local businesses only 1 out of 4

customers can buy anything. Singling out STRs for additional garbage structures, adding permit costs when taxes are already higher than residential homes and other burdensome hurdles just seems unfair. When I drive around High Valley, it is not the STRs that need attention. It is the dilapidated, never-used cabins and campers that need to be addressed. I realize this is probably an HOA matter, but I hope you see my point. STRs add value economically and aesthetically to a community that relies on tourist dollars for nearly all of its income.

In conclusion, I want to stress that STRs bring benefits to the county and should be supported rather than overly administrated and regulated. Any concerns could be handled on a case-by-case basis instead of with a broad stroke of the pen. We look forward to continuing to provide an opportunity for visitors to enjoy Lewis County and all the beautiful experiences it offers. We already pay more in taxes. We are good members of the community. We bring additional visitors and revenue to Lewis County. Please support STR owners in opposing this proposal.

Sincerely,

James T. Abraham

157 Sunstone Road

Packwood, WA 98361

July 1, 2025

Lewis County Planning Commission
c/o Lewis County Community Development
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Members of the Planning Commission,

I am writing to express my concern regarding the proposed short-term rental (STR) regulations in Lewis County. Our family's love for Packwood began with backpacking trips in the surrounding wilderness in 2012. In 2021, we were fortunate to purchase a home in the area, with dreams of retiring there. Since then, we've become part-time residents, active community members, and conscientious short-term rental hosts. We take pride in maintaining our home, supporting local businesses, and sharing Packwood responsibly with guests who appreciate its unique character.

We are deeply concerned that the proposed regulations could make our dream of retiring in Packwood impossible. Restrictions on permit availability and increased operating costs would create significant barriers for homeowners like us, those who are already invested in the long-term health of the community and who operate short-term rentals with care for our neighbors. While we understand and support the County's desire to address housing availability, we believe that a more balanced and nuanced approach is needed, one that distinguishes between absentee, commercial operators and small-scale, responsible hosts like us.

First and foremost, I am troubled by the lack of direct outreach to those most affected by these proposed changes. Despite the county previously hiring a third party to identify all STRs, owners like myself were not notified directly about these significant regulatory proposals. My family only learned of the proposed regulations by chance through social media. This lack of advance notice and direct communication undermines trust and suggests a desire to exclude STR owners from the process. Why wasn't there a longer lead time or a direct notification to STR owners, given that our contact information is already on record?

Packwood has a history of engaging community members through subarea planning committees. Yet, it appears these groups have not been meaningfully involved in the STR regulation process. The speed with which these proposals are being advanced has left little room for public comment or thoughtful discussion. Why not adopt a phased approach that allows for genuine engagement and partnership with STR owners to find workable solutions? STR operators are eager to collaborate and be part of a process that balances community needs with economic realities.

Another concern is the absence of data-driven analysis or references to best practices from similar communities. What is the estimated impact of these regulations on local businesses that rely on the tourism STRs bring to Packwood? Without this information, it is difficult to assess

whether the proposed rules will achieve their intended goals or simply create unintended economic harm. Further, there is abundant data available from regions that have implemented similar policies, with harmful effects on local businesses and residents' livelihoods.

The proposal to require posting management contact information on signs in front of STR properties raises serious privacy and safety issues. Such signage not only compromises the privacy of property owners and guests but also highlights properties that may be vacant, potentially inviting criminal activity. There must be alternative ways to ensure accountability without jeopardizing safety.

The proposed licensing requirements are vague and create significant uncertainty for STR operators. What will the permitting process cost? Why aren't existing operators being "grandfathered" in? How can STR owners plan for the future or market their properties if they are unsure whether they will be allowed to operate from year to year? This instability threatens to drive responsible operators out of business, which would be a loss for both the community and the local economy.

Finally, the proposed regulations appear to impose requirements on STRs—such as inspections, carbon monoxide detectors, fire extinguishers, and contracted solid waste removal—that are not required of long-term rentals. This creates an uneven playing field and seems punitive rather than protective.

Our love for Packwood started with backpacking in the area.

I urge the Planning Commission to reconsider the current approach. Engage STR owners and other community members as partners in crafting fair, effective regulations. Use available data, learn from other communities, and ensure that all voices are heard. The county should employ a collaborative approach to develop policies that protect residents, support local businesses, and allow responsible STR operators to continue contributing to Packwood's vibrant community.

Thank you for your attention and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stefan McKenney', written in a cursive style.

Stefan McKenney
Packwood STR Owner
242 Mountain View Drive
Packwood, WA 98361

From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Opposition to Proposed STR Restrictions in Packwood
Date: Wednesday, July 2, 2025 10:25:07 AM

Kate Chatterton

Administrative Assistant Sr
Lewis County Board of County Commissioners
360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: Steve Pifer <swpifer@comcast.net>
Sent: Wednesday, July 2, 2025 8:46 AM
To: BOCC <BOCC@lewiscountywa.gov>
Subject: Opposition to Proposed STR Restrictions in Packwood

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Dear Lewis County BOCC,

I'm writing as a long-time property owner and active participant in the Packwood community to express strong opposition to the proposed Short Term Rental (STR) restrictions currently under consideration.

My family has operated our modest duplex in Packwood as a STR for over 12 years. With just one bedroom and one bathroom per unit, both sides must remain available as STRs in order for us to afford and maintain our vacation home. STRs like ours are not just a personal benefit — they are a vital part of Packwood's tourism economy and housing landscape.

Please consider the following reasons to reject these proposed restrictions:

- STRs Are Essential to Local Tourism: Packwood is a tourism-based

economy. STRs allow the town to flex with seasonal demand in a way that hotels with a fixed number of rooms cannot.

- Unintended Financial Consequences:
 - Limiting STRs or guest capacity will artificially raise nightly rates, inflate STR property values, and drive up housing prices across Packwood.
 - This makes the community less accessible to both tourists and potential residents.
-
- Unjustified Requirements:
 - Garbage Storage: STRs should not be held to higher standards than Long Term Rentals (LTRs) or homeowners, who are not required to store garbage indoors.
 - Capacity Limits: These limits were not requested by the community, and there is no data suggesting they would increase housing availability.
 - Septic & Well Inspections: Not required for LTRs or homeowners. My septic system is just two years old and fully compliant.
 - \$1,000,000 Liability Insurance: This is not a requirement for LTRs and would be an unfair burden on STRs.
-
- Local Economic Harm:
 - TMC Vacations, the largest STR-related employer in Packwood, may face layoffs. This affects housekeepers, repairmen, landscapers, and others.
 - Fewer STRs will result in fewer visitors — which means fewer customers for local shops, restaurants, and services.
 - According to Harvard Business Review, increased tourism directly supports local job growth and small business health.

-
- Equity and Fairness:
 - If permit caps are enacted, current STR owners must be given priority. Many of us have invested years and resources into maintaining our homes and serving visitors.
 - Current STR owners are already being strangled by unfair additional taxation by the assessor's office, placing even greater financial strain on those of us operating responsibly and transparently.
-

In summary, the proposed STR restrictions would do more harm than good — punishing existing homeowners, reducing tourism, and shrinking local employment opportunities. Packwood's vitality depends on tourism, and STRs are a flexible, effective way to support that.

Thank you for your consideration.

Steve Pifer
Becci Pifer
(253) 223-5490

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From: [Sara Redfield](#)
To: [Mindy Brooks](#)
Subject: Lewis County's UGA – Small Towns and Short Term Rental Regulation Proposal
Date: Wednesday, July 2, 2025 3:35:48 PM

You don't often get email from redfield.sara@gmail.com. [Learn why this is important](#)

Mindy -

My name is Sara Redfield. My husband was born and raised in Packwood, and we were married here nearly two decades ago. Over the past 20 years, we've spent most of our summers in Packwood, and it holds a special place in our hearts as a true home—one where we've made lifelong memories and built lasting community ties.

While our primary residence is in North Bend, we return to Packwood as often as possible, staying in our RV and spending time on the property where we are in the process of building our future home. It's our intention to make this community our full-time residence within the next five years.

To afford the escalating costs of construction and mortgage payments, we've planned to rent our home as a short-term rental during the early years. Unfortunately, the proposed short-term rental regulations threaten to derail those plans. Our home won't be completed by the December 31, 2025 deadline, and we're concerned that we'll be ineligible for a permit. After making a substantial financial investment in this property, we now find ourselves facing uncertainty about our ability to sustain it.

I understand and respect the county's efforts to address housing challenges and maintain the character of the community. However, the proposed 25% cap on short-term rentals per neighborhood is too restrictive and fails to consider the circumstances of responsible homeowners like us. I respectfully ask the county to consider raising the cap to at least one-third of available housing per neighborhood. This would better balance the county's goals with the needs of families who are invested in Packwood's future.

While I appreciate Lewis County's attempt to respond to housing concerns, I worry that several aspects of the proposed short-term rental (STR) regulations may fall short of their intended goals and unintentionally harm homeowners and the broader community. I'd like to offer the following points for consideration:

1. STR Restrictions Won't Result in Affordable Long-Term Rentals

Limiting STRs won't meaningfully increase affordable housing options for local workers. Many of these homes are second residences that owners, like us, actively use throughout the year. Long-term leasing isn't feasible for us or for many others. In addition, high ownership costs mean these homes couldn't be rented long-term at affordable rates—rents would need to be far above local market rates just to cover expenses.

2. Requiring a Full Business License Is Excessive for Occasional Hosts

For homeowners who rent only occasionally, requiring a full business license is unnecessarily burdensome. Most STR owners are not running a business.

3. A 25% Neighborhood Cap Is Too Low

The 25% cap on STRs per neighborhood is overly restrictive. Increasing the limit to 33% (or

one-third) would still prevent oversaturation while allowing responsible owners to participate. Tourism is vital to the Packwood economy, and with limited hotel and motel options, STRs fill an essential role in accommodating visitors. Restricting them too severely could have unintended consequences for local businesses and the community at large.

4. Public Posting of Owner Contact Information Raises Safety Concerns

The requirement to post personal contact details—such as the name and phone number of the owner or property manager—at the roadside is deeply concerning. As a woman, I feel this poses a serious privacy and safety risk. Sharing that kind of personal information in a public-facing way creates unnecessary exposure.

5. Individual Homeowners Shouldn't Bear the Burden of the Housing Crisis

The national and regional housing shortage is a complex issue, not unique to Packwood. Addressing the housing shortage shouldn't fall solely on the shoulders of private property owners. If the county is truly committed to improving housing access, it should pursue broader strategies—such as incentivizing developers, property owners, and/or homeowners to build and offer affordable rentals—rather than restricting short-term rentals, which provide economic support for many families.

In conclusion, while I support the idea of responsible regulation, I believe the current proposal is too rigid and risks doing more harm than good. I urge the county to revise these rules in a way that supports housing goals while still respecting the rights of homeowners, protecting personal privacy, and maintaining the economic vitality of our tourism-dependent community.

Regards,
Sara Redfield

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From: [Travis Redfield](#)
To: [Mindy Brooks](#)
Subject: RE: Public Comment on Chapter 17.105 – Short-Term Rentals
Date: Wednesday, July 2, 2025 3:11:24 PM

You don't often get email from travis.redfield@gmail.com. [Learn why this is important](#)

Dear Lewis County Planning Commission,

My name is **Travis Redfield**, and I was born and raised in Packwood, Washington. Today, I write not just as a lifelong member of this community, but as a deeply concerned and compassionate citizen who wants to see a balanced approach to housing policy—one that supports local families, encourages economic growth, and respects the investments made by individuals like myself.

While our primary residence is currently in North Bend, my wife and I spend as much time as possible on our property in Packwood, camping in our RV and investing in our future home. Most of my family—including my father—still lives in Packwood, and we are building a home here with the intention of **moving and living full-time in Packwood within the next five years**.

However, in order to afford to complete and maintain this home—especially with today's construction and mortgage costs—we must short-term rent it for the first several years. Under the currently proposed regulations, **we may not even be eligible for a permit because our home will not be completed by the December 31, 2025 deadline**. If we fall outside the 25% cap and are denied a permit due to timing, we may be unable to afford the mortgage. We've already invested deeply in this project and now find ourselves in an uncertain and financially precarious situation due to these pending rules.

While I understand the intention behind the short-term rental regulations—to address housing shortages and maintain community integrity—I feel strongly that the proposed **25% cap on STRs per neighborhood is overly restrictive** and unfair to responsible private owners. I respectfully urge the county to **increase the cap to at least 35%**, which would still meet the county's goals without placing undue hardship on individual property owners.

I'd also like to raise the following concerns:

1. Regulations Will Not Increase Affordable Long-Term Housing Availability

Many STRs, including ours, are second homes that owners use periodically. These homes are not suitable for affordable long-term rentals because their operating costs are too high to be covered by market-rate rents. Simply put, limiting STRs will not automatically create affordable housing—it will just reduce availability for tourists and reduce income for local owners.

2. Business License Requirements Are Overly Burdensome

Requiring a full business license for homeowners who only rent occasionally seems unnecessarily bureaucratic. A streamlined permit or registration system would be more appropriate for casual, part-time hosts like myself, and less likely to discourage responsible participation.

3. Safety and Privacy Concerns with Posting Personal Contact Information

The proposed rule to post owner or property manager contact information roadside raises significant safety and privacy concerns. This requirement is especially risky for women and infrequent visitors and exposes homeowners to harassment or other threats. Contact information should be required to be submitted to the county—not displayed publicly.

4. Short-Term Rentals Support Tourism in Packwood

Packwood's economy relies heavily on tourism, and visitors need places to stay. The town lacks sufficient hotel infrastructure, so short-term rentals provide a vital function. Restricting them too aggressively could have a negative economic ripple effect for local businesses and the community at large.

5. Individual Homeowners Should Not Bear the Burden of Solving the Housing Crisis

The housing shortage is a complex issue caused by numerous factors including zoning restrictions, construction costs, and lack of incentives for affordable development. Putting the burden solely on short-term rental owners—many of whom are working hard to build their own dreams—feels misplaced. Instead, the county should consider incentivizing construction of affordable housing through tax breaks, subsidies, or other tools that do not pit neighbors against each other.

6. Homeowners Actively Building Should Not Be Excluded from Permitting

At a minimum, the county must ensure that property owners who are currently building homes—especially those with a demonstrated intention to live in Packwood full-time—are not excluded from eligibility due to arbitrary cutoff dates. Homeowners like myself, who have already made significant financial commitments, should be allowed to secure a short-term rental permit to protect that investment. Denying permits to owners in mid-construction creates uncertainty and unnecessary financial risk, which could ultimately discourage future development in the area.

7. Large-Scale Investors and Developers Should Bear More of the Regulatory Burden

If the county's goal is to limit the impact of short-term rentals on housing availability, the regulations should distinguish between **individual property owners** and **large-scale STR operators or corporate investors**. The burden of compliance and cap restrictions should fall more heavily on commercial or multi-property STR portfolios, not on families like mine who are simply trying to cover mortgage costs while building a future in the community. A one-size-fits-all approach unfairly penalizes residents while letting profit-driven operations continue unchecked.

Recommendations to Improve the STR Policy Framework

To better achieve the county's goals while preserving economic opportunity and fairness, I respectfully offer the following recommendations:

- **Implement a Tiered STR Cap System**

Differentiate caps for owner-occupied, single-property STRs versus corporate or investor-owned portfolios. Consider exempting owner-builders or primary residence STRs from neighborhood caps.

- **Offer Priority Permitting to Future Full-Time Residents**

Create a priority or guaranteed permitting process for homeowners who can demonstrate

intent to occupy their home full-time within a defined timeframe (e.g., 3–5 years).

- **Reinvest STR Revenue into Local Housing Solutions**

Use any STR permit fees or taxes to directly fund affordable housing initiatives, infrastructure, or workforce development programs that benefit local residents.

- **Promote Long-Term Housing Through Incentives, Not Punishment**

Provide incentives for homeowners to build or convert accessory dwelling units (ADUs) for long-term rental instead of limiting STR use across the board.

- **Incentivize Developers and Corporations to Build Affordable Housing**

Rather than limiting responsible homeowners, the county should create **programs and incentives for developers and corporations**—those with more financial leverage—to construct or dedicate affordable housing units. This could include tax credits, density bonuses, fast-tracked permitting, or land use flexibility in exchange for producing or funding affordable housing supply.

In conclusion, I urge Lewis County to take a more balanced and nuanced approach—**raise the cap from 25% to at least 35%, and ensure current builders are not excluded due to arbitrary timelines**. Consider shifting the burden toward corporate or speculative STR operators rather than residents with deep ties to the community.

Thank you for your time and thoughtful consideration. I welcome further discussion and truly hope the final policy reflects the values and priorities of Packwood’s full-time, part-time, and future residents alike.

Sincerely,
Travis Redfield

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From: [Lara Wood](#)
To: [Mindy Brooks](#)
Subject: STR Proposal Comments
Date: Wednesday, July 2, 2025 7:34:08 AM

You don't often get email from lara_r_wood@yahoo.com. [Learn why this is important](#)

To the Lewis County Planning Commission,

As owners of a cabin in Paradise Estates in Ashford, we are writing to express concerns about the proposed short-term rental regulations in Lewis County. While we understand the intent to protect affordable housing and ensure community safety, we are troubled by the lack of an evidence-based foundation for the current proposal.

We own a single cabin, purchased for our family's personal use, which we now rent part-time to share the space and help offset ownership costs. Built in the 1960s, the cabin is over 1,600 square feet and includes an enclosed bedroom, an upstairs bedroom without a door, and a two-bed sleeping loft. It also has 1.5 bathrooms and comfortably accommodates six people. Under the proposed cap, however, we would be limited to just five guests—an arbitrary restriction that doesn't reflect the layout or capacity of the home.

We are also concerned about the proposed requirement to store garbage indoors. In a rural setting like Ashford, this is not only impractical but presents real health and safety risks due to the likelihood of attracting rodents.

Ashford is a valuable asset to Lewis County and to Western Washington. The proposed regulations would have significant unintended consequences—especially reduced tax revenue and tourism, both of which local businesses rely on. It was particularly disappointing to hear at the June 23 meeting that these regulations are not supported by data or measurable outcomes. The economic downsides are clear; the benefits are speculative at best.

Thank you for listening to voices in the community, including ours. We strongly encourage the Lewis County Planning Commission to defer regulation of short-term rentals in Ashford to local HOAs who better understand the character and needs of their neighborhoods.

Sincerely,

Lara and Dan Wood
267 Paradise Drive
Ashford, WA 98304

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From: [CR COLLERAN](#)
To: [Mindy Brooks](#)
Subject: Packwood area
Date: Wednesday, July 2, 2025 11:55:47 PM

Hello Mindy,

I wasn't able to attend the last public meeting, but in reading the notes I do have a few comments and questions:

I'm in the Roundwood area. What would be considered my neighborhood?

Comments:

It appears that the cost of long-term rental housing is a big issue in Packwood. This is a problem throughout Western Washington, and especially in areas that are attractive to live or to recreate. Fortunately for those who own property in the area, Packwood is a lovely place to live. However, that draws more people to the area and increases the cost of housing. And because recreation draws people who might have a high standard of living and builders will build to the highest possible dollar, new housing is also going to be expensive. Consider Leavenworth, Whistler, Whitefish...all attractive areas to recreate and all have the same issue with little affordable housing for employees. There are perhaps some ways to address this:

- 1. Lewis County subsidize housing;**
- 2. Employers pay their employees higher wages;**
- 3. Allow co-living housing where there are small private rooms with bathrooms but shared kitchens;**
- 4. Promote low income housing via incentives and subsidies to builders.**

I am nearly positive that opening the door to more density as currently being proposed will not solve the housing problem, though it will bring more people to Packwood to own recreational property and they will have nicely designed townhomes and condominiums.

Zoning alone will not solve the housing affordability issue.

The current value of housing does not permit most properties to be rented out at a low-income level because mortgages, taxes and insurance are much higher than that low-income rent level. And values have only risen, as everyone knows, and most likely will continue to rise.

Thank you for providing so much information regarding this planning project.

Sincerely,

Carol Colleran

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From: [lisa lauer](#)
To: [Mindy Brooks](#)
Subject: STR Management in Packwood_Comment Letter
Date: Thursday, July 3, 2025 10:54:04 AM

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Dear Mindy,

Thank you for the opportunity to submit comments on the Packwood area development plans & proposals.

We have been homeowners in Timberline since 2006. We have observed the transformations as a result of STR's. Some good and some bad. We use our cabin as a STR and own our responsibility in supporting the necessary changes so that our Packwood community serves all residents and visitors.

Below are my comments and questions:

1. CAP on Number of Rentals should vary by association. The 25% cap on STRs in downtown Packwood makes sense to me as this is where many service workers and long term primary residents reside. I like the idea of a cap in outside associations as well as it will reduce burden on water, waste, etc and maintain a better balance of owners and guests. However I don't agree with a flat 25% cap across all areas. Caps need to take into account differences in residence demographics, home size & value, amenities available, homeowner associations, etc. Homes in outside of town communities, such as Timberline, have historically been 2nd/vacation homes. Since I have lived here I estimate less than 10% of homes in Timberline were permanent residents. I would like to understand how the flat 25% was derived and what the objectives are for associations like Timberline? I agree a cap should be in place but 25% for Timberline seems low given this has always been more of a vacation association. I would suggest 35%. NOTE: I do not believe the cap will transform former Timberline STR's into long term rentals for service workers because of my above point, owners like to use the homes. Those who can afford to will revert back to not renting, and those who bought for the purpose of renting, or need to due to higher taxes, will sell to others who will also use for their own vacation home.

2. Lottery system will cause significant turbulence and financial disruption every year to the STR market. A yearly lottery eliminates the ability for home owners to budget as there is no guarantee of annual income. This is not sustainable for any STR owner, in any locale. The luck of the draw creates the potential of financial ruin, specifically for existing STR owners that rely on STR income to pay taxes and mortgage.

3. IF permits are required I strongly suggest 2 approaches:

a. Existing STR's owners are granted "first right of refusal" in the annual permitting process. Given the % of existing STR's (specifically in Timberline) are under the proposed 25% threshold there is no reason or value in putting these owners at risk of unpredictable financial burden or worse, losing their homes because they couldn't get a permit.

b. For the remaining permits I recommend a "First Come First Serve" process. This allows owners/new buyers to incorporate the risk of not getting a permit into the purchase of a home or transitioning their existing home into a STR.

I hope you find my recommendations of value. I am available for further discussion if desired. I know your job is difficult and I applaud your invitation for public comment.

--

Lisa Lauer
408-315-6642
lisamlauer@gmail.com

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From: [Jerry Lowdermilk](#)
To: [Mindy Brooks](#)
Cc: [Sean Swope](#); [Lindsey Pollock](#); [Scott Brummer](#)
Subject: Lewis County STR Regulations Public Input
Date: Thursday, July 3, 2025 8:50:09 AM
Attachments: [Final Revised STR Regulations.docx](#)

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To whom it may concern,

My name is Jerry Lowdermilk, and I am writing you to provide my thoughts and concerns with the recently proposed short- term rental regulations for Lewis County.

I can remember as early as 10 years old listening to my parents visiting with their friends and inevitably at some point in the conversation someone would say, "I sure wish I would have held onto that place." After hearing that enough times, I made a commitment to myself, even at that age, that I was going to hold onto my properties when I become an adult. I have worked extremely hard for the last 30+ years to do just that and acquire rental properties. I have invested a tremendous amount of time, energy, and money, and made a long list of sacrifices. Over the years I have owned as many as 7 and as few as 2 long term rental properties across Pierce and King County with the ultimate goal of being able to maintain a reasonable income when I retired. Approximately 7 years ago I purchased a small cabin in Packwood. I had no intentions of using it as a rental. I bought it for a getaway for my kids and I. It was intended to be, and has been, a place to bond, make memories, and enjoy all of the outdoor activities the PNW has to offer. We didn't even have WiFi or a TV for the first 4 years we had it. Eventually it became obvious that I was missing an opportunity to utilize the cabin as a short-term rental when we weren't using it. With the kids activities, my work, and all of the other demands of everyday life, we were only using it for 4 – 5 weeks out of the year. So, for the past 5 years I have settled on 2 long term rentals in Pierce County and a short-term rental in Packwood as my "retirement" portfolio, even though I'm not completely retired yet.

Why do I share all of that with you? I believe that, at the end of the day, we are all humans and are all basically working towards similar goals. While we each have our own way of getting there, we want to get to a point of stability and comfort that allows us to focus on our time with family and friends. My parents were very poor; to the extent that my new clothes for school were hand me downs from my cousins, and I was thrilled to have them. Everything I have, which isn't much to most, came from my own effort. And while it's certainly not perfect (I am in the red with my cabin every year), I have been able to acquire the properties I want and begin to develop them for future income like I committed to doing when I was 10 years old.

But now, to be completely honest, these newly proposed short-term rental regulations terrify me. They are going to put everything I've sacrificed for the last 30 years at risk, and I simply can't wrap my head around the "why". Over the last three decades I have worked in professional environments leading various teams and projects. I have always welcomed critical feedback because I know I don't have all of the answers, and as long as the feedback is coming from a place of good intentions and is delivered respectfully, it will likely help me grow. All of my feedback on these regulations is critical, but I hope you will receive it with the same mindset. I am not commenting about any of you as people. I am simply providing feedback with what I believe to be gaps and substantial opportunities with the proposal. But what I feel is also important to note is that I'm not just being critical. I'm also trying to provide options and potential solutions. So, the remainder of this email will focus on what I believe needs to be addressed.

The lack of data and analysis and a cogent explanation of how the regulations would have a positive impact on the individuals and communities and how they would solve the stated issues is very frustrating. I want to make it clear that this kind of "throw it at the wall and see if it sticks" approach is irresponsible and minimizes, if not completely ignores, the risk and negative impact to the lives and livelihoods of the people and communities they will affect.

For the sake of brevity, I will attempt to bullet point the majority of my concerns with a quick explanation.

<!--[if !supportLists]-->1. <!--[endif]-->How were owners and non- owners in the affected areas notified of these proposed regulations? I know that I'm not alone when I say that I found out about the proposed regulations by luck. The property management company that I use for my cabin forwarded an email at the end of April to all of their owners from an owner that was organizing legal action against the assessor for unfairly assessing short- term rental properties (separate issue, but yes, this is coming). Around the middle of June, someone in that thread just happened to ask if everyone was aware of the newly proposed STR regulations. This was the first I had ever heard of it. This was only two and a half weeks ago. Is that really enough notice for people to have time to digest and understand the potential impact while managing their busy day to day lives? I attended the meeting in Packwood on June 23rd, but I walked away with even more questions than I had prior to the meeting. There simply isn't any data or analysis to support what is being said. I didn't receive any notification from the county, but Mindy said they had a list of STR's so it seems like direct communication would have been pretty easy. Whether intended or not, this makes it feel like the county doesn't really care right out of the gate.

<!--[if !supportLists]-->2. <!--[endif]-->Why the rush? Why does this need to be implemented this year? Due diligence hasn't been done. Where is the "Impact Statement" with data to support the proposed path forward? There's little to no data to support these regulations or suggest the regulations will solve the problems that have been called out, such as affordable housing and local disturbances.

<!--[if !supportLists]-->a. <!--[endif]-->Have you truly identified all of the major stakeholders and how they will be affected? Many Packwood residents are using STR's to live because there aren't a lot of other jobs available – housekeepers, landscaping contractors, plumbers, general contractors, handyman contractors, property management employees, etc.... Local businesses depend heavily on the visitors that stay at the STR's. Many STR owners supplement their income or live off the income if they are fortunate enough to have developed those assets.

<!--[if !supportLists]-->b. <!--[endif]-->The Commission claims this is about affordability, but you can't regulate your way into a more affordable market by capping use and restricting what can be built. That's how you freeze supply and freeze out future residents and small builders in the process. If the Commission truly wants to promote affordability, they should look at who's buying the homes, not just how they're being used. Focus on limiting large-scale corporate ownership, not micromanaging families trying to add an ADU or build a future here. Copying big government rules from big cities won't fix Packwood. It will just stall the fragile momentum we've fought hard to build.

c. <!--[endif]-->What about a phased approach? Implement the zoning and basic health and safety requirements this year and hold on everything else while you do your due diligence to understand the impact of your proposal - see how the zoning impacts development and real estate prices and use that as a leading indicator for how to proceed in coming years. Leverage STR owners to help build a path. We are very incentivized for Packwood to thrive. And personally, I love Packwood!

3. <!--[endif]-->How many STR owners are full- time residents? It has been implied that all of the STR owners are outsiders, and because of that, only care about themselves. That simply isn't accurate. At the June 23rd meeting Mindy asked for full time residents to raise their hands and well over 50% of the room raised their hand. Then she asked for STR owners to raise their hands and nearly the same amount of people raised their hands. The group that I have been working with on this has nearly 50 owners in it and at least half of them live in Packwood full time, and none of them see these regulations as the right way to proceed to support the future growth and development of Packwood.

4. <!--[endif]-->The county should embrace the owners. We aren't the enemies. We are heavily incentivized for our communities to thrive so they continue to be a desirable destination for people. We are just as invested in the well- being of the community as long- term residents, if not more, in some cases. Leverage us to help build the path. Stop ostracizing us. As many people have mentioned, like it or not, much of the growth many of these communities have experienced is due to STR's. That's not a complex statement or concept. Implementing these regulations without due diligence and data to support

them sends a strong message that the community and individuals affected be damned.

5. <!--[endif]-->On the whole, STR owners have the best kept properties. There may be a few exceptions, but it's in our best interests to have well maintained, healthy, clean and safe properties or they won't rent. I am not opposed to basic safety regulations like smoke/ carbon dioxide detectors and fire extinguishers etc...., but a large portion of the remaining regulations are unfounded and unsupported. There is also a significant opportunity to work with the property management company(s) and HOA's to have them implement health, safety, and outside property maintenance regulations, including trash, yard work, and upkeep. This is what HOA's and property management companies are for.

6. <!--[endif]-->The people that need housing can't afford the homes that are currently available so this doesn't solve the problem of affordable homes. There are currently well over 100 properties for sale across just Randle, Ashford, and Packwood. If a true housing crisis existed there would not be this many homes/ properties for sale. My point is that even if some STR owners were forced to sell their properties due to these regulations, the people needing housing still wouldn't be able to afford them because they can't afford what is currently available. At the end of the day, the proposed regulations simply will not improve affordable housing. The lack of affordable housing is not unique to Lewis County. It's a state/ national problem so it has nothing to do with STR's. I have 3 young adult children that are gainfully employed in Pierce County that cannot afford to buy their first home. Affordable housing and STR's are two completely separate topics. As a final point on this, it would be good to know what the housing shortfall is estimated to be now and in 5 years, 10 years etc...? I understand that an analysis has been done, but why hasn't it been shared as part of the communication and meetings that have been held? Why is it on the STR owners to go find that information and try to interpret it. Again, if the due diligence was done, that data should be provided as part of the supporting justification for limiting STR's. That hasn't happened so again, it seems STR owners and other impacted stakeholders just be damned. Can someone show that converting significant STR inventory and eliminating all future STR's satisfies the projected shortfall in 5 years? This should exist if it's true or even close to being true.

7. <!--[endif]-->In regards to the approximate 300% increase in property values in Packwood since 2011, the question is how far below the average price was Packwood when the time period started? The 300% isn't an accurate reference if the Packwood market was substantially more depressed than the comparative areas that were mentioned during the same timeframe. Where is that data?

8. <!--[endif]-->Packwood is a gold mine with unlimited potential if the commission and the powers that be have the capacity to understand the issues and make the right decisions to use that potential to truly grow the community in a positive way.

9. <!--[endif]-->If permits are required, current STR's need to be grandfathered and permits should be transferable upon sale. There should be absolutely no caps on STR's beyond potentially limiting the total number owned by an individual.

<!--[if !supportLists]-->10. <!--[endif]-->I am very concerned about the requirement to post contact information **outside** the property. It's like putting up a neon light to thieves and bad actors. "Hey, this house is an easy target when no one is here! Come rob me!". If there are issues, that is what HOA's, neighbors, and sheriffs are for. The county should not be getting this far into the weeds. I don't believe you have fully considered the risk of this request.

<!--[if !supportLists]-->11. <!--[endif]-->I'm absolutely opposed to being required to have a permit without even so much as an estimate for what it would cost. At the risk of being blunt, it's simply ridiculous. How many permits, and permit processes, does Lewis County currently have that could have been used as a model to at least give us a ball park figure for what these permits are going to cost. Could you have looked at other counties to get an estimate? Are we talking 50 bucks or 1000 bucks every year? It's completely unreasonable, and even disrespectful, to say it's going to be required and not offer an estimate. I don't agree for a contractor to do work for me without an estimate. I don't buy a new vehicle without a proposed price. It's not how things are done respectfully when the proper due diligence has been conducted.

I have attached for reference a revised version of the proposed STR regulations. I hope you will take my

comments and the revised version and make some significant changes. Thank you for the opportunity to provide input.

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Chapter 17.105 Short-Term Rentals

17.105.010 Purpose

The purpose of this chapter is to ensure that short-term rentals are not having a significant impact on residential housing supply in Lewis County and are operated in a manner that protects public health and safety, while also encouraging the economic benefits of tourism.

17.105.020 Applicability

This chapter applies to dwelling units or portions thereof that meet the definition of “short-term rental” in section 17.10.190.

17.105.030 Allowance of short-term rentals

Short-term rentals are allowed as described in Chapter 17.42 with the following limitations:

- (1) No person, household, business entity, or beneficial ownership group may own more than 10 short-term rentals within Lewis County. A short-term rental is considered “owned” if the individual or entity holds title to the property, either directly or indirectly through affiliates, subsidiaries, trusts, or shell companies.
- (2) This ownership limitation does not apply to third-party property management companies that operate short-term rentals on behalf of property owners, provided that the management company does not retain ownership or controlling financial interest in more than 10 properties.
- (3) Each STR permit application shall include disclosure of all STRs owned within the county by the applicant or affiliated entities.
- (4) The County may establish procedures to audit permit holders for compliance with this ownership limitation.
- (5) Multifamily housing may not be provided as short-term rental, except if requirements of 17.17.210(1) have been met.

- (6) ~~Within Urban Growth Area – Small Towns, pursuant to Chapter 17.17 LLC, and Type I LAMIRDS, which is land designated Small Town Mixed Use (STMU), Rural Residential Center (RRC) or Commercial Crossroads (CC) on the official zoning map, no more than 25% of the total existing dwelling units within each separate urban growth area or Type I LAMIRD may be provided as short term rental.~~
 - (7) ~~Where there is a primary dwelling unit and one (1) accessory dwelling unit on a single parcel, only one (1) dwelling may be provided as short-term rental. Where there is a primary dwelling unit and two (2) accessory dwelling units on a single parcel, only two (2) dwellings may be provided as short-term rental. Where there is a primary dwelling unit and one (1) accessory dwelling unit on a single parcel, only one (1) dwelling may be provided as short-term rental. Where there is a primary dwelling unit and two (2) accessory dwelling units on a single parcel, only two (2) dwellings may be provided as short-term rental.~~
 - (8) ~~Short-term rentals shall not be operated outdoors, such as a tent or treehouse, except as allowed in an RV park or campground.~~
 - (9) ~~Recreational vehicles or yurts shall not be provided as short-term rentals except those that are permitted as a residence or as allowed in an RV park or campground.~~
 - (10) ~~Short-term rentals shall not be used for commercial events, such as a wedding venue.~~
-

17.105.040 Standards

- (1) The owner or legal representative shall obtain a short-term rental permit from Lewis County Department of Community Development. Permits shall be renewed annually.
- (2) ~~The short-term rental shall obtain a building permit as a residence, pursuant to Title 15 LLC.~~
- (3) The maximum occupancy shall be no more than two (2) guests per bedroom plus three (3) additional guests. The number of bedrooms is determined by the approved building permit for the structure. A guest is a person over two (2) years of age.
- (4) A minimum of one on-site parking space per bedroom shall be provided.
- (5) The property address shall be posted so it is clearly visible from the road.

- (6) ~~The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible. from the road. Local means within Lewis County.~~
- (7) Solid waste shall be stored in completely enclosed and secured receptacles. ~~and shall be stored indoors.~~
- (8) A sign shall be posted conspicuously inside the short-term rental with the following information:
- a) The unified business identification number and the Lewis County short-term rental permit number.
 - b) Name, address and phone number of the property owner and agent(s) authorized to act on the property owner's behalf.
 - c) A map of the property boundary, indicating access points, adjacent private property or common areas, and any easements, including access easements to shorelines.
 - d) A floor plan indicating location of fire extinguishers and all exits.
 - e) Instructions regarding waste collection and removal.
 - f) Posted quiet times starting no later than 10:00PM and ending no earlier than 7:00AM.
 - g) The statement "Occupants shall follow all local burn restrictions."
-

17.105.50 Permit issuance

- (1) The short-term rental permit shall be processed as a Type I application.
- a) All ~~existing~~ short-term rental owners ~~that obtain a permit~~ prior to December 31, 2025 shall be ~~vested grandfathered. These short-term rental owners that meet 17.105.030 and 17.105.040. will be granted permits and will not be~~ subject to the limitations of the ownership cap, unless the permit is revoked or relinquished.
 - b) After January 1, 2026, new short term rental permits shall be issued ~~on a first come, first served basis. to new short-term rentals that meet 17.105.030 and 17.105.040.~~
- (2) To obtain a permit, the property owner or agent authorized to act on the property owner's behalf shall demonstrate that all of the following are met:

- c) The standards listed in subsection 17.105.040.
- d) There are working smoke and carbon monoxide detectors and properly maintained and charged fire extinguisher on the premises.
- e) There is a permitted and properly functioning septic system or sewer connection.
- f) There is solid waste collection during all months the dwelling unit or portion thereof is provided as short-term rental.

~~g) Proof of paid taxes and fees associated with the property.~~

- h) Valid liability insurance ~~of one million dollars or more~~ that covers the use of the short-term rental unit as required by RCW 64.37.050.

- (3) Any short-term rental permit shall be renewed annually based on the permit issuance date. Failure to renew a permit within six (6) months of the permit renewal deadline shall result in automatic revocation of the permit.
- (4) Any permit issued pursuant to this section is transferable; transfer of permit to a different owner shall happen at the time of sale as long as the new owner meets requirements in 17.105.030 and 17.105.040.
- (5) A property owner may voluntarily relinquish a short-term rental permit upon written 30-day notice to the Lewis County Department of Community Development and shall cease all short-term rental operations on the subject property following affirmation of the permit revocation from the County.
- (6) Permit applications shall include an affidavit attesting that the applicant does not exceed the 10-property ownership limit countywide. The county may revoke permits where this affidavit is found to be false.
- (7) Permit holders found to exceed the ownership limit shall have all permits suspended and be ineligible for new permits for 3 years.
- (8) Failure to obtain and maintain a short-term rental permit, including meeting the standards of subsection 17.105.040 and 17.105.050, shall be processed as a code violation pursuant to Chapter 1.20.

To: The Lewis County Planning Commission

From: Rob Maricle -Packwood Community Action Plan Member

Subject: Short-Term Rental Regulations

As a member of the Packwood Community Action Committee (CAC), I was very surprised to see the extent to which your committee expanded the regulations for Short-Term Rentals (STRs) that were originally drafted by the CAC. I take issue with this governmental over-reach after spending many hours to help draft the regulations specific to the Packwood Subarea Plan.

STRs in Packwood and the surrounding areas of Goat Rocks, Timberline and Goat Rocks are key components of the local recreational economy. They provide service jobs locally and much-needed temporary living arrangements for visitors to Mt. Rainier National Park and the White Pass Ski area. The economic impact of having STRs to support the recreation-based economy is obvious if one just observes the business expansion in Packwood itself.

The CAC spent a considerable amount of time creating regulations to maintain Packwood's small-town appearance. This included restrictions on the types of STRs within the Subarea Plan but NOT with the overall goal to limit the number of them. Further, the members were told multiple times that the regulations developed were specifically to the Packwood Subarea Plan Zone and would not be used to expand out into High Valley, Goat Rocks, and Timberline areas let alone to other targeted areas of Lewis County.

Therefore, here are the items of the new regulations that are cause for concern:

17.105.010- "The purpose of this chapter is ensure that short-terms rentals are not having a significant impact on residential housing supply in Lewis County...."

Input: How will "significant impact" be evaluated? Please list specific criteria that defines "significant impact" prior to adopting these rules. As written, it is left open to interpretation and abuse by unelected officials to the detriment of STR owners.

17.105.105.030-

(1) "...., no more than 25% of the total easing dwelling units within each separate urban growth area of Type 1 LAMIRD may be provide as short term rental...."

Concern: Where did this cap on STRs come from? There has been ZERO economic impact on areas that depend on STRs for their local economy's health to justify this across-the-board application of a limit. Furthermore, there is no clarification within the proposed regulations on who gets to determine which landowners get permitted every year, thus putting their investment property at risk of zero income. If the limit has been obtained, the investment property will sit idle and much cost to the owner.

- (2) "Where there are up to two (2) dwelling units on a single parcel, no more than one (1) dwelling may be provided as a short-term rental".

Comment: This needs to be stripped out or "grandfather exceptions" written into this regulation. There are people who have already built new properties that have adjoining units and up to three (3) units on a parcel. This is absolutely unfair to them to take away their ability to recover their investment and to impact their standard of living based on that projected income being taken away from them.

- (6) "Short-term rentals shall not be used for commercial events, such as a wedding venue"

Comment: Why was this inserted? There are large STR properties in Packwood that are used for weddings currently. Furthermore, are there the same regulations put forward for Single Family Residences? Why are you singling out STRs in this matter? Please provide quantifiable data that shows hosting a wedding at an STR is a higher risk to the community than one hosted at a Single Family residence.

17.105.040

- (6) "The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road. Local means within Lewis County"

Input: This needs to be eliminated. It is a clear violation of privacy of the homeowner. Also, if the home is not occupied, the home is subject to criminal activity and could even become a target for "squatters". AirBNB, VRBO, and Bookings.com all have this information for the property. It's a simple telephone call to those services regarding any complaints, and the owner is immediately contacted.

17.105.050

(1) (a)” All short-term rental owners that obtain a permit prior to December 31, 2025 shall be vested and not subject to the limitations of 17.105.030(1), unless the permit is revoked or relinquished.”

Input:

1. Does this mean that the permit does not fall under the 25% cap limit just for 2026 or in perpetuity? This needs to be clarified.
2. If it is only for 2026, then the owner is on the “first come, first served basis” as of January 2027 and is not guaranteed he will be able to do business as an STR year over year. Again, this is unfair to those who have already invested their own assets into building and maintaining STRs presently.

(2) (b))”There is a permitted and properly functioning septic system, sewer connection or other legally permitted wastewater treatment system....”

Input: How will this be determined and by who? This fails the “smell test” (no pun intended) regarding how the homeowner will be required to comply. This is a regulation that will quickly be expanded due to supposed “lack of compliance” by a few thus requiring all people have periodic inspections by the County at homeowner cost.

(2) (c)” There is an approved water source that meets minimum potable water standards “

Input: As with the septic (above), how will this be verified? And once again, with the owner saddled with the cost?

(3) “Any permit issued pursuant to this section is non-transferable; transfer of property to a different owner shall require application for a new short-term rental permit”

Input: This needs to be eliminated.

1. Estate Planning- This is a direct assault on one’s ability to pass along generational wealth to the next generation. Not allowing the permit to pass through as part of the Estate transfer subjects the inheritor to potentially lose value on the property due to the property being outside the capped limits in the area in which it resides.
2. Investment Planning- by not allowing the permit to transfer with the property, this will impact the value of the property if sold. According to the Lewis County Assessor, STR properties are more valuable as STRs than if

they were Single Family Residences. Thus, by not allowing the STR to remain an STR (due to lack of availability of permits) the County effectively reduces the value of the property.

“Commentary Page” on 17.105.050

(4) “If a property owner no longer wishes to offer their dwelling as a short-term rental, they may request that the permit be revoked. The County will revoke the permit and provide documentation to the property owner which they may use for tax purposes.”

Input: “...may use for tax purposes”. What does this mean? It implies that the STR will no longer be considered an STR by the Assessor’s office and the assessment will be adjusted accordingly. Has the Assessor agreed to the immediate reclassification or, will people still be assessed as an STR even though they are not legally one?

A regulation that needs to be added to prevent unelected bureaucrats adding to these regulations without due process:

“These regulations cannot be added to or modified in any manner without all items below being completed by the County:

1. That any change is subject to the vote of the Board of County Commissioners prior to its implementation.
2. A full economic impact statement caused by the proposed change and that statement being submitted to all STR owners within Lewis County prior to ratification by the Board of County Commissioners.
3. Documented Proof that any proposed change will improve the residential housing supply in Lewis County. This too shall be submitted to all STR owners within Lewis County prior to ratification by the Board of County Commissioners.
4. That any change to these regulations must be presented in public forums within impacted UGA’s and LAMIRDs in Lewis County prior to approval of the change by the Board of County Commissioners.

Robert Maricle

Packwood, WA

Wayne & Laura Parker
PO Box 978
Chehalis, WA 98532
parkerpackwoodproperties@gmail.com
425-766-0421
July 3, 2025

Lewis County Planning Commission
Community Development Department
125 NW Chehalis Ave
Chehalis, WA 98532

RE: Proposed Short-Term Rental Regulations (LCC 17.105) – Personal Testimony & Request for Reconsideration

Dear Members of the Lewis County Planning Commission,

We are the owners of a short-term rental property in Lewis County, and we are writing to express our deep concerns about the proposed short-term rental (STR) regulations outlined in Chapter 17.105. While we understand the importance of thoughtful planning and preserving community values, many of the current proposals — particularly the arbitrary 25% cap, annual permit lottery, non-transferability of permits, and excessive operating requirements — threaten not only our livelihood but also the significant financial and emotional investment we've made in this community.

This is deeply personal for us.

We have poured time, money, and care into our property. We've invested in meaningful upgrades — adding a hot tub, building a new deck and outdoor area, and replacing and refreshing many of the interior furnishings to ensure our guests have a top-tier experience. We've also taken the business side seriously: we are properly licensed in the State of Washington and fully compliant with all tax collection, reporting, and filing requirements. On top of that, Laura participated in a 6-month professional STR mentorship program — an expensive but incredibly valuable commitment that helps us provide outstanding hospitality.

And the proof is in the results. We maintain a 5-star review rating. We've worked hard to build that reputation, one guest at a time.

One thing the Commission needs to understand is that **when you buy a home to use as a short-term rental, you are not buying a business — you are building one from the**

ground up. Platforms like Airbnb and VRBO do not allow listing transfers. If we were forced to start over under a new permit system, or lost our permit entirely due to an arbitrary cap or lottery, it would mean wiping out the trust and visibility we've built. For us, having purchased our home in November, this would be devastating — and for others who have operated for years, it would be even worse.

We made big financial decisions based on the understanding that short-term rentals were legal and supported in Lewis County. We specifically purchased our home as an investment property, and our mortgage is based on it being used as a short-term rental. In fact, under IRS rules, to maintain this as an investment property we are not allowed to use it for more than 14 days per year. If our ability to rent is restricted or lost, it jeopardizes our mortgage compliance, our tax status, and the entire financial stability of our family. At no point during our purchase were we told this could be taken away. To change the rules now, without grandfathering in responsible operators, is not only unfair but would cause real economic harm to families who depend on rental income to make these homes viable.

What's been harder to quantify — but equally important — is the emotional toll this is taking on us and many others. The stress and anxiety this uncertainty has caused is enormous. We've invested so much time, money, and heart into making our rental special, and now we live with the constant fear that everything we've built could disappear overnight. We're losing sleep. We're worried about our future. And we're not alone — many other local STR owners feel the same way.

It also feels like short-term rentals are under attack from every direction. The county assessor already assesses STRs at higher property values than comparable residential homes, so we're paying higher property taxes than our neighbors. If the county is going to tax these homes at a higher commercial or income-generating value, then it makes sense that the permit to operate should transfer with the property to help maintain that value. Otherwise, the value they are taxing us on is wiped out overnight — and that's fundamentally unfair. Meanwhile, the state recently tried to pass legislation to add an additional 4% tax on STRs. We pay the same B&O taxes that other small businesses pay. We pay taxes on personal property used in our business. Now, the county wants to charge us annual permit fees and add layers of restrictive new requirements. **When does it end?** Responsible, compliant owners like us are being squeezed from every side, while we provide jobs, support the local tourism economy, and bring valuable dollars into Lewis County.

We also have serious concerns about some of the specific standards being proposed. For example, requiring STR owners to post signs with personal contact information for the owner or local property manager that can be clearly read from the road raises real privacy

and security risks. This essentially advertises that these homes are vacant much of the time, making them easy targets for criminals. We want to keep our guests safe, our property secure, and our families' personal information private. Rules like this feel more punitive than protective.

It's also critical to recognize just how vital short-term rentals are to our entire tourism economy. Packwood, White Pass, Mt. Rainier, and the surrounding areas are known for outdoor recreation and year-round tourism. STRs make it possible for thousands of visitors to stay here when hotels or motels simply don't exist, don't meet demand, or just don't offer the kind of quality and experience today's travelers expect. Local restaurants, shops, guides, and countless other small businesses **depend on the steady stream of guests** that STRs bring. Restricting STRs so heavily — or creating uncertainty about whether they can even exist next year — risks choking off this vital tourism lifeline. Where will these visitors go instead? If we push them away, the real cost will be lost revenue, lost jobs, and businesses that can't survive the shoulder seasons.

And it's not just our guests and the tourism businesses they support — it's all the local jobs that STRs help create and sustain. Many homeowners like us rely on local housekeepers, property managers, handymen, snow removal services, landscapers, hot tub maintenance crews, and countless other small service providers. This steady, year-round work allows these folks to live and work in our community. If short-term rentals are cut off or thrown into annual uncertainty, it's these local jobs that will disappear first — with no plan in place to replace that lost income.

We also want to be clear that these homes are vacation homes — often in remote areas or resort-style neighborhoods — that were never intended or priced to be affordable workforce housing. These homes are simply too expensive for most local residents to buy or rent long-term, and the idea that capping or removing STRs will magically turn them into affordable housing is unrealistic. If anything, we'd end up with vacant second homes that sit empty for much of the year, doing nothing to help the community and harming local tourism at the same time.

Finally, we want to address the lack of meaningful outreach in this process so far. The county has the contact information for all current STR owners. So why were no direct notices mailed to those most directly affected? Instead, many of us only learned about these sweeping proposals by chance — through word of mouth, social media, or concerned neighbors. That is not how fair, transparent local government should work. Those of us whose livelihoods and family finances stand to be upended should be notified directly, not left to stumble across life-changing information online.

We respectfully urge you to:

- **Slow down this process** and bring actual STR stakeholders to the table.
- **Base decisions on real, local data**, not arbitrary limits.
- **Grandfather in all current, compliant operators**, so that families who invested in good faith are not punished.
- **Remove the arbitrary 25% cap**, which is not based on meaningful local housing data. Lifting this cap will increase the number of available rentals, support higher tourism numbers, attract more visitor spending, encourage new businesses to open, and create more local jobs — all of which directly benefit Lewis County's economy.
- **Allow permits to transfer with the property**, to protect the very value the county already taxes us on.
- **Reject the idea of an annual permit lottery**, which only creates damaging uncertainty.
- **Reconsider impractical and unsafe requirements**, like forced signage of personal information.
- **Commit to real, direct communication** with those most impacted.

We love this community and want to continue contributing to its success. Please don't penalize the very people who have done everything right to run a safe, legal, and welcoming business. Let's find a balanced path forward — one that protects neighborhood character without destroying small businesses and the local jobs and revenue that come with them.

Thank you for your time, your service, and your consideration.

Sincerely,

Wayne & Laura Parker

Lewis County STR Owners

From: [Andy Starr](#)
To: [Mindy Brooks](#)
Cc: [Sarah Starr](#)
Subject: Written Testimony Regarding Proposed STR Regulations - Starr
Date: Thursday, July 3, 2025 10:20:01 AM

You don't often get email from arstarr91@gmail.com. [Learn why this is important](#)

Dear Mindy Brooks and the Planning Commission,

We are writing to provide public comment and share our perspective on the proposed regulations for short-term rentals in Lewis County, specifically in Packwood. We'd like to offer some background on who we are, how the proposed regulations will impact us and homeowners in similar situations, and express concern about the lack of evidence supporting these new rules.

My wife and I have a deep connection to this area. Sarah grew up in Adna and we both have been skiing at White Pass since elementary school. Packwood is our favorite outdoor destination—whether skiing at White Pass, hiking around Mt Rainier, or fishing in the mountain creeks and lakes. This is a place we hold in high regard and we cherish the opportunity to build a home here. In 2019 we purchased a vacant lot in Packwood with the goal of building a cabin. Since purchasing that lot, we've spent 6 years saving and planning for our build. We are finally ready to start construction this summer. We are in our mid-30s and not yet in a position to live here full-time due to work commitments. My wife works as a nurse and I am working in the brewing industry. Since we can't be up there full time yet, renting our cabin through VRBO or Airbnb is a major part of our plan to help cover costs and build for our future.

Our concern is that the proposed regulations, including the cap on short-term rental permits and the permitting process, will severely impact us and many other homeowners in similar circumstances. Given the proposed 25% cap on short-term rentals is supposed to begin January 1, 2026, our construction timeline means we would likely miss the opportunity to get a permit as our home will not be completed until spring 2026. Additionally, the ambiguity surrounding the permitting process raises many questions: Are new permits required every year? Is the process first-come, first-served? Will there be a lottery? And what happens if you don't get a permit but are relying on rental income?

Furthermore, it is frustrating to see these regulations being pushed through so quickly without sufficient evidence or consideration of their impact. While we acknowledge the importance of addressing affordable housing, we do not believe these regulations will create more housing opportunities. Instead, they could reduce lodging for visitors and leave more homes vacant.

There has been no data or research presented to show that these regulations will have any positive effect on housing costs. At the June 23rd Town Hall, it was clear these proposals are not backed by studies or solid evidence. We find the following points particularly troubling:

- The 25% cap appears arbitrary and lacks supporting research or data.
- No studies have been provided to show that limiting short-term rentals will reduce housing costs in the region.
- There is no plan for how the fees collected from homeowners will be allocated—whether for permitting or additional inspections.
- If property values drop as a result of these regulations, will it truly make them more affordable for locals, or will wealthier individuals simply hold onto second homes they can afford to keep vacant when not being used?

While Lewis County has rightly recognized the need for affordable housing, the proposed solution lacks any evidence it will effectively address this issue. Instead, these regulations will negatively affect homeowners' livelihoods and their ability to make full use of their property. We believe that if regulations are to be introduced with such significant consequences, they should be backed by studies demonstrating how they will actually achieve the intended goal of reducing housing costs.

We also question whether individual homeowners should be restricted in how they can use their property. We worked hard to be in a position to build a home in Packwood, and now the county is proposing new regulations that could limit our ability to utilize that property.

Rather than imposing restrictions on individual homeowners, we urge the county to explore higher-density housing options like condos or apartments, which would help increase the supply of homes and create more affordable options. The new Urban Growth Area Zoning could help make these options possible, and incentivizing developers to include higher-density units as part of their projects would be a more effective approach. Has the county explored this?

The local economy also stands to be significantly impacted by these regulations. Packwood, with its proximity to Mt. Rainier and White Pass, attracts visitors from all

over the world. Hotels are limited, and short-term rentals offer a unique experience many visitors seek. Reducing these options could hurt local businesses like Packwood Brewing, Blanton's, Packwood Sports Hut and other businesses who rely on visitors. With fewer visitors and less money circulating in the community, there would be fewer jobs, lower tax revenue, and no guarantee that affordable housing would be addressed.

We respectfully request the county planning commission pause and re-evaluate these proposed regulations. The current approach is hasty, lacks supporting evidence, and places unnecessary burdens on homeowners. For those of us currently building or planning to build, these regulations could prevent us from renting our homes and negatively affect our long-term financial stability.

Thank you for your time and consideration. We look forward to hearing your thoughts and hope you'll take these concerns into account.

Sincerely,

Andy and Sarah Starr
144 Bugle Lane
Packwood, WA 98361

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From: [Nathaniel Nyberg](#)
To: [Mindy Brooks](#)
Subject: UGA - Small Towns and Short Term Rentals Testimony
Date: Thursday, July 3, 2025 3:41:31 PM

Hi Mindy,

My name is Nathaniel Nyberg, and I'm a property owner in Packwood. I'm writing to express my opposition to the proposed short-term rental (STR) restrictions, and to advocate for a more balanced, evidence-based approach.

I understand and respect the county's interest in regulating STRs. Thoughtful regulation can benefit communities. However, the current proposal feels overly broad and risks doing more harm than good—not just to owners like me, but to the broader community and economy.

I purchased 943 Cannon Road on May 21st of this year. It's a single permitted residence on 10 acres that was previously operating as an Airbnb. It is extremely important to me that I do not remove housing supply from the community. My original plan was to subdivide the parcel and build 3–4 more homes. These would have been responsibly operated short-term rentals, adding much-needed housing supply and supporting the local economy.

But under the proposed rules, this plan no longer seems viable.

Packwood does not have a strong medium- or long-term rental market. Without the option of STRs, there's no realistic return on building—even though I already own the land. The risk is simply too high.

I'm deeply concerned that these regulations will have the opposite of their intended effect. They will discourage new housing, depress property values, reduce tax revenue, and harm the local economy by cutting off tourism spending and eliminating local jobs in property cleaning, maintenance, and management. I struggle to see how that benefits the town or the people who live here.

On a personal level, I've invested my entire life's savings into this project. I chose Packwood after carefully evaluating multiple counties across Washington. I saw a beautiful, vibrant community experiencing thoughtful growth, supported by a county government that welcomed investment.

Now, I fear that this investment could lead to financial ruin.

I expect to lose roughly \$100,000 this year between transaction costs, improvements to the property, and rental losses. My original plan was to absorb those short-term losses while building new units to offer as rentals. These new regulations take that path away entirely.

This isn't just about me. My parents are both disabled veterans without sufficient income or savings for retirement. I had hoped to use this investment as a way to support them financially while contributing positively to the Packwood community. These regulations threaten that vision entirely.

I respectfully ask that you amend the proposed regulations to avoid curtailing responsible new

investment—and to protect existing property owners from devastating financial consequences. I urge you to reconsider the rental caps and to create a clear path for new construction to be permitted for STR use.

For example, perhaps properties that are otherwise sitting empty—due to a lack of long-term tenants—could be eligible for STR permits. Or perhaps, allow for newly constructed homes to be open for permitting as well. Let's make sure new housing can be built and used effectively, rather than sitting vacant.

Finally, I want to say that not all regulation is bad. I support efforts to ensure STRs are responsibly operated. Reasonable rules around waste management, occupancy limits, signage, and contact transparency make sense. A permitting system that ensures compliance is entirely appropriate.

But please—remove the caps. Create space for growth. Don't close the door on people trying to invest responsibly in Packwood's future.

Thank you so much for your time and consideration.

Sincerely,
Nathaniel Nyberg

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From: [jane palmer](#)
To: [Mindy Brooks](#)
Subject: Packwood short term rentals
Date: Thursday, July 3, 2025 12:31:11 PM

You don't often get email from palmerjane221@gmail.com. [Learn why this is important](#)

Over the past years, I have been a frequent visitor to the Packwood. I am attracted to the area for it's natural beauty, location to Mt Rainier and that the drive from my home in Kitsap County is manageable.

I am considering buying land and building in the High Valley area of Packwood.

To make this financially feasible, I am needing to make the property into a short term rental.

I understand that the County is considering whether to limit and impose many restrictions on STRs, both existing and new. This the reason for my writing to you .

Packwood, much like Leavenworth, has become dependent on the tourist industry. Short term rentals impact the local economy and are continual drivers for the local community. Have you considered how many people are employed by such rentals?

If current SRT owners sell their places because of restrictions you are considering, I'm guessing that no one will buy them.

If these restrictions are put in place, I will not be moving forward with my plan and I'm guessing others will be rethinking their plans.

I believe there is more affordable housing in the area outside of Packwood for those employed in the tourist industry, just as with Leavenworth.

Please think long and hard at the impacts of this decision on the Packwood Community.

Respectfully,
Jane Palmer

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From: [Brenda Atkins](#)
To: [Mindy Brooks](#); [Scott Brummer](#); [Sean Swope](#); [Lindsey Pollock](#); [BOCC](#)
Subject: Written testimony for July 8 Planning Commission Public Hearing
Date: Saturday, July 5, 2025 12:25:09 AM

Some people who received this message don't often get email from knottypinecabinrentals@gmail.com. [Learn why this is important](#)

To The Lewis County Planning Commission, Mindy Brooks, Lewis County Commissioners: Scott Brummer, Sean Swope, & Lindsey Pollock, and BOCC

Regarding the proposed STR regulations and restrictions, I am submitting written testimony in opposition to its implementation. Until there is an economic impact study and data presented to the public as to what the purpose of the proposed regulations are and how these regulations will solve said purpose, implementation should be indefinitely set aside.

Due to the already increased assessments & taxes imposed on STR owners by the county assessor's office, personal property taxes and B&O taxes, I feel that adding a permit and fee (of an unknown amount) is putting an unnecessary burden on STR owners for what is supposed to be passive income.

We are retirees and in our personal situation, being able to rent our properties has allowed us to keep our primary residence, pay our property taxes, perform maintenance & upkeep, as well as providing accommodation's to the tourism industry of this small mountain town area.

We have 3 rentals in Lewis County, one of which is in Paradise Estates and is our primary residence. Lewis County, Paradise Estates, Airbnb, & VRBO etc. already have regulations in place for Septic, water sources, noise, Trash cans, parking, smoke & carbon monoxide detectors, emergency contacts, exits etc. These proposed items are redundant and unnecessary as all STR's must be well maintained & operated in a manner that protects public health & safety, as well as up to our guests & any platform's expectations.

Additionally, the trash cans provided by Lemay are heavy duty, sanitary and secure. We also are now 'forced' to have & pay for a recycling bin, which is an additional expense. Keeping these receptacles indoors is unrealistic. How and why would this be required? Do you or anyone you know keep your trash receptacles indoors? Keeping them off the streets unless on pick-up day is reasonably expected.

Our particular rentals are limited to 2-4 guests, essentially 2 per bedroom. I have plenty of parking spaces that are on the property itself and not on the street. We only rent for 4 to 6 months per year, and our rentals are not booked every single day of those months. The point being, that our occasional 2-4 guests are quiet and have less impact on the environment, septic, water supply, my property and residential housing supplies than full time residents that do not follow any of the existing or proposed regulations. We are not interested in providing long-term rentals, instead we would try to sell our properties.

If the goal of the proposed regulations is to provide affordable housing, limiting the amount of STR's is not the answer. In our case, our primary residence is now assessed at over 1.4 million dollars, not affordable for most working-class citizens in this area. Our other 2 STR's were built over 35 years ago and were not designed for full-time living. They are recreational/weekend cabins.

We have some permanent residents as neighbors that are much more of a detriment to the neighborhood. Such as 6-8 people living in a 2-bedroom single-wide trailer, noise, unkempt property, vehicles parked on the street, barking dogs, and frequent partying and loud music after quiet hours. Yet they are allowed to continue this behavior with no repercussions. Our STR renters are not 'the problem'.

We have lived in Ashford since 1987. Our neighbors already know how to contact us if there is an issue. We do not want our names & phone numbers to be seen from the road. This just invites unwanted solicitation, vandals and possibly scammers.

It is inevitable that we will want to sell our properties at some point. If our properties are being taxed at a higher rate because they are part-time STR's and now a possible permit process & fee (of who knows how much), which we cannot transfer to new owners, this will severely diminish our chances of selling in a timely manner, and or possibly having to reduce the asking price below assessed values. In essence, you are proposing to reduce our retirement income, that we have been counting on for over 35 years.

We feel it is wrong to put a cap on existing STR's and not allow transfer of proposed permits upon sale. These are the 2 most concerning parts of this proposal. People have put their hearts, soles & lives into these accommodations, as well as having made substantial financial commitments. Contrary to popular belief, owning an STR is not a 'get rich quick and easy scheme'. It is a tremendous amount of work, expensive, and can be a bit stressful. And for some, it either supplements or is their only source of income and retirement.

If it is necessary to incorporate the proposed permit process, it would best serve Ashford & Packwood if not all of Lewis County, if the existing STR owners were grandfathered in and not restricted by the 25% cap. And if sold, the permit be transferable to the new owners if they so desire, until it expires.

STR's provide tourism dollars to our small mountain towns, which in turn provides income for restaurants, stores, gas stations, taverns, etc. STR's provide jobs for cleaners, maintenance, gardeners, handymen, local tradespeople, managers, etc. New & old businesses, government offices, and annual events benefit from having STR renters who spend their money to get away to Mt. Rainier.

Limiting the amount of STR's to 25% of existing dwellings would decrease the profits for local businesses as well as the county offices and programs, such as the Treasurer's office who

collect extra taxes for Real and Personal Property of STR's.

Thank you for considering our written testimony,

Brenda & Les Atkins

Knotty Pine Cabin Rentals, Ashford WA

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Jess and Rachael Bouma
107 Robb Road
Packwood, WA 98361
253-219-4199
coaspens@gmail.com

July 3, 2025

Lewis County Planning Commission and Board of County Commissioners
351 NW North Street
Chehalis, WA 98532

To the Lewis County Planning Commission,

My name is Jess Bouma, and my wife Rachael and I have owned a home at 107 Robb Road in Packwood since 2013. Our 4-bedroom, 2.5-bath log cabin sits on three partially wooded acres and has served as a cherished retreat for our family, friends, and as a weekend getaway donation to nonprofit causes. We have been friendly with our local neighbors, including offering the pick up of grocery and pharmacy items from “town” for our elderly neighbors when we came up to the cabin. Over the years, we have also offered it as a short-term rental (STR) through Airbnb and VRBO. In twelve years, we have not had one neighbor (or other) complaint.

We are writing to share our concerns about the proposed STR regulations in Lewis County. We learned of the June 23, 2025, Planning Commission meeting only through social media. Given that our property has been identified by Granicus for both the Assessor’s Office and the Planning Commission, we are disappointed that there was no direct communication to property owners who would be impacted by these proposed regulations.

While we appreciate and support the County’s goal of increasing affordable housing, we believe that limiting STRs will not achieve that objective—and instead, would impose significant economic harm on the Packwood local economy, community, and its residents.

Local Economic Impact

Short-term rentals like ours support year-round employment and provide meaningful economic stimulus to Packwood. In 2023 alone, we paid:

- **\$11,429.75** to AT Cleaning & Hospitality (Packwood/Randle residents)
- **\$2,139** to TM (Packwood) for yard maintenance
- **\$5,780** to AJ (Packwood) for plumbing and septic work
- **\$1,340** to the Lewis County Water District (this was a fire year, we had sprinklers on for weeks)
- **\$3,554.39** to Lewis County PUD for electricity

These are just a few examples of the many local service providers we hire. *Well over half of our rental income goes directly back into the local economy.* These jobs and contracts support real people—many of whom depend on STR activity to earn a living in an area with limited employment opportunities.

Property Tax Impact

Since we purchased our home in 2013, our property taxes have increased from **\$2,949.16** to **\$8,362.19** in 2025—a **55.5% increase over the prior year alone**. Potentially, this additional tax revenue assessed to STR properties could be used toward creation of affordable housing?

We were recently informed by the County Assessor’s Office (email from Chris Lanegan June 18, 2025) that only the sales of properties identified as STRs were used to determine our property’s value. This method appears to unfairly target STR owners for disproportionate tax increases, without applying an income-based approach or considering actual rental data. (This raises serious concerns about equity and transparency in the valuation process.)

STR Regulation & Affordable Housing

We fully support the development of more affordable housing in Lewis County and appreciated the information presented at the June 23, 2025 Planning Commission meeting. However, we believe that the current approach—to cap or restrict STRs—is misguided and unsupported by data or economic analysis.

Key Points:

- **STRs and affordable housing serve different markets.** Our vacation property, situated on three acres and built with custom finishes, is not a viable candidate for long-term affordable housing. Even modest nearby properties—like one listed at \$85,000 in 2019—were not purchased by local residents, but by out-of-town buyers using them as vacation homes. This dynamic predates the current STR boom.
- **Tourism is now Packwood's leading industry.** With the decline of logging and government jobs, tourism—bolstered by STRs—has become essential. According to the Planning Commission's own June 23, 2025 presentation:
 - o Packwood Visitor Center check-ins rose from **1,903 in 2019** to **8,000 in 2022**
 - o Mount Rainier trips from Packwood increased from **98,037 in 2019** to **114,334 in 2022**
- **Limiting STRs won't create affordable housing.** Numerous studies, including one from [Rent Responsibly](https://www.rentresponsibly.org/affordable-housing-vs-strs-what-does-the-data-say/), show that STR regulations do not significantly increase long-term housing supply—but do reduce jobs, tourism income, and tax revenue. <https://www.rentresponsibly.org/affordable-housing-vs-strs-what-does-the-data-say/>
- **According to the Packwood Housing Needs Assessment (August 8, 2023):**
 - o 40% of homes are unoccupied (likely vacation homes)
 - o 14% are used as short-term rentals
 - o 18% are long-term rentals
 - o 28% are owner-occupied

This data underscores that STRs are only a small portion of the housing picture, and most unoccupied homes are not being used as STRs at all.

Our Recommendations

We urge the County to:

- **Conduct a formal economic impact study** before implementing any regulations that could harm local jobs, small businesses, and tax revenue.
- **Engage housing consultants** to assess realistic, targeted strategies for creating affordable housing and assess how much affordable housing is actually needed.
- **Recognize that public investment and policy incentives** will be necessary to make affordable housing development financially viable. Capping STRs in Lewis County will not solve this problem.
- **Include STR owners and hospitality workers** in a collaborative, solution-focused dialogue. We want to be partners with the county in ensuring minimum standards are met and so we can be good neighbors.
- **Avoid STR caps or restrictions** that penalize responsible STR operators who meaningfully contribute to the community and the local economy. These will only freeze the housing challenge and not solve the problem.

In Summary

- **Affordable housing is a critical issue** that demands thoughtful investment and planning
- **STR restrictions will not solve the housing crisis** and risk undermining Packwood's growing tourism economy
- **Tourism is Packwood's most viable economic engine**—and short-term rentals are a key component

Thank you for your time, attention, and consideration of our perspective.

Sincerely,

Jess and Rachael Bouma



1201 3rd Ave Suite 2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org



July 3, 2025

Lewis County Planning Commission
c/o Mindy Brooks
351 NW North St
Chehalis Washington 98532

Dear Planning Commissioners and County Staff:

Subject: Comments on Lewis County's proposed development regulations update.
Sent via email to: mindy.brooks@lewiscountywa.gov

Thank you for the opportunity to comment on Lewis County's proposed development regulations update. Futurewise supports the development regulation update. This letter will first summarize our comments and then provide more detailed comments and recommendations.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State including Lewis County.

Summary

- Futurewise recommends that Lewis County Code (LCC) 17.142.160(1) be amended to limit multi-family housing in Limited Areas of More Intense Rural Development (LAMIRDs) to those areas with existing sewer service. Please see page 2 of this letter for more information.
- The Growth Management Act requires Lewis County to adopt water quantity regulations as part of the 2025 comprehensive plan and development regulations update. Please see page 2 of this letter for more information.
- Development regulation amendments are needed to implement the resiliency element and comply with RCW 36.70A.070(9)(e). These amendments are needed to protect people and property from increasingly severe natural hazards such as increased flooding. Please see page 5 of this letter for more information.



Comments on Lewis County Code 17.142.160 Multifamily housing in LAMIRDs

Engrossed Senate Bill 5471, adopted as Laws of 2025 Ch. 386, in Section 1(1)(b) provides that the county “development regulations must ... (iii) Require that middle housing in limited areas of more intensive rural development be served by existing sewer service.” This bill will take effect on July 27, 2025. You can find the bill at this link: <https://lawfilesexternal.wa.gov/biennium/2025-26/Pdf/Bills/Session%20Laws/Senate/5471.SL.pdf?q=20250703170209>

Lewis County Code (LCC) 17.142.160(1) does not limit the multi-family housing to areas with “existing sewer service.” We recommend that LCC 17.142.160(1) be amended to limit multi-family housing in LAMIRDs to those LAMIRDs with existing sewer service. Our recommended addition is underlined below.

(1) Multifamily housing is only allowed in LAMIRDs that have centralized water and wastewater facilities that are able to accommodate the density of the units. The wastewater facilities to serve the multi-family housing must have existed on July 27, 2025.

The Growth Management Act requires Lewis County to adopt water quantity regulations as part of the 2025 comprehensive plan and development regulations update.

RCW 36.70A.070(1) provides that “[t]he land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies.” RCW 36.70A.070(5)(c)(iv) provides that “[t]he rural element shall include measures that apply to rural development and protect the rural character of the area, as established by the county, by: ... Protecting surface water and groundwater resources.” The Growth Management Act (GMA) in RCW 36.70A.590 also provides that:

For the purposes of complying with the requirements of this chapter [the GMA] relating to surface and groundwater resources, a county or city may rely on or refer to applicable minimum instream flow rules adopted by the department of ecology under chapters 90.22 and 90.54 RCW. Development regulations must ensure that proposed water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 and 58.17.110.

Development regulations must comply with the GMA including these requirements.¹ These development regulations are required because overuse of surface or ground water often harms senior water rights holders and fish and wildlife habitat. For example:

Increasing demands for water over time, from ongoing population growth, agriculture, and other consumptive uses as well as associated land use practices, have resulted in lower streamflows and declining groundwater levels in some areas. These decreases have impacted important resources for fisheries and general stream health. The impacts of climate change in WRIs 22 and 23 are also yet to be fully realized. However, it is apparent that water availability is limited throughout the Chehalis Watershed.²

The word “limited” overstates the available water. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, “[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for ...”³ All of the state's waters are already allocated.

To comply RCW 36.70A.070(1), RCW 36.70A.070(5)(c)(iv), and RCW 36.70A.590, the development regulations should adopt regulations to ensure development complies with the water codes, the applicable instream flow rules, the watershed plan updated under RCW 90.94.020.

RCW 36.70A.590 requires the policies and development regulations to ensure that proposed water uses are consistent with RCW 90.44.050. To comply with RCW 90.44.050 for residential permit exempt wells, the policies and development regulations must require that the County when determining if a development, land

¹ *Kittitas Cnty. v. E. Washington Growth Mgmt. Hearings Bd.*, 172 Wn.2d 144, 164, 256 P.3d 1193, 1203 (2011) citing RCW 36.70A.130(1); accord RCW 36.70A.290(2).

² State of Washington Department of Ecology Water Resources Program, *WRIA 22 & 23 Chehalis Watershed Water Availability* p. 3 (Publication 20-11-022 Revised Sept. 2022) last accessed on April 21, 2025, at:

<https://apps.ecology.wa.gov/publications/documents/2011022.pdf> and at the link on the last page of this letter with the filename: “2011022.pdf.”

³ Conrad Swanson, *Trump keeps talking about taking PNW water — is that possible?* *The Seattle Times* (Updated Feb. 23, 2025 at 7:00 am) last accessed on April 21, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: “Trump keeps talking about taking PNW water is that possible.pdf.”

division, or use qualifies for a permit exempt well under RCW 90.44.050 to ensure that the water used by the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002 on those lots does not in total exceed the 5,000 gallons a day allowed by RCW 90.44.050. Under the State Supreme Court's *Campbell and Gwinn* decision, each lot is entitled to one 5,000 gallon per day permit exempt withdrawal for single or group domestic uses under RCW 90.44.050.⁴ A "developer may not claim multiple exemptions for the homeowners."⁵ So each lot that existed in 2002, the year the *Campbell and Gwinn* decision was decided, is entitled to one permit-exempt withdrawal under RCW 90.44.050.

As lots are subdivided or developed over time, part or all of the permit exempt withdrawals are used by the lots created or the development authorized. To qualify for a permit-exempt groundwater withdrawal authorized under RCW 90.44.050, the lot must have some remaining water from the parent parcel's single 5,000 gallon per day permit exempt withdrawal for single or group domestic uses.

Therefore, the required development regulations can only authorize the use of a permit exempt-well or well system for single or group domestic uses if the water use does not exceed the 5,000 gallons a day allowed by RCW 90.44.050 including the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002. To comply with RCW 36.70A.590, the proposed policies and development regulations must include this important limitation. Therefore, we recommend the water quantity development regulations comply with the applicable state water laws including limiting each lot that existed in 2002 to one permit-exempt withdrawal under RCW 90.44.050 including the water used by any land divisions or developments and also comply with RCW 36.70A.590.

This regulation also helps to protect families that buy lots and houses that rely on permit exempt wells. Developments that are approved in violation of RCW 36.70A.590 and RCW 90.44.050 do not have a legal water right. Their current and future water use is not legal.

⁴ *State Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 14, 43 P.3d 4, 110 (2002).

⁵ *Id.*

Development regulation amendments are needed to implement the resiliency element and comply with RCW 36.70A.070(9)(e).

As part of the 2025 comprehensive plan update, Lewis County is required to adopt a resiliency subelement.⁶ RCW 36.70A.070(9)(e)(i) provides in relevant part that:

The resiliency subelement must prioritize actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. Specific goals, policies, and programs of the resiliency subelement must include, but are not limited to, those designed to:

- (A) Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration;
- (B) Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice; and
- (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.

Complying with these requirements will require new and amended regulations especially to protect and enhance natural areas, to protect and enhance community resiliency, and to address the natural hazards. For example, the

The County's highest risk hazard is flooding. There are over 5,500 buildings within the 1% annual chance floodplain, exposing about 20% of the economic value of the county.

However, not all of these buildings are highly vulnerable to flooding. Buildings that have their floor elevated above flood waters will sustain less damage. Over time these buildings as well as buildings

⁶ RCW 36.70A.070(9)(c).

Comments on Lewis County's proposed development regulations update.
July 3, 2025
Page 6

current outside of the 1% chance floodplain will become more vulnerable as flood discharges increase and flood levels rise.⁷

Development regulations are necessary to address rising and expanding flood plains and other hazards created or aggravated by climate change.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich
Director of Planning & Law

Enclosures at the following link:

<https://futurewiseorg.sharepoint.com/:f:/g/EvssmbmIn2ZFpTopKYJyA94Bf95jJxz8Fc5DST7GEwhAvw?e=IfqL5H>

⁷ Lewis County Emergency Management, *Natural Hazards in Lewis County* story map last accessed on April 21, 2025, at: <https://lewiscountywa.gov/departments/emergency-management/2023-lewis-county-hazard-mitigation-plan-update/>. See also the climate change increases in the County's flood plain shown on page 101 of the Pertee, *Draft Lewis County Hazard Mitigation Plan Update Volume 1: Planning-Area-Wide Elements* (March 2024).

K&J Hannem concerns regarding DRAFT PROPOSED Short-term Rentals for Lewis County, specifically Packwood, WA.

17.105.030

1. For properties that are not within the Urban Growth Area identified on the map, how do these regulations apply? For the 25% per development, for properties not part of a development (ie: Goat Rocks, Timberline, High Valley (HVCC)) how does this percentage apply? What is the total 25% number based upon?

3. It was stated in the presentation meeting in Packwood on June 23, 2025, many of the concerns centered around capacity of septic and water. Neither of which are an issue for the property we have developed. Our 1.2-acre property has a four-bedroom septic, with a small two-bedroom house (1356 sq ft) and a detached bedroom (543 sq ft), and a shared well which provides over 110 gallons of water per minute. Why would the same limits that apply to quarter acre lots apply to our 1.2-acre lot? This makes no sense. This is NOT a one size fits all issue. How will you consider exceptions?

17.105.040

6. *Name and phone number posted at the road-* Why? Disruptive behavior is not limited to STRs. *Local means within Lewis County.* This makes no sense! The miles from several towns located in Lewis County are farther than several towns in Pierce County. See examples below.

Lewis County Mileage	
PeEll	97 miles
Chehalis	75 miles
Centralia	79 miles
Morton	33 miles

Pierce County Mileage	
Spanaway	65 miles
Puyallup	70 miles
Elbe	33 miles
Ashford	25 miles

7. *Solid waste shall be stored indoors.* Who stores garbage indoors, this is a health hazard. Secured receptacles is one thing, however if you secure the lid of a LeMay garbage can, it cannot be dumped when placed at the street for pick-up. Why would only STRs be required to secure garbage?

17.105.050

2.c Requiring solid waste collection of STRs is punitive unless there is a verified issue. If property owners are required to store solid waste in a secure receptacle, dictating how that waste is removed from the property is unreasonable.

QUESTIONS

1. Are any exceptions considered for the small mom and pop businesses that have three or less rental properties?
2. It appears the goal of the proposed regulations is just to limit short term rentals; or, is the goal to improve the neighborhoods and preserve the small town of Packwood?
3. The severity of the STR limits and standards appear to punish all STR owners. What is the plan to hold 5%-10% of the irresponsible STR owners accountable and not punish the many that are positively contributing to the town and economy of Packwood?

Thank you for your consideration and responses to our concerns.

Karolyn & Jeff Hannem

Kdbh131@gmail.com

From: [Karolyn Hannem](#)
To: [Mindy Brooks](#)
Cc: [Jeff Hannem](#); [Karolyn Hannem](#)
Subject: Questions and concerns regarding DRAFT PROPOSED Short Term Rentals for Packwood, WA
Date: Saturday, July 5, 2025 1:59:13 PM
Attachments: [KJH Concerns regarding DRAFT PROPOSED Short term Rentals for Lewis County.07052025.pdf](#)

You don't often get email from kdbh131@gmail.com. [Learn why this is important](#)

Mindy,

Please see attached questions and concerns regarding the DRAFT PROPOSED Short-Term Rentals for Lewis County. Thank you for sharing this with the planning commission.

I believe our story is a little unique.

Since 1963, when my father purchased property in HVCC, my family has been coming to Packwood. As children, my siblings and I grew up spending many summers playing kick the can, swimming in the pools, walking to the waterfall and the river, and making smores. We grew up in the shadow of Mt. Rainier in the small town of Packwood, WA.

Seven years ago, my husband and I chose Packwood, WA as our retirement destination. We purchased 1.2 acres and built a small two-bedroom home with a detached bedroom. We have a four-bedroom septic and share a well that feeds over 110 gallons of water per minute. As we prepare for retirement in five years, we have been renting our home and detached bedroom on AirBNB.

Our property does not fall within the designated Urban Growth Area (UGA) presented by the county. We are concerned about how these new regulations will impact our future. I do understand and agree that some regulations and future planning are necessary, however applying a one size fits all approach is not reasonable.

Our property was built responsibly and adequately to support the two small units that we do have. Over 70% of our building materials and labor when we were building, were procured in Lewis County. We have been contributing to Lewis County and the Packwood tax base for many years.

My husband, Jeff has been a licensed Real Estate(RE) agent in the state of Washington for 22 years and has been managing property rentals for more than 26 years. Implying that he is not qualified to manage our property because he is located in Lewis County only 50% of the time is short sighted. As a licensed RE agent, he is qualified to receive calls and complaints related to the property, deal with maintenance issues, haul trash and yard debris, and complete repairs, etc.

Reducing and limiting our ability to rent our responsibly developed and managed property jeopardizes our future retirement.

Please share our concerns and consider the possibility of exemptions rather than a one size fits all solution. Thank you for the opportunity to be heard and the work that you do to contribute to the development of Packwood.

Please confirm receipt and that this has been shared with the committee.

Thank you.

Karolyn & Jeff Hannem

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From: [Mick and Val LABERGE](#)
To: [Mindy Brooks](#)
Subject: Draft Proposal for STR comments
Date: Saturday, July 5, 2025 3:12:39 PM

Mindy,

Let me first say that you did a great job during the Packwood informational meeting. You kept us all on track and still answered people's questions without letting a couple people side-track the presentation with their opinions. It was very informative and I'm glad I went.

There are a couple things I'd like to have given to the Commissioners for their consideration regarding Short Term Rentals.

I am now a full time resident and in general would support regulations that would protect my property, privacy and lifestyle. People on vacation tend to want to have a good time which can mean late hours, partying and noise. That doesn't fit very well with the person next door that's in their own home.

A few things that I would like to have in place would be:

- Enforceable quiet hours, like 10pm to 7am
- Limit on parking along the street so that emergency vehicles can get through the street or around a cul-de-sac
- Required trash control so that elk or crows cannot spread it all over the street and into people's yards
- Some way to contact the owner if the people they are renting to do not adhere to the regulations since we do not have a nearby police force
- Requirement that all regulations are posted in the STR, easy to see
- Something in place to alert people in the area to burn bans, fire danger, flood danger, natural disasters
- The cap on how many STR's there can be in an area. 25% sounds reasonable and would prevent too much growth over what we have in place already.

The items mentioned above are already in your regulations for the most part. I just don't want to see them go away before they go into effect.

Thank you for how you have handled this project with the many opportunities to give our input.

I'm looking forward to seeing the final plan put into place.

Valerie LaBerge

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From: [MICHAEL Lanning](#)
To: [Mindy Brooks](#)
Subject: STRs regulations
Date: Friday, July 4, 2025 4:21:08 PM

You don't often get email from ml883@yahoo.com. [Learn why this is important](#)

Mindy and to whom this may concern,

I am opposed to governmental regulations being imposed on short-term rentals (STRs) for several reasons. This letter intends to clarify my concerns.

My concerns are:

1. Too many regulations stifle, if not kill, economic growth.

2. These regulations will disqualify many STR owners who have been operating without any negative impact on the environment or community.

3. The impacts, such as increased septic requirements, parking, and many other requirements, would become cost-prohibitive for many STRs.

4. Too many county regulations will cause STRs not to be profitable, as well as constricting the number of STRs, which will cause STR owners to sell. When too many STR properties are on the market at the same time, property values will drop.

5. When too many STRs leave Packwood, this will cause a shortage of places to stay as well as increased prices for the tourists who would like to visit Packwood. Tourism is the current economic basis of Packwood. This increased regulation would destroy tourism in Packwood.

6. Without jobs, there is no need for affordable housing.

Is affordable housing the reason that led to the idea of regulating STRs?

I would like to know the origins of why the county government feels a need to intervene.

What issues is the government attempting to resolve?

Would imposing regulations resolve these issues or create worse outcomes for the Packwood community unintentionally?

Michael Lanning

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From: [Ted Lind](#)
To: [Mindy Brooks](#)
Date: Saturday, July 5, 2025 9:28:10 PM

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Mindy I read your proposal on the development of short term rentals in Lewis County. After reading the proposal I believe the plan needs some serious revision due to the economic impact that will take place by reducing the number of new dwellings dedicated to short term rentals. I will be in attendance for the meeting on this matter on Tuesday July 8 2025 to present my views against this proposal to the county commissioners .

Sincerely Ted Lind

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From: [Annette Pape](#)
To: [Mindy Brooks](#)
Subject: STRs in HV
Date: Saturday, July 5, 2025 1:57:45 PM

[You don't often get email from annettepape@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hi Mindy-

I heard you were looking for feedback on how the STRs impact those of us that live in HV. If that is true...read on We live at the end of Tatoosh Trail and are heavily impacted by those that rent short term in Packwood.

EVERY STR that I have visited includes the waterfall trail in the "binder". The trail begins at the end of our road. "HIKERS"

People that drive park where ever they want. They frequently block our second driveway, have damaged our rock wall, & let their dogs out of the car off leash.

The dogs more often than not run onto our property, they chase the wildlife which includes heavily pregnant deer, squirrels, stellar jays, ravens, robins. Dogs have ran thru our yard into the Tatoosh National forest behind our home, with the owners chasing behind.

Adults and children stand on our rock wall, knock rocks down and just walk away.

They leave garbage, lots of garbage. Gatorade bottles, beer cans, soft drink cans, water bottles, and DOG POOP BAGS along the trail. Sometimes on the trail itself, thrown off the trail & hung on trees. Along those lines, wads of TP/tissue & the occasional diaper.

Last week someone thought it was ok to throw a nectarine with a couple bites taken out of it into our yard.

We have had people at our fire pit hanging out because they thought it was a park!

"GOLF CARTS"

Many of the STRs make carts available to renters. Children that are obviously under the age of 16 (and those 16 +) speed down our street turning around at the end, over and over and over. Late in the summer the end of our road becomes a dust bowl making it impossible to entertain at our fire pit. Our neighbors have grand children that play in the front yard and it is not safe when the carts are flying down the street. The carts often times have kids hanging off the back, and on several occasions turned so fast that kids n drinks n phones go flying.

"DIRT BIKES"

They either don't know the rules or don't care that they aren't allowed in the national forests/wilderness areas. They speed down the trail like they own it. Same with speeding up & down the street & the cut off to the golf course.

"Party People"

They have zero regard that people actually live in the neighborhood they are renting in. They stay up late hollering and blast their music. Last Sunday there were STRenters that were up until 1am. I had an 8am meeting on Monday...

They build HUGE fires in the fire pits. Yes, you can have fires in pits until a complete burn ban goes into effect, but they build ragers that you can see 3 houses away OVER the fence. The attitude towards fire safety is one of "not my neighborhood/ home, let it burn".

When there is a complete burn ban, they never seem to know and build a fire anyway...

I wish that the owners or rental management would put a BIG notice on the refrigerator during complete burn bans that ALL BURNING IS BANNED.

I was very vocal & led a letter writing campaign when the Packwood Trail Association tried to put a trail head across the street from our place. I can't imagine how much worse it would be.

My husband spends a lot of time "policing". He & another neighbor often make visits to STRs when fires are too big and imparts a little "education".

He also "manages" the parking when our driveway is blocked, dogs are running thru our yard & when we see people dumping trash. People are so disrespectful and unpredictable that I am always nervous that one of these encounters won't end well.

We have talked to HV about all of the above & are told it's a county or USFS problem.

Thank you for hearing me out,

Annette Pape

650-465-9513

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From: [Dawn Ragan](#)
To: [Mindy Brooks](#)
Subject: STR in High Valley
Date: Saturday, July 5, 2025 1:48:16 PM

Mindy,

I understand you are looking for feedback for STR in High Valley.

We have had our property here since 2005, retired to this home in 2019. We chose High Valley for the Community as well as the amenities. In our opinion, the High Valley neighborhood sense of community is being destroyed by the owners who choose to rent out the properties instead of using them for their families and friends which is what was intended. We have people who are that renters walk into yard, into our grass, or stop in our driveway thinking they have rented our home.

They utilize our amenities that we pay for and during busy weekends, we are unable to use due to overcrowding.

The owners often live out of town or even out of state, and have zero connection to our community nor do they want one. They have ruined our sense of community. We are hoping the county continues to minimize the amount that are allowed or even decreasing the number allowed.

We do not have enough law enforcement in the area to respond when renters break the noise ordinance laws, let their dogs run, or have fires they should not have or are too big. We have seen renters take firewood from neighboring properties just so they can have a bonfire without having to purchase wood themselves.

It is too much. They have zero vested interest in our neighborhood, they don't respect it.

Please, please, please help us protect our community for our families. The reason this community was developed.

Sincerely,

Dawn Ragan

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From: [Sara Redfield](#)
To: [Mindy Brooks](#)
Subject: Re: Lewis County's UGA – Small Towns and Short Term Rental Regulation Proposal
Date: Saturday, July 5, 2025 6:13:30 AM

You don't often get email from redfield.sara@gmail.com. [Learn why this is important](#)

One important point that must not be overlooked is the issue of garbage storage and its impact on wildlife. Lewis County holds the contract with LeMay for waste collection. If the County truly sees unsecured trash as a problem—particularly due to animals such as bears getting into garbage—then it has the authority and responsibility to address it comprehensively.

Rather than placing the burden solely on short-term rental (STR) owners, who make up a minority of local dwellings, the County should require LeMay to provide bear-proof garbage cans to all homeowners in rural areas such as Packwood and the surrounding neighborhoods where homes intersect with wildlife habitat. Singling out STRs will not solve the problem. When 75% of homes—occupied by long-term residents—continue using unsecured cans, wildlife will simply move from one property to the next.

A requirement in areas such as the Packwood area for bear-resistant containers is a fair, effective, and affordable solution. It treats all homeowners equally and uses the County's existing leverage with LeMay to implement real change—without placing undue burden on a small subset of residents. This is a proactive step fully within the County's power, and it would offer measurable results in reducing human-wildlife conflict across the entire community.

While I am not opposed to reasonable regulations for short-term rentals (STRs), the current proposed rules are overly broad, burdensome, and inequitable. They place disproportionate responsibility on a small group of property owners without addressing the broader issues that affect the entire community. Moreover, they represent a significant overreach into property owner rights that could set a troubling precedent for how individual use and management of private property is governed in the future.

On Wed, Jul 2, 2025 at 4:08 PM Mindy Brooks <Mindy.Brooks@lewiscountywa.gov> wrote:

Received – thank you

~

Mindy Brooks

360-740-2610

From: Sara Redfield <redfield.sara@gmail.com>

Stan Lin
2678 WA-7
Mineral, WA 98355
wildlinllc@gmail.com
(253) 256-2538

July 1, 2025

Mindy Brooks
Community Development Director
Lewis County Community Development Department
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Ms. Brooks,

I am writing to express my deep concern and opposition to the proposed Short Term Rental (STR) regulations currently under consideration in Lewis County.

As a local farmer and small business owner, we rely heavily on income from short-term vacation rentals to support and sustain our agricultural operations. The revenue generated through our STRs bridges the gap between the rising costs of farming and the unpredictable nature of agricultural income. Without this supplemental income, we would not be able to continue our work on the land—work that contributes to local agricultural production and the open viewsheds and rural character of Lewis County.

In addition to supporting our farm, our STR business provides critical economic benefits to our community. We employ a local housekeeping company—a small, family-owned janitorial business—as well as a team of skilled local handymen and maintenance workers. Our family, workers and guests patronize local restaurants, markets, coffee shops, and activity vendors such as the historic Mt. Rainier Scenic Railroad, all of which provide local jobs and income. These are living-wage jobs that support local families and help circulate money within our community. The proposed restrictions would directly reduce these opportunities, and that loss would be felt far beyond just our household.

Moreover, regulating STRs too harshly will ultimately reduce the tax revenues that benefit the county as a whole. Tourists bring money into our towns, shop at local businesses, and pay lodging taxes that support infrastructure and services. Limiting STRs will limit these benefits at a time when rural economies need more diversification and support—not less. It will also impact our community's charities, as families like ours would not be able to contribute and support such critical initiatives as the expansion of our local Mineral Food Bank, which provides a valuable service to many local families.

We are especially concerned about the proposed limitation on the number of STRs allowed per parcel. On our 57-acre property, we have two legally established dwelling units. The proposed regulation would limit us to operating only one of them as an STR, despite the scale of our land

and the lack of any adverse neighborhood impact. This kind of arbitrary cap applied county-wide could be interpreted as a **regulatory taking**, which occurs when government regulations significantly restrict the use of private property to the extent that it deprives the owner of its economic value or beneficial use. Preventing us from using our second dwelling unit for income generation—when no prior restriction existed—undermines our property rights and our ability to make responsible, productive use of our land.

Another part of the proposal that we find especially unfair is the blanket disqualification of buildings that were previously not required to be permitted. Many property owners have operated in good faith under the rules as they existed. To now retroactively prevent the use of these structures as STRs penalizes those who have contributed positively to the community for years, providing unique stay opportunities for visitors and Washington locals alike. It would also render such buildings economically useless, as they could not be used for long term rentals nor as legal residences, which increases the likelihood that owners will be unable to provide upkeep for structures as they fall into disrepair. Instead of denying these buildings outright, we urge the county to provide a clear and fair path to retroactive permitting—perhaps via inspections, safety compliance upgrades, or other reasonable criteria.

We ask that the county approach this issue with balance and care. STRs are not just a "luxury" or nuisance—they are a vital part of how many working families survive in Lewis County, especially those of us trying to keep family farms alive for the next generation. We have quite honestly been losing sleep over the proposed regulations, as we will not be able to afford our farm if they are passed as written.

Thank you for your time and for considering the voices of your local constituents and also for your work supporting agriculture and ecotourism in rural areas. We hope you will consider more inclusive and supportive alternatives to the current proposal.

Sincerely,

A handwritten signature in black ink, appearing to be 'Stan Lin', with a stylized flourish extending to the right.

Stan Lin & the Lin Family

Wildlin Farm

From: [Ezra Ahn](#)
To: [Mindy Brooks](#)
Subject: Written Testimony on Proposed STR Regulations
Date: Sunday, July 6, 2025 12:05:44 PM

Hello Mindy - I would like to submit the following testimony. Thank you.

Written Testimony on Proposed STR Regulations

Dear Planning Commission Members,

Thank you for the opportunity to provide feedback on the proposed Short Term Rental (STR) regulations. As a property owner in the Packwood community, I support thoughtful regulation of STRs that balances community livability with economic vitality. However, I have serious concerns regarding one particular provision of the current proposal: the **non-transferability of STR permits upon sale of a property**.

1. Permit Non-Transferability Harms Property Values and Resale Opportunities

Under the current draft, STR permits are not transferable when a property is sold. In areas like Packwood, which are subject to a 25% cap on STRs, this can significantly depress the resale value of a permitted STR. Even if a home is actively operating as a successful and well-managed rental, the new buyer may not be able to obtain a permit if the cap has been met. This creates uncertainty for both sellers and prospective buyers and deters investment in properties intended for STR use.

Allowing permit transferability would help maintain fair market value, reduce transaction risk, and ensure continuity in responsible STR operations.

2. Permit Transferability Encourages Better Long-Term Stewardship

If STR permits can transfer with the property, owners are more likely to invest in long-term quality improvements, safety compliance, and community engagement—knowing their investment won't be arbitrarily lost upon sale. A transferable permit incentivizes responsible ownership and better upkeep, as the permit becomes a valuable asset that rewards good stewardship.

3. STR Market Stability Benefits the Broader Local Economy

STRs bring economic activity to Packwood and other rural areas of Lewis County—supporting local businesses, generating tourism, and diversifying the lodging market. Removing transferability adds instability and discourages future investment. A more stable STR market, including the ability to transfer permits, helps ensure consistent guest traffic and sustainable economic development, especially important in communities that depend on seasonal tourism.

In conclusion, I respectfully urge the Planning Commission to revise the proposed regulation

to **allow STR permits to be transferred with the sale of a property**, provided the new owner meets all other permitting requirements. This simple change would preserve fairness, protect local property values, and support a healthy balance between regulation and economic opportunity.

Thank you for your consideration.

Sincerely,
Ezra Ahn
165 Coal Creek Drive

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Mindy Brooks -Community Development Director

Sean Swope – Lewis County Commissioner

Scott Brummer – Lewis County Commissioner

Lindsey Pollack – Lewis County Commissioner

Hello and thank you for taking the time to read my testimony.

As someone who's always had clients with second homes, beach homes, mountain homes, etc, to spend time with family and friends, I always admired that and had no idea it would one day be attainable for my family and I personally.

My husband Aaron and I saved our money to purchase a cabin in Packwood, WA and landed our cabin in 2020. We have hosted many of our friends and family for holidays, birthdays, skiing and hiking adventures. We also decided early on and knew with full-time jobs and a young child in school and sports, that we would not be able to be at our cabin 24-7 year-round. Placing our home on the STR market was an easy decision. How can we maintain our little slice of heaven that we intend to have for the foreseeable future, not have it sit empty and help offset some of the monthly expenses.

The perception and some of the comments I heard from the May 27th meeting are that STR's house a bunch of "partyers and drinkers" and that STR's are "making a killing every month", is simply a myth. With the county raising the property taxes specifically and only on STR's in Packwood over recent years, I can assure you we are not "killing it". The income only exists for most in the busier seasons of summer and winter. The income pays for the cabin and its expenses, if we're lucky and savings for maintenance for things such as new roof, new fence, etc. Meanwhile I'll mention that our full-time neighbors are often guilty of blasting their music and disrupting us and our guests. Several of our neighbors have our contact information and know that they can call me with any news or issues they may come across with renters, they have had nothing negative to report in the 4 years we've been renting.

Many of our guests are here to explore the beautiful PNW, they are hiking, biking, skiing and active mellow individuals for the most part. They chose Packwood as their launch pad to Mt. Rainier and White Pass Ski Area.

While some think that having an STR is strictly a business, that is not the case with every cabin located in Packwood. I don't go for more than 2 weeks without, staying and maintaining our cabin. I have friends in the area; I adventure in the area and simply enjoy getting up to our mountain haven in between the hustle and bustle of everyday life.

Although we understand and realize the need for affordable housing in and around the Packwood area, putting a cap on STR's and enforcing potential annual permit fees, other inspection fees and setting forth rules that don't make sense is not the answer. Part time cabin owners did not buy in a tourist area such as Packwood to rent their places long term. They bought these second homes to use as a family when they're able and utilize the surrounding outdoor recreation, such as Mt. Rainier and White Pass Ski Area. The bigger focus should be on getting the updated sewer in motion, so that affordable housing can be built. As it stands, the median housing costs are not affordable for the locals of Packwood. So even if 20 short term rentals ended up going for sale, local individuals would not be able to afford to purchase those homes. Which again is not helping with the affordable housing shortage.

Taking STR's out of the Packwood and Ashford areas would be a huge loss for tourism at Mt. Rainier and White Pass, our service industries (house cleaners, lawn and cabin maintenance, etc) and local businesses. I know it's a tough pill to swallow for the locals that have lived in Packwood their entire lives, but tourism is what keeps Packwood vital and it's only going to continue to grow from here.

The proposal about solid waste being stored in a completely enclosed and secure area indoors, is not possible for many cabin owners and very few have garages or sheds to be able to do this. If this is going to be a new rule, why not enforce it on the whole community and not single out STR's? We have our cleaner and guests pull our cans to the curb before garbage pick-up and then ask them to return them close to the garage upon pick up. Perhaps starting with a simple gesture of requiring homeowners to pull cans back and forth instead of leaving them at the curb entirely would be a better solution.

Many of the proposed regulations being set forth are already in most hosts Airbnb listings and welcome books. Examples of what we as good hosts provide in our listings and for our guests include quiet hours, burn ban restrictions, local contact for emergencies, house rules, etc.

Please hear the voices of many hardworking families that call Packwood their second home. Please consider the potential loss for local service industries, businesses and tourist attractions by displacing locals without jobs, please think of the tourism dollars that pass-through Packwood mostly in the summer and winter months, but really year-round.

Thank you for listening,

Stefanie Brooks

July 6th, 2025

To Lewis County Planning Commission and whom it may concern,

My name is Sadie Childs. I live at 102 Main Street in Packwood. I also own my family cabin there, that I rent as an STR. My parents and my siblings also live there and either own an STR or are employed by them. We are all Packwood residents who rely on this industry to survive.

During the town meeting on June 23rd, Mindy started the presentation with a brief history about the population of Packwood. The town was thriving while the mill was open. When the mill closed, we saw a recession, families moved out and businesses closed. Tourism has brought a thriving industry back to this town and has allowed families to move here again. New businesses are opening, new developments are going in, and none of this would be happening if it were not for STR's. These new regulations to cap STR's are going to stop the growth and potential of Packwood.

My siblings and I are the generation that needs more affordable housing, and we understand that this is not the way to get it. My dad purchased our family cabin in 1981, and it was always a weekend cabin. A place for my dad to hang out with his buddies. 50% of the cabin is a bar. It has no storage, the rooms are tiny, the bathroom is even tinier, but it's perfect for a weekend ski trip, or hunting or hiking. My siblings and I found that keeping the cabin as an STR has allowed us to maintain and upgrade it and keep it available to us whenever we want. If there is a cap put in place and we are no longer able to rent it as an STR, we will not be selling it or renting it to anyone full-time. It will remain a weekend cabin for our family, and we will simply have less tourists visiting our town.

It's also important to note that 70% of the cabins in our neighborhood are weekend cabins. Our cabin is in Skate Creek Terrace where there is a very small population of people who actually live in the neighborhood. And it has been this way since the cabins were built in the 80's. No one has ever lived full

time in these cabins. And if the 25% cap is put into effect, we will be fighting with our neighbors to get a permit. Please also note we already have these STRs operating as businesses and we are paying the county quarterly. The added burden of having to get a permit and jump through hoops to do so is an unfair activity with no legal basis to administer it. So if we were to Vote we vote NO! No permits and no limitations on STRs at all.

Packwood is a very unique town, and the tourism industry needs to be embraced, not limited. I propose that Packwood be exempt from the caps and limiting regulations unless we want to see a complete halt in the growth plan that the committee has been working so hard on. We will not have growth if you limit our only industry. If actual affordable housing is built, such as multifamily housing, limit those from being STR's. But limiting our weekend cabins is not the answer. Give our new generation a chance to have what our parents had. Because of my STR, I am able to be a homeowner and a business owner. And I am excited to see the growth and potential of this town. Please don't stop it all right now.

From: [Olga Dutova](#)
To: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [BOCC](#); [Mindy Brooks](#)
Cc: [Matthew Fairfax](#)
Subject: With regards to the proposed changes to Chapter 17.105 Short-Term Rentals for Lewis County
Date: Sunday, July 6, 2025 3:44:48 PM

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Dear Members of the Lewis County government,

We want to share our personal story and our perspective on the proposed short-term rental restrictions and the potential impacts on both residents and our regional economy, as responsible property owners deeply invested in our Packwood community's well-being.

We purchased our cabin in Packwood in 2020 primarily for family use, having fallen in love with the town, its community, and White Pass from first sight. Our family spends countless hours on White Pass slopes where our son learned to snowboard, and we visit every weekend during ski season. We are even considering retiring here. But it's hard for us to stay in hotels or other AirBnBs, as one of our family members has mobility issues and needs special accommodations (which our cabin has now and many other places cannot provide), this is why we cherish our little place so much.

Short-term rental income allows us to pay our mortgage while living elsewhere for work and keeps our property occupied and maintained year-round. Like many neighbors, we would not consider renting it long-term, as this wouldn't make sense for us. If STR operations become restricted or permits hard to get, we will face a difficult choice: sell our beloved family retreat or let it sit empty for months, attracting squatters and compromising neighborhood safety.

We've listed below a few other thoughts we would love you to consider while working on the STR Regulations:

- **Housing market reality:** Most STR owners would not convert to long-term rentals if restricted as we frequently use those properties off season ourselves, meaning **minimal increase in available housing** stock while imposing significant economic costs on the local economy and residents.
- **Property Values & Tax Revenue:** Many properties have seen significant assessment increases tied to STR income potential. Restricting STRs would devalue properties and reduce county tax revenue. Additionally, if permits aren't transferable with the property during sale, it would create an hard situation—owners won't be able to sell due to reduced demand, we will be unable to rent out long-term or continue operating. This will put housing and labor market in a downward spiral.
- **Local Employment and Small business support:** STR owners directly employ multiple cleaners, landscapers, and maintenance workers. We and our guests also spend significantly at local restaurants, breweries, grocery stores, and recreational facilities at White Pass. Restrictions would eliminate these jobs and dramatically reduce local

business revenue.

- **Tourism Impact:** Restricting STRs would reduce visitor capacity to Mount Rainier area, decreasing tourism revenue that supports our entire regional economy. Many visitors specifically choose Packwood for its STR accommodations.
- **Quality & Community Standards:** Our STR operators maintain high standards and well-maintained properties that enhance neighborhood' quality and safety. We are invested community members who understand the importance of good neighbor relationships and want to preserve it this way. Many of the properties will decay, if not the STR income.
- **Data-Driven Concerns:** The Commission acknowledges insufficient data while proposing significant restrictions. How can effective regulations be crafted without adequate information? We urge you to conduct more comprehensive studies before implementing potentially harmful measures.

Alternative Solution

Our fellow neighbors and rental owners proposed a revised version of the regulation, which we are fully supportive of. Additionally, we suggest considering the successful Portuguese model: modest property tax increases on rental properties, with revenue dedicated to local homebuyer assistance programs. This approach:

- Funds housing affordability initiatives
- Preserves tourism economic benefits
- Maintains local employment
- Avoids market disruption

We kindly ask the Commission to pursue balanced, data-driven approaches that support both housing affordability and economic vitality. The current proposals risk unintended consequences that would harm property owners, local businesses, and the broader community we all care about.

We truly care about residents' needs and want to collaborate on solutions that truly serve Packwood and Lewis County residents while preserving our community's economic foundation.

Thank you for your consideration,

Olga B. Dutova & Matthew D. Fairfax, owners of a cabin in the Elkhorne neighborhood

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July 6, 2025

Planning Commission and Board of County Commissioners
Lewis County
351 NW North Street
Chehalis, WA 98532

Dear Planning Commission and Board of County Commissioners,

I am writing to express my strong opposition to any proposed regulations that would restrict or overly burden short-term rentals (STRs) in Lewis County.

As a property owner and active participant in our local economy, responsible short-term rentals provide meaningful benefits to our communities. These benefits include economic growth, tourism development, preservation of property rights, and positive neighborhood engagement. Implementing unnecessary restrictions on STRs could result in unintended consequences that harm residents, visitors, and small business owners alike.

Lack of Supporting Research

One of the most concerning aspects of the current proposal is the apparent lack of data or objective research used to justify these regulations. To date, there has been no transparent study, community impact assessment, or analysis presented to demonstrate that short-term rentals are causing widespread harm in Lewis County. Decisions of this magnitude should be grounded in facts, not assumptions or isolated complaints.

Sweeping changes to land use policy, particularly those that affect property rights and local economic activity—require a clear, evidence-based foundation. Without such research, these proposed regulations appear arbitrary and risk solving problems that may not even exist.

Support for Local Economy and Tourism

Short-term rentals are a vital part of the tourism infrastructure in Lewis County, especially in areas near Mount Rainier, White Pass, and other natural attractions. STRs provide much-needed accommodations for visitors who may otherwise struggle to find lodging in our more rural regions. These visitors contribute significantly to the local economy by spending at restaurants, small businesses, grocery stores, and outdoor recreation providers.

Restricting STRs will reduce tourism revenue and negatively affect small business owners and workers who depend on seasonal and weekend tourism.

Preservation of Property Rights

Property owners have long had the right to use their land in responsible ways, including offering it as a short-term rental. Overregulation or blanket restrictions not only infringe on those rights but also undermine years of investment, upkeep, and good-faith participation in local commerce.

The sudden threat of regulation, particularly without data or community-wide dialogue, creates an atmosphere of uncertainty for homeowners who have operated STRs transparently and conscientiously.

Addressing Concerns Through Sensible Solutions

I understand that some residents may have concerns about noise, traffic, or safety. However, these issues are not exclusive to STRs and can be effectively managed through enforcement of existing ordinances. Penalizing all STRs for the behavior of a few outliers is unjust and ineffective.

If the County feels regulation is necessary, it should be minimal, targeted, and rooted in clear evidence. Reasonable measures might include:

- Requiring an emergency contact for each STR
- Enforcing safety standards already outlined by state law
- Limiting occupancy based on the number of bedrooms

Encouraging Rural Sustainability

In rural areas, STRs help sustain family-owned properties, supplement retirement income, and provide an economic bridge during the off-season for many residents. STR owners are often local or closely tied to the community and reinvest in the area far more than absentee corporate entities.

Curtailing STRs would not only harm the local economy but would also remove one of the few tools rural property owners have to remain self-sufficient in a changing economy.

Conclusion

I respectfully urge the Lewis County Board of Commissioners to reconsider the direction of these proposed short-term rental regulations. Without credible research, demonstrated need, or meaningful community input, these rules risk doing more harm than good. Let us work together to find balanced, fair solutions that protect our property rights, sustain our tourism economy, and honor the rural values that make Lewis County unique.

Thank you for your time and consideration.

Sincerely,

Michelle Glacken
360-789-1474

From: mglacken18@gmail.com
To: [Mindy Brooks](#)
Cc: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [BOCC](#)
Subject: Proposed STR Regulations
Date: Sunday, July 6, 2025 9:56:27 PM
Attachments: [Lewis County BOCC.pdf](#)

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Attached is my response/feedback regarding the proposed STR regulations presented by the Planning Commission. My husband and I currently own three properties in Ashford. Two of those properties have cabins that we use with our family and also short-term rent.

I was appalled after watching the recording of the Planning Commission's Workshop on 5/27/25. The workshop began with the proposal of very minimal STR regulations in the Packwood UGA only. It quickly evolved into overly restrictive regulations that burden homeowners with excessive red tape, limit their property rights, and discourage tourism-driven economic activity through arbitrary rules and lack of supporting data for **all of Lewis County**. The Planning Commission has no data to back their reasoning for the proposed STR regulations.

Thank you for taking the time to read my attached response.

Michelle Glacken
360-789-1474

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From: [John Guerreiro](#)
To: [Mindy Brooks](#)
Subject: Opposition to STR regulations in Lewis County
Date: Sunday, July 6, 2025 2:33:42 PM

You don't often get email from wukong68@live.com. [Learn why this is important](#)

Dear Commissioners of Lewis County,

The purpose of this e-mail is to express strong opposition to the proposed limitations on short-term rentals (STRs) being proposed for Lewis County, which will have outsized negative effects on communities adjacent to Mt Rainier National Park. Although the desire to address concerns related to community character and potential affordable housing is understandable, stringent regulations on STRs would negatively affect the local economy and residents as well as destroy and devalue the hard work of those who helped build these STRs. Short-term rentals support the rural community, especially given its proximity to the park. These rentals are a key driver of economic activity and offer the following benefits:

Supporting Local Businesses: Visitors staying in STRs increase spending at local restaurants, shops, and attractions, especially in less populated areas. This influx of customers can boost local businesses, particularly during slower months. As hosts affiliated with Betsy's Cabins at Mt Rainier we take great pride in recommending local businesses to our guests, promoting authentic experiences and supporting community-based tourism.

Creating and Supporting Jobs: The STR industry creates jobs for local residents in property management, construction, cleaning, maintenance, and other hospitality-related services. The jobs created by Betsy's Cabins offer competitive wages and benefits, to include funded retirement plans.

Generating Tax Revenue: STRs can contribute to local tax revenue through lodging and occupancy taxes, which can be used to fund public services and infrastructure improvements that benefit the entire community, such as water and parks. Communities across the US have successfully implemented such taxes, generating significant revenue. The additional guests also purchase locally, increasing the tax base as well.

Attracting and Retaining Visitors: STRs attract a wider range of tourists, potentially increasing overall visitor numbers. Many travelers would not have visited or stayed as long without STRs.

While concerns about potential negative impacts of STRs are valid, outright limitations may not be the appropriate solution. Instead, consider a balanced approach that focuses on responsible STR management and enforcement of existing regulations. For example, implementing requirements for registration, permitting, inspection, and fees can help hold bad actors accountable and ensure responsible operation of STRs.

Consider the positive contributions of STRs to the community's economy and residents before implementing restrictions that could undermine these benefits. While there is concern regarding STR's negative effects to the community I would like to note that, prior to the recent increase of STRs, many of the lots sat vacant or in disrepair. The STRs have brought financial growth to the community. With thoughtful consideration and open dialogue, solutions can be found to address community concerns without sacrificing the economic vitality that STRs provide.

Thank you for your time and consideration of this important matter.

Sincerely,
John Guerreiro

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Kathryn Chatterton

From: Harry's Hideaway <hideawayharrys@gmail.com>
Sent: Sunday, July 6, 2025 10:16 PM
To: BOCC; Scott Brummer; Sean Swope; Lindsey Pollock
Subject: Proposed STR Regs Comments
Attachments: STR.Prop.Reg.Comments.pdf

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Dear Honorable Commissioners,

Attached please find the comments my husband and I submitted to the Planning Commission regarding the Proposed STR Regulations. As you can see, we have serious concerns about the substance and process followed in drafting these.

If these regulations go through, we may be forced to sell our Ashford STR (at a loss) because Ashford is over the proposed cap with STRs. This would be devastating to our family. We purchased this cabin with my mother after an accident made travel difficult for her. We used STR income to qualify for our loan, we are still in our first year of operations and have not yet paid for furnishings.

Our family has never caused a problem for the County or our neighbors. We timely pay our taxes, and employ Lewis County residents to help maintain our STRs and pay at least twice the minimum hourly wage. We take pride in being good neighbors and feel blessed that we are able to host families and help them experience the beauty of the mountain. We would greatly appreciate any assistance and support you may be able to provide our family and fellow STR hosts, in navigating this scary time.

Thank you,
Kimberly Anderson

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Kimberly Anderson & Brett Sizemore

364 Craig Road, Packwood
104 Nisqually Place, Ashford
253-414-8270
hideawayharrys@gmail.com

July 6, 2025

Lewis County Planning Commission
351 NW North Street
Chehalis, WA 98532

To the Lewis County Planning Commission,

My name is Kimberly Anderson, and my husband Brett and I own two properties in Lewis County that we rent on AirBNB.

We have reviewed the proposed short term rental (STR) regulations and wish to express concerns with the substance and process of proposing these regulations.

Substantive Concerns

1. The Cap: It will hurt the smallest of the small businesses.

This is our first year owning and operating a STR in Ashford, in the Paradise Estates Community. Roughly 30% of the homes are used as STRs and it is over capacity according to the proposed regulations. If this cap is included in the final regulations, I may not get a permit. If I am lucky enough to get a permit, then not all my neighbors will get one.

Not getting a permit, when my cabin otherwise qualifies, would be devastating to my family. It would put us in a very difficult position financially and we would likely have to sell our cabin at a loss, since we are still paying off the costs of furnishings/improvements.

If I am forced to stop STR-ing my cabin, it is not just me who will be impacted. My closure would impact everyone who I employ to help me maintain my cabin: cleaners, hot tub servicers, plumbers, electricians, chimney sweepers, painters, landscapers, well services, septic services, HVAC services, pest control, internet, electrical, water, and more.

The impact doesn't stop there. There will also be less tourists visiting, and that will have rippling negative effects on the economy as there are less tourists spending money in restaurants, stores, markets, and more. Many areas in Lewis County have strong tourism-based economies. A cap would devastate them.

Further, it is offensive that an idea for Packwood would get projected across the county to Ashford, Mineral, etc. without so much as a community dialogue. Ashford and Mineral are separate towns and local economies, and they deserve to be treated as such.

2. Home Affordability: No specific goal is identified. These regulations will generally hurt home affordability by devastating the tourism economy.

In many ways, home affordability is a complex issue. It boils down to cost of the home and income/ability to purchase a home.

The idea that forcing STRs to close - via a cap - will lower housing costs, is cruel and misguided. Former STR owners forced to close will attempt to sell their home at market value. The same goes for a bank that has foreclosed on a former STR. It also ignores the suitability of such homes. STRs are typically on smaller lots and have limited storage. In contrast, many people who reside full time in Packwood or Ashford, are looking for larger lots with storage outbuildings.

Instead, the cap will lower income and decrease the ability to purchase a home. STRs employ numerous independent contractors to keep their cabins looking tip-top. Guests visit restaurants, stores, markets, gas stations, etc. With less STRs, these residents will have less income. They may face full unemployment. This decrease to income will destroy the other end of the home affordability equation: means to buy a home and credit worthiness.

3. The Sign: Might as well be an “Open” sign for criminals looking opportunities.

According to the Lewis County Sheriff’s Office, most crimes are crimes of opportunity. To decrease opportunities at my STRs, I have invested in a camera, remote-control lights, and window coverings to increase privacy.

Having a sign out front that says my cabin is a short term rental, undercuts all my efforts. The sign functions as an opportunity identification to all criminals. Criminals will feel emboldened to come onto my property and look around, knowing that I do not reside there full time and see if perhaps a guest left a door or window unlocked.

Please remove this requirement. It exposes STRs to an incredible amount of risk and provides little benefit to the community. Why would someone need to call me first in an emergency? Why wouldn’t they just call the police or fire department?

Process of Proposing These Regulations

1. No Studies, No Economic Data: Just a “Test”

For over three years, I watched the County study and consider and draft a Packwood Subarea Plan for the 900 residents. I was impressed by the quality of information, consideration, and written materials.

There are 450 STRs in Packwood, alone. STRs were not studied prior to drafting these proposed regulations. Apparently, they were “pulled together” from other jurisdictions across the country and proposed as a “test.” I don’t know what the “test” is, but it feels particularly cruel to propose a cap - unsupported by data - that will force STRs to close.

2. No STR Involvement: A “Surprise” to STRs

It is disappointing that the County chose not to engage STRs in the drafting process. The County pays for a subscription that provides up-to-date information on STRs and could have easily contacted us.

STR owners would have appreciated a seat at the table and an opportunity to partner with the County on regulations. Instead, the Planning Commission stated that these proposed regulations would be a “surprise” to STRs.

Ask

- 1. Conduct a formal economic impact study in each impacted community, before implementing any regulations that could harm local jobs.**
- 2. Engage housing consultants to assess realistic, targeted strategies for creating affordable housing and assess how much affordable housing is actually needed for for each community.**
- 3. Include STR owners and hospitality works in a collaborative, solution-focused dialogue. We want to be partners with the county in ensuring minimum standards are met and so we can be good neighbors.**
- 4. STR caps are not the way. Recognize that public investment and policy incentives will be necessary to make affordable housing development financially viable. STR caps will only freeze the housing challenges and not solve the problem.**

Thank you for your time, attention, and consideration of our perspective.

Sincerely,

Kimberly Anderson & Brett Sizemore

June 28, 2025

Lewis County Planning Commission

351 NW North St

Chehalis, WA 98532

Dear Planning Commission,

I am writing in opposition to certain portions of the draft short-term rental (STR) regulations, specifically the proposed **25% cap on STR permits** and the **limitations on the number of STRs allowed per parcel**. I own and operate a legally compliant STR in Packwood, WA (when my family is not enjoying the home), and while I support regulation that ensures health, safety, and neighborhood harmony, I am concerned that the current approach will result in unintended economic and housing impacts.

1. Housing Availability (Comprehensive Plan Housing Policy H-2.1)

The proposed 25% cap is intended to preserve long-term housing, but it does so through a blunt instrument that risks removing existing housing from the STR market—potentially displacing over 20 currently operating and compliant businesses. Studies have shown that zoning reform, support for missing middle housing, and targeted affordability programs have a more direct and sustainable impact on housing availability than STR caps (see Urban Institute, 2023, Attachment A).

2. Economic Impacts to Community (Comprehensive Plan Economic Development Policy ED-1.4)

Packwood's economy is highly reliant on tourism. According to AirDNA, there are currently 468 active STR listings, which far exceeds the proposed cap of 447 permits. Curtailing active rentals will shrink lodging capacity, harm local job creation in hospitality, and reduce sales for nearby restaurants, grocers, and retail shops. For many residents, STR income offsets the rising costs of homeownership and helps maintain financial stability.

3. ADU Policy Contradiction (Zoning Code + Housing Strategy H-3.2)

The draft rules also limit STRs per parcel—allowing only one STR on parcels with one or two dwelling units, and two STRs only if there are three or more units. This creates a policy contradiction: on one hand, Lewis County is actively encouraging the development of **Accessory Dwelling Units (ADUs)** to expand affordable housing options, but on the other, this rule disincentivizes homeowners from building them. Many residents build or maintain an ADU in part to rent it seasonally or occasionally and use the income to remain in their homes. Restricting STR use of ADUs may reduce the number of new units added to the housing stock.

A more effective approach would be to allow homeowners the flexibility to responsibly rent ADUs while maintaining strong safety, parking, and noise standards. By regulating **behavior and impacts**, rather than imposing blanket unit limits, the County can encourage new housing and protect community character at the same time.

4. Proportionality and Fairness (Zoning Code Implementation Standard)

Both the percentage and per-parcel caps are inflexible and do not account for actual on-the-ground impacts. I respectfully urge the Commission to revise these provisions to instead focus on **measurable impacts**—such as nuisance complaints, code violations, or density clustering—rather than imposing structural limits that penalize responsible operators.

In closing, I support the County's intent to promote livability and sustainable housing growth, but believe the current regulatory framework needs refinement. I ask that you remove the 25% permit cap and reconsider the per-parcel STR limit in favor of a performance-based model that supports both tourism and smart growth.

Thank you for your thoughtful consideration.

Sincerely,

Jon Hermes & Dan Herbert

The Homestead

Packwood, WA 98361

From: [Tressa Mattioli Lewis](#)
To: [Mindy Brooks](#)
Subject: Written Testimony on Proposed STR Regulations in Lewis County
Date: Sunday, July 6, 2025 11:20:33 PM

You don't often get email from tressa.mattioli@gmail.com. [Learn why this is important](#)

To: Lewis County Commissioners

Subject: Feedback on Proposed Short-Term Rental Regulations

Dear Commissioners,

My name is Tressa Mattioli Lewis. My husband and I own a small, much-loved cabin in Ashford, a place that is incredibly special to us. We have spent years hiking and exploring Mount Rainier NP, and are proud to have now completed over 25 trails in the park (with the goal of hiking them all someday). Our cabin has been the perfect home base for that dream. It is not just a getaway but rather a place where we feel most connected to nature and to each other.

When we started sharing our cabin as a short-term rental, it was because we wanted others to experience the same joy, sense of wonder, and natural beauty that we have found at Mount Rainier. We have now hosted over 600 guests and are proud to maintain a 4.97 rating. We have put a lot of love into creating a welcoming and thoughtful space, one that reflects our love for the mountain and the surrounding community.

After listening to the recent Planning Commission meeting and reviewing the proposed short-term rental regulations, I wanted to share a few concerns, especially regarding the building and septic permit requirements and the proposed cap on rentals.

1. Building and Septic Permit Requirements

Requiring current building and septic permits as a condition for short-term rental approval would place an unfair burden on long-time legacy property owners like us. Our cabin, like many others in the Paradise Estates, was built several decades ago, long before modern codes were in place. Records from that time are often missing or incomplete, and forcing these properties to retrofit to today's standards could be incredibly costly, or even unfeasible without major reconstruction.

These older cabins are often the small, legacy cabins that define the charm and character of mountain towns like Ashford. They tend to have lower guest capacities, are well-suited to couples or small families, and are rarely the source of the kinds of "party house" issues that some of these regulations seem designed to address.

If adopted as written, these rules could unintentionally eliminate many of the smaller, cuter cabins that give this area its unique feel and appeal and replace them over time with larger homes, but also more likely to have higher occupancies and greater neighborhood impacts.

Other counties in Washington — including Pierce, Thurston, Skamania, Mason, Kitsap, Kittitas, Yakima, and Pacific — have already addressed this in more flexible, fair ways. They allow self-certified floor plans, safety inspections, or up-to-date septic pumping records instead of retroactive permits. I urge Lewis County to consider a similar, more balanced approach.

2. Proposed Cap on Short-Term Rentals

The proposed cap on short-term rentals also raises concerns. It does not appear to be based on any specific data or studies, and that lack of clarity makes it difficult to understand the actual need or intended impact.

In a place like Ashford, where the entire local economy depends on tourism, short-term rentals are essential. They support cleaning businesses, restaurants, shops, gas stations, guides, and more. Restricting access to these rentals risks hurting the small businesses that rely on steady, year-round visitors. It also makes it harder for guests to experience the natural beauty of Mount Rainier in the quiet, authentic setting these small cabins provide.

3. A More Effective Approach to Housing

If the county's intention is to promote affordable housing, I completely understand and support that. But limiting small, rural vacation rentals in tourism-based areas like Ashford will not solve the housing crisis. Instead, a more effective solution would be to revisit zoning policies in towns and population centers such as Packwood, allowing for more dense housing, like duplexes or small apartment buildings, where infrastructure and services already exist to support them.

We deeply care about our cabin, the community, and being responsible owners. My husband and I are not investors or developers. We are just a couple who loves Mount Rainier NP, the surrounding community, and wants to share it with others. We support fair, well-reasoned regulation, but we ask that you reconsider these specific elements to avoid unintentionally pushing out the small, historic cabins that are such a meaningful part of this area.

Thank you for your time and consideration.

Warmly,

Tressa Mattioli Lewis
206-556-0107

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From: cowlitzrivercabins@gmail.com
To: [Mindy Brooks](#)
Cc: [Rob Rhodes](#)
Subject: Comments re:Lewis county Str's
Date: Sunday, July 6, 2025 9:48:24 PM

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Mindy,

This letter is our written testimony on the proposed amendment to the Lewis County Code pertaining to Short term rentals.

My wife and I bought existing properties that were being run as a business in 2019. We operate the entire property as a business "Cowlitz River Cabins, LLC." The property addresses are 302 & 322 Carr road, in Randle. These properties are not a second home or vacation home for us personally, it is our business and livelihood. We physically live in Packwood full time. We personally operate the property ourselves. We do not see "Cowlitz River Cabins, LLC." any different than a hotel or small resort. We book through our own website through Onresystems as well as VRBO, Airbnb and Hipcamp.

The current draft if implemented would in essence cut our rental units in half. The decision of this draft proposal is a major concern as it has high potential to put us out of business in which we would be forced to sell the properties due to the impact to our return on investment. Our business plan/model is solely based off of all of our rental units being available. Due to the layout of our cabins and Tatoosh Tipi on the properties, combining long term and short term rentals is not an option. This would also hurt our current employee (housekeeping) who has been with us for four years. This is her only source of income and cutting her income in half would also be detrimental to her and her family, as she is paid per cleaning.

Cowlitz River Cabins and our family is very involved in the Packwood/Randle area. We fund most of the Packwood Fall Festival, we have a "work day" at our cabins for the local youth group and donate to help support their summer trip and activities throughout the year. We also support other various events in the area.

Cowlitz River Cabins, LLC is committed to supporting our local community, however we do not understand the proposal as to its implied impact on residential housing supply. There has been no data supporting this claim as admitted at the meeting on June 22, 2025. It is not certain or adequately explained how regulating vacation rentals will increase low income housing availability.

Not every condition or situation by existing owners are being considered in this draft. No discussion of a "grace period" or "grandfather" clause is in place or was discussed within the draft for certain situations or locations. This is a major concern to us as an operating business in that obtaining a permit annually could force current business owners to close down if permits are limited and/or issued on a rotational basis.

This draft is combining two completely different issues that do not have anything to do with each other. One putting harsher guidelines and more costs through fees on small businesses that operate STR's and two implementing low income housing in the Lewis county area.

Examples that have been included in the draft include things such as specific numbers of guests per STR, parking per number of guests, phone numbers and contacts displayed from the road, putting all STR's under specific guidelines such as must have bedrooms. For example, our Tatoosh Tipi doesn't have what is considered a bedroom, nor does one of our cabins. They have alcoves that have beds in them because it's a chalet. Some vacation properties typically don't have closets in rooms that would be considered a bedroom as in a typical residential home.

Please consider the impact that these changes will have on the Lewis County area, the locals, small business owners, and employees/workers, and tourism.

Thank you for your understanding and consideration.
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July 7th, 2025

Written Testimony Regarding: Proposed STR Regulations

Dear Lewis County,

We chose to purchase in Packwood specifically based on the fact that STRs were allowed. We bought a house from the 1970s that had never been renovated, smelled like cigarette smoke, was covered in spider webs, and needed every surface cleaned with TSP by my own hands. We had to waive the inspection to get the house under contract and after purchasing it, we realized it needed much more work than we had anticipated. Since then, we have spent over \$100,000 replacing and re-doing things, little by little as we can afford to. We drained our savings and continued to work hard in our day jobs (I'm a Yakima school employee and my husband is fruit warehouse manager), to bring this house up to livable standards. With the price of our mortgage and all the money we've spent, coupled with the current WA landlord laws, we would never rent this house out on a long-term basis. And truthfully, we bought this house knowing that. But we knew there was a demand for short term stays due to Mt Rainier and White Pass, and bought knowing we could offset our costs with this strategy.

So many of us demonized, STR owners have poured our life savings, plus blood; sweat; and tears into these houses with the goal of making them a wonderful PNW experience for our guests. We get guests from ALL OVER THE WORLD who get to come experience the unique beauty that is the Mt Rainier area.

Now, with the Lewis County Assessor pretending our house is worth more than it is and increasing our taxes so much since we purchased (\$718,000 assessed value when it's currently for sale for \$565,000 and hasn't had one single offer), our costs are literally to the point where renting it as an STR isn't even profitable. I'd be happy to share our numbers. So certainly, a long-term rental is not viable.

Additionally, the housing crisis is not just in Packwood. Our entire state has a big problem in this regard and most would say, nationally as well.

While I am not against STR regulation, because I understand it is necessary to look out for others in the community as well, I do believe there could be some beneficial tweaks to the regulations proposed by the Planning Committee.

Economic Implications: If you were to do a study on how much money is spent in Packwood due to STRs (paying cleaners, handymen, yard work, etc.) (ACE Hardware due to constantly repairing things that guests ruin), and extra tourism dollars spent in town, you'd see that it IS a big piece of Packwood's economy. STRs bring money to Packwood through employment opportunities and tourism dollars. In fact, STR owners have played a huge role in revitalizing Packwood as many tourists started coming out to Packwood due to no other thing than from seeing some of the viral A-frame cabins Packwood STR owners have worked so hard to fix up.

Capping at 25%: I have been studying STR trends around the nation for many years now and am a world traveler myself, where I have stayed in Airbnbs everywhere from Cuba to Iceland. That being said, the first thing I think that needs to be accepted about Packwood is that it is a vacation market due to its proximity to Mt Rainier National Park and White Pass Ski Resort, but also because of the cabins and chalets one can rent there. Some would like to act as though it's just any old small town, but it's clearly more than that. I did some research and found that most vacation markets cap STRs at 25-30%. I would

urge you to consider capping it at 30% to allow for wiggle room with permitting and to maximize economic growth. Many people depend on money brought in by STRs.

Property Upkeep and Beautification of Packwood:

Being an STR host requires constant upkeep, cleaning, maintenance, and yard work to get good reviews on Airbnb and VRBO. Properties that are STRs often look much nicer and are better maintained than other properties in their area, keeping the neighborhoods looking beautiful and the properties lasting longer.

Posted Local Phone Number: I disagree with the proposal to list a local contact's phone number to be visible from the road. This will open people up to possible harassment, breaches of privacy, and/or unnecessary phone calls or texts. I prefer the method used by many other vacation markets where the owner must give their phone number to all neighbors whose properties butt up against theirs. In fact, all my neighbors already have my number and have called me when a bear got into the garbage or one of them wanted me to ask our guests to keep the noise level down. We have a great relationship and they never hesitate to let me know if they see a problem. In fact, one of them enjoys this because she is lonely and has nothing better to do. And I bring her salmon patties from Costco when she helps me out with something.

Garbage: We have a long drive-way and I don't feel that I can ask my cleaners or guests to drag the garbage container all the way to the end and back each garbage day. ***Would you consider allowing owners to build something at the end of their driveway that keeps the bears out?*** It would be impossible for me to store it indoors. We have no garage and like I say, our driveway is long. Please consider alternative and innovative solutions to this problem that no doubt other owners will have as well. I am sure ideas could be gleaned from other mountain vacation markets but I don't think we should limit ourselves to say "must be stored indoors".

Applying for Permits: My fear with the application process is that as an owner I spend lots of money to replace or fix something at the property with the knowledge that I can recoup that money renting it as an STR and then somehow, I can't get a permit the next year. Current owners have already invested so much money and time, and will continue to do so ONLY if they know they will get renewed the next year. Imagine trying to run a business not knowing each year whether you can get your license again. Knowing that I can operate next year, causes me to spend money on the property, whether in the form of labor (a local person working for me) or materials. Often people break things or we upgrade parts of the house or yard to make it a better experience for guests. I would hesitate to do that if I am not guaranteed that permits will be available to me the next year. It's too risky, especially with the tight margins we are up against in today's economic conditions and county climate (Assessor's Office taxing us out the wazzu). ***Would you please consider every year when it's time for renewal, allowing current STR owners in good standing to get first dibs at applying to renew their permit?*** Please help those of us who have invested so much, and will continue to do so, be protected and essentially guarantee there will be permits for us the following year.

Renting both an ADU and a residence on the same lot: While it is not our scenario, I do feel for the people who, prior to any regulations, built an ADU on their lot to rent out along with their main house. They have invested so much money and now won't be able to use them for their intended purposes. Maybe consider grandfathering some of them in...

Thank you for your time and consideration!

Jessey Allen

130 Mt Rainier Dr

Packwood, WA 98361

From: [cathy burton](#)
To: [Mindy Brooks](#)
Subject: Written Testimony Against Proposed Development Regulations for UGA Small Towns & STRs
Date: Monday, July 7, 2025 1:05:42 PM

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Hello Planning Commission members,

I am Cathy Burton, a full-time resident of Packwood WA. My family has owned a vacation cabin here for almost 40 years. I've seen the changes and ups and (mostly) downs of this small unincorporated part of Lewis County. Packwood was a somewhat thriving little community when the Mill was operating, but when it was shut down, the town became like a ghost town, until half the residents moved away and the remaining started fending for themselves and started the Packwood Flea Market for the Memorial and Labor Day Holidays. There was only seasonal work at the ski lodge. Our cabin became a LTR for a couple years (while they helped deteriorate our beloved jewel) until another family member bought it to save for the rest of the family to use. It has since become an STR, so that we can afford to maintain it properly and pay the property tax. I built a new cabin for myself next door and retired in it. I give you this background because it has been so wonderful for the Outdoor Community to save this little town and turn it into a recreational paradise, for all to enjoy! It has been a wonder to see the new businesses open up and breathe life into this once dead ghost town.

I've seen many places open/close in the meantime. Peter's Inn never did reopen. We still only have one (very expensive) grocery store (albeit I appreciate the inventory they maintain). They cater much to the visitors, so it is high quality and great selection. However, even this store has been sold, along with the Liquor Store (which never did reopen). So many of the properties are being sold to out of towners and developed with NO OPERATING SEWAGE SYSTEM in this town. That should be the number 1 PRIORITY of this Planning Commission. If limiting STRs to 25% is supposed to remedy the livable housing problem in Packwood, you are sorely mistaken. These homes will turn back into family vacation homes, not LTR's. This proposal will shut down this lovely little town and make it more unaffordable for outsiders to move in.

I wonder how this applies to all STRs, as well? Will all existing motels/hotels/brewery rooms also need to meet the same 25% rule?? There are motels here that can be booked through AirBnB. Will they need to shut down 75% of their business? I would expect your response to be "well that's their businesses". Well guess what, it's our business too and we saved this town from extinction, not the motels.

All that said, please focus on the Wastewater Treatment facility we so desperately need to enable structured, economic growth to keep us on the map. As well as the services we need. We finally have a clinic, dental and 911 (mostly volunteer) services, now let us accommodate the Outdoor tourism industry that saved us and the needed affordable housing for the workers to keep the lights on!!

Appreciate the opportunity to comment!

Cathy Burton
PO Box 607
112 Valley View Ct.

Packwood, WA 98632

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To Whom It May Concern,

I am writing to you not just as a property owner in Packwood, but as someone who cares deeply about the well-being of this incredible community. I am asking you to reconsider the proposed restrictions on short-term rentals. While I understand the intent behind these measures, I fear they will bring *unintended consequences* that would harm the very people and businesses that make Packwood special.

Packwood is more than just a small town - it is a gateway to adventure. Nestled just outside Mount Rainier National Park and the White Pass ski areas, Packwood draws families, hikers, skiers, and nature lovers who want to experience the beauty of the Pacific Northwest. Short-term rentals make these visits possible. Without them, many visitors would have nowhere to stay, and they might not come at all. And if they don't come, our local restaurants, shops, outfitters, and service providers will suffer.

But this is about more than visitors. It's about our neighbors - the people who live and work here. Our short-term rentals provide steady, reliable income to cleaners, landscapers, repair workers, and handymen. These aren't faceless contractors. They are people we know and care about. Our cleaner, for example, earns over \$5,000 a month from our properties alone. This income allows them to live here, to support their family, and to contribute to our community. If these restrictions pass, they could lose that income overnight. Where will they go? What happens to their future?

The truth is, our properties were thoughtfully designed and built for short-term rental use. They are not taking housing away from long-term residents. Converting them into long-term rentals would leave them functionally obsolete - empty spaces that no one benefits from. A blanket policy that eliminates responsible, well-managed STRs does nothing to solve the housing challenges we all want to address. Instead, it risks dismantling an entire support network of local workers who depend on tourism to make a living.

Please, before making a decision that could so deeply impact Packwood, take a moment to consider these *unintended consequences*. The vibrancy of this community, the livelihoods of hardworking people, and the future of Packwood as a beloved destination all hang in the balance.

I urge you to work with property owners like us - people who care and want to be part of the solution. Together, we can find a balanced path forward that preserves the character of Packwood without harming those who depend on short-term rentals to survive.

Thank you for your time and consideration.

Paul Campbell

From: [Jess Caslin](#)
To: [Mindy Brooks](#)
Subject: Caslin Written testimony
Date: Monday, July 7, 2025 12:13:49 AM

Hello,

I have been skiing and hiking in packwood for more than 13 years. My children have both grown up skiing at White Pass. We love it so much so, that we bought a cabin. But before we bought a cabin we rented vacation homes, for many years. It was far better than a hotel for a family of four. And it was a joy to learn the different neighborhoods of Packwood.

I strongly oppose the new STR regulations recommended by the Planning Commission. They are unnecessary and would deter growth in Packwood. The CAC has already come up with reasonably regulations that will allow growth and encourage long term rentals as well. Our little town depends on tourism and these radical new rules will hinder vacation homes availability and therefore turn away travelers, hikers and skiers.

Thank you for your time and consideration.

Sincerely,
Jessica Caslin

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From: [sarah child](#)s
To: [Mindy Brooks](#)
Subject: Written Testimony for oral 7/8
Date: Monday, July 7, 2025 9:53:31 AM

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Public Testimony Against Proposed STR Regulations in Lewis County

By Sarah Barnett, Packwood Resident

Good evening, Planning Commission members. My name is Sarah Barnett, and I'm here to urge you—on behalf of myself, my family, and my community—to reject or significantly revise the proposed short-term rental regulations for Lewis County, especially for Packwood.

This isn't just about policy. This is about people.

My husband is a third-generation Packwood resident. His family came here in the 1960s and they helped build this town into what it is today. We are now raising our kids here—our fourth generation. My dad came here before I was born in 1981, I've always felt Packwood as home in my heart. My husband and I both have made it our mission to stay, live, and work here. That's not always easy in a small town with limited economic opportunities. But short-term rentals have made that possible for us—and for many others.

We are not out-of-town investors. We are not faceless corporations. We are locals—your neighbors, your community members—who rely entirely on short-term rentals for our livelihoods. We own and manage properties. We clean them. We maintain them. We provide lodging that draws tourism, which fuels nearly every small business in Packwood. And this doesn't just affect us—this affects our friends and family too. I have multiple relatives and close friends whose sole income comes from STRs. To name a few, my sister, my dad, both our moms and all of our friends that we know.

The proposed regulations—if passed as written—will devastate us. Not hurt us. Not inconvenience us. Devastate us. Here's why:

- The permit requirement with no guaranteed access turns our community into a competition. We will be forced to fight our neighbors for survival. It's a lottery for our livelihoods, and that is not how we should treat working families.
- A 25% cap on STRs means the vast majority of us—those who have built our businesses legally and in good faith—may suddenly be shut out, without warning and without recourse.

- The occupancy limits of two per bedroom plus three severely cut the potential income from larger homes that families rent for reunions, ski trips, or retreats—especially in Packwood, where we serve outdoor travelers and larger groups. These rules would punish us for offering the very hospitality that’s helped keep this town alive.
- Only one STR per parcel will eliminate the viability of many owners’ properties—including ours—by halving our ability to earn, while still being responsible for the full burden of taxes, mortgages, and maintenance.

These rules don’t just limit us—they erase us. We’re not asking to be above regulation. We want fair, thoughtful guidelines that keep the community strong and safe. But this proposal will push out locals, kill small businesses, and hand our future to those with deeper pockets and more flexibility.

This is not the way to preserve Packwood. It’s the way to hollow it out.

We are raising our kids here with the hope that they can stay in the town generations of their family have loved and supported. These regulations would make that dream impossible. We ask you: Please don’t make Packwood unlivable for the very people who built it.

Thank you.

Sarah Barnett and Family
MBA- Eastern Washington University
253-951-9093

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From: [Mollie Coe](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: 202 Paradise Dr
Date: Monday, July 7, 2025 10:34:26 AM

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202 Paradise Dr
Ashford, Wa

Owners:
Mollie and Harold Coe

We purchased the property at 202 Paradise Dr in the summer of 2022.

The plan was to build a 3 bedroom 3 bath home to rent out for families to use for a vacation 4 miles from the Paradise entrance to Mt Rainier National Park. Our funds came from retirement savings with the plan the income would help us in our senior years.

In January 2023 we purchased a tiny home cabin and had it moved to the property. We thought we could use that for a few years before building. That did not work out and we sold it to a local young family that lives in it still. We proceeded with our original idea and settled on the house design with a nearby architect. After the plans were approved we worked with a local septic designer and discovered we had to upgrade to a new system. All work was done with local workers

The cabin build took 10 months by AYC Construction. Andy has a crew and subs from the area keeping them employed year round. Renting the property requires housekeepers and maintenance workers year round. We are contributing to the local economy through jobs and tourism. Already this past year we attended a community event and contributed funds to the Easter event in Ashford. Our local HOA also was seeking donations to rebuild the play ground and we gave \$300.

We have owned our home for 40 years and our rental in Portland for 29 years. Our intentions are to own and maintain the property long term for visitors to enjoy the National Park System as much as our family always has. Our first visit to Mt Rainier was camping in the park in 1996.

We are asking that all existing short term rentals be labeled as Legacy and allow us to continue to operate and ensure the designation would let us sell the property with the right to rent. Beyond ruining our retirement plans it would damage the Ashford economy.

Sent from my iPhone Mollie

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From: [Stacey DeMaranville](#)
To: [Mindy Brooks](#)
Subject: Oppose Lewis County STR regulations
Date: Monday, July 7, 2025 6:39:24 AM

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Hello,

I'm writing to the commissioners regarding the Lewis CO STR regulations. As someone who utilizes STR to relax, explore and spend time with my family and friends, I strongly oppose these regulations. It would make it impossible to afford a STR, if there would be availability. Like many others, I would not vacation here if hotels were the only option.

The drastic impacts to Packwood and surrounding towns from the decreased revenue will result in closures of businesses. If the intent is to find means for local residents who work in these towns and businesses, STR regulations is not the answer, it's actually harmful.

I encourage the planning commission to get accurate data, analysis of the impacts to decreased revenue and if these measures will actually have a positive outcome for "affordable housing". Personal opinions and bias needs to be removed from this process. Please preserve the amazing opportunities we have to enjoy Lewis County in STR. It would be heartbreaking to not be able to return here.

Thank you

Stacey DeMaranville, MSN RN
Bonney Lake, WA

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Testimony of Karli Devoe, Packwood resident, for Lewis County Planning
Commission meeting on July 8th, 2025

Karli Devoe
120 Edmonds Rd
Packwood, WA 98361
360-888-2818
karlidevoe@gmail.com

My name is Karli Devoe and my husband is Perry Piercy. We are full-time residents of Packwood and have been for 5.5 years, when we purchased a home on Edmonds Rd in downtown Packwood that my parents had owned since 2005. Perry is a stay-at-home dad and a substitute teacher with White Pass, and I was, until a month ago, the main Occupational Therapist at the hospital in Morton, when I stepped down to casual part-time in order to spend more time with our two small kids, ages 4 and 1, and help with our STRs. We make our living currently through Airbnb. The full implementation of these regulations, as written, would mean our family, who lives full-time in Packwood, would not be able to survive financially. If the goal is to make Packwood a better place for families to live, these regulations would have the exact opposite effect on my family, and we would have to seriously consider whether we could continue to live here, in a place we both love and are heavily involved in. We live in the house on Edmonds and rent out alternative dwellings, which are being targeted by these proposals. Tourists love these accommodations, and we are not taking housing away from anyone.

I propose the following:

- Remove language targeting the use of RVs, tents, treehouses, tiny cabins as STRs. These are very popular with tourists and bring money to local families and the town without affecting long-term housing.

- To regulate RVs, consider regulating those who boondock and live long-term in RVs, such as over 30 days. Fires, sewage, and sanitation problems are not coming from STR use of RVs, or alternative dwellings, as the owners of these STRs have an extremely strong interest in keeping these accommodations in top

shape and presentation in order to avoid bad reviews and subsequent loss of income. No one is going to rent an RV on Airbnb that has sewage leaking onto the ground. Target existing large RV park owners who allow unsanitary and unsafe conditions. There is an existing very large RV park near Packwood that has a huge drug and sanitation problem, and these are not STRs or tourists.

- Consider adding language which allows modified requirements when issuing RV park permits, such as smaller size, in order to accommodate STRs in the form of RVs in the downtown core, again without taking up housing inventory.

- Do not allow future development without requiring developers to contribute affordable housing inventory. Take the burden off local families and owners and small-scale property investors, and place it on multi-millionaire developers who stand to make huge money off Packwood's popularity.

- Please consider that tourists bring a huge amount of money to Packwood, a town that has struggled economically since the loss of the mill. RVs and alternative dwellings allow for accommodating the influx of tourists without straining permanent housing inventory.

In summary, I strongly believe that implementing these regulations as written misses the mark on making Packwood more livable for full-time residents. We are full-time residents, and these regulations would cause us to have to strongly consider leaving Packwood, a place we love and consider home. It's the only place we have lived together since getting married, and the place we brought our two babies home to.

From: [SHERRI DILL](#)
To: [Mindy Brooks](#)
Cc: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [BOCC](#)
Subject: Protect Packwood Short-term Rentals
Date: Monday, July 7, 2025 2:57:54 PM
Attachments: [Protect STR Petition.docx](#)
[petition_signatures_jobs_490628249_20250706223758.csv.txt](#)

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To the Lewis County Planning Commission,

My name is Sherri Dill. My husband, Sean and I own a short-term rental in Elkhorn and a family-owned construction company. We fell in love with Packwood when our kids were little and we spent time at our friend's property on Eagle Peak. In 2019, we had the opportunity to purchase a neighboring property that we use as our home base in Packwood—this is where our family comes to camp, relax and play together.

Later in 2019, when the Elkhorn neighborhood was created, Sean recognized the opportunity to be a part of building something amazing. We could see that Packwood was on the verge of growing as a destination spot with its proximity to Mt Rainier National Park and White Pass Ski Resort and the amount of people looking to escape the cities. We had no idea that we were on the cusp of covid and what that would do to encourage local travel.

We purchased 2 lots and convinced our small crew to start building part time in Packwood. We had a crew of 4-6 best friends including our nephew, daughter and now son-in-law and whenever the schedule allowed, they were in Packwood and quickly became weekday locals—the team at the Spruce, Longmire, Blanton's, ACE, and the golf course all know them by name. But this was more than a job—they loved the work, we all loved what we were building together, and it became a passion project for all of us.

Since that time, we've all gotten to know our neighbors in Elkhorn and Eagle Peak, and we feel like we are a part of the community in Packwood. We are very proud of the cabins we've built, and we love our family side hustle. We've spent hours dreaming, designing, building & learning to host our short-term rental. We've invested years, hundreds of thousands of dollars and a lot of blood, sweat & tears. We continue to invest and work here because we love it and love being a part of building something special for generations to come and enjoy.

The proposed rules won't create affordable housing or make existing housing any more affordable, but they will make it harder to invest here. I urge you to reject ordinance 17.105 that adds unnecessary restrictions on short term rental owners and instead, look for ways to incentivize affordable housing while preserving the thriving tourism economy, including short-term rentals in Packwood.

The attached petition to Protect Packwood STRs has 265 supporters as of Monday afternoon. The list of supporters is also attached.

Thank you for your consideration.

Sean & Sherri Dill

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The Issue

On behalf of the community of responsible short-term rental hosts and others affected in Packwood and Lewis County, WA. I urge you to reject the 17.105 Short Term Rental ordinance that will harm Packwood's local economy and property rights.

This Ordinance Will Devastate Packwood's Tourism Economy:

Packwood depends on visitors who come to access Mount Rainier National Park, White Pass Ski Area, and our incredible outdoor recreation opportunities. Short-term rentals are an essential infrastructure that makes these visits possible. Hotels and motels cannot accommodate the demand, especially for families and groups who need kitchen facilities and multiple bedrooms.

Without adequate lodging options, tourists will simply go elsewhere – taking their dollars to communities that welcome visitors instead of restricting them.

Proposed Restrictions Are Unnecessarily Punitive Arbitrary caps on STR numbers create an unfair “winner and loser” system among property owners, where some residents will be denied the right to use their property legally while others will benefit. Non-transferable permits essentially steal property value from homeowners. This restriction could make homes unsellable and trap families in properties they can no longer afford to maintain. On the other hand, many if not all of these properties are highly unlikely to be rented long-term either. Burdensome renewal processes with expiration dates create uncertainty that makes business planning impossible. Would you invest in property improvements if you didn't know whether you'd be allowed to operate next year?

We're Already Good Neighbors. As STR hosts, we have strong incentives to maintain our properties well and ensure guests are respectful. Problem properties hurt our reviews and income. The current system of neighbor complaints and existing noise ordinances already addresses legitimate concerns.

Most STR guests are families and outdoor enthusiasts who come here specifically because they love and respect our mountain community.

Additionally, STRs generate significant tax revenue for Lewis County through lodging taxes, property taxes and sales taxes from guest spending at local businesses. Every STR you eliminate means lost revenue for the Lewis County grocery stores, restaurants, gas stations, outdoor gear shops and many more.

Many of us rely on STR income to afford living in this high-cost area. Taking away this income source could force long-term residents to sell and leave the community entirely.

Instead of blanket restrictions, consider:

- Clear complaint processes: Streamline reporting for legitimate issues
- Moderate oversight: Simple registration without expiration or caps

In summary, this ordinance solves problems that don't exist while creating real economic harm. Packwood thrives because we welcome visitors to experience our natural beauty. Don't let bureaucratic overreach kill the tourism economy that sustains our community.

I urge you to vote NO on this ordinance and work with hosts like us to develop sensible policies that protect both residents and our economic future.

Kind regards,

Sherri Dill, on behalf of the attached list of petition signers

Name	City	State	Postal Code	Country	Signed On
Sherri Dill			United States	6/24/2025	
RYAN COX	Olympia	WA	98512	United States	6/24/2025
Lucas Bowers	Packwood	WA	98361	United States	6/25/2025
Olga Dutova	Sammamish	WA	98074	United States	6/25/2025
Amanda Bowers	Packwood	WA	98361	United States	6/25/2025
Nichole Wolfe	Fox Island	WA	98333	United States	6/25/2025
Corie Williams	Tacoma	WA	98407	United States	6/25/2025
Neil Towers	Olympia	WA	98512	United States	6/25/2025
Pawel Oberc	Olympia	WA	98506	United States	6/25/2025
Sean Dill	Tacoma	WA	98446	United States	6/25/2025
David Swanson	Randle	WA	98377	United States	6/25/2025
Kristen Richardson - Roberson	"Packwood,"	WA	98361	United States	6/25/2025
Brian Boschee	Graham	WA	98338	United States	6/25/2025
Shannon Thompson	Seattle	WA	98105	United States	6/25/2025
Jon Inwood	Brooklyn	NY	11226	United States	6/25/2025
Irene Botero	Madrid	WA	28014	Spain	6/25/2025
Kirsten Conrad	Olalla	WA	98359	United States	6/25/2025
Robin Barajas	Randle	WA	989377	United States	6/25/2025
Angela White	9005 us highway 12	WA	98377	United States	6/25/2025
William Conrad	Gig Harbor	WA	98335	United States	6/25/2025
Chandra Wax	Port Orchard	WA	98366	United States	6/25/2025
Royce Marcus	Holly Springs	NC	27540	United States	6/25/2025
Layla John	Seattle	WA	98160	United States	6/25/2025
Nickolas Neville	Puyallup	WA	98371	United States	6/25/2025
Brian Yates	Anderson	CA	96007	United States	6/25/2025
Ruth Densley	Renton	WA	98058	United States	6/25/2025
Thomas Howell	North Bend	WA	98045	United States	6/25/2025
Kelli Armstrong	Seattle	WA	98168	United States	6/25/2025
Michelle Menefee	Tacoma	WA	98407	United States	6/25/2025
Austin Barnett	Seattle	WA	98168	United States	6/25/2025
Sarah Barnett	Seattle	WA	98160	United States	6/25/2025
Andrew Overbeck	Seattle	WA	98105	United States	6/25/2025
Robert Andres	Seattle	WA	98118	United States	6/25/2025
Nicole Tomlinson	Bothell	WA	98012	United States	6/25/2025
Ann Harrington	Chehalis	WA	98532	United States	6/25/2025
Angela Horwath	Shreveport	LA	71118	United States	6/25/2025
Janet McLaughlin	Eatonville	WA	98328	United States	6/25/2025
Colleen Kainz	Seattle	WA	98107	United States	6/25/2025
Jenn Caballes	Seattle	WA	98361	United States	6/25/2025
Juli Jager	Seattle	WA	98117	United States	6/25/2025
Karli Devoe	Seattle	WA	98105	United States	6/25/2025
Kui Maunaloa	Olympia	WA	98501	United States	6/25/2025
Kayla Owens	Packwood	WA	98361	United States	6/25/2025
Callie Lang	Seattle	WA	98160	United States	6/25/2025
Kathy Chace	Chehalis	WA	98532	United States	6/25/2025
Kylee lang	Winlock	WA	98696	United States	6/25/2025
Donna Mowery	Seattle	WA	98105	United States	6/25/2025
Hannah Mowery	Randle	WA	98377	United States	6/25/2025
Marva Knight	Packwood	WA	98361	United States	6/25/2025
Rachael Bouma	Tacoma	WA	98406	United States	6/25/2025
Amy Menefee	Centralia	WA	98531	United States	6/25/2025
Greg Menefee	Centralia	WA	98531	United States	6/25/2025
Briston Meidinger	Packwood	WA	98361	United States	6/25/2025
Karsten Caviezel	Gig Harbor	WA	98335	United States	6/25/2025
F Michael Childs	Seattle	WA	98168	United States	6/25/2025

Denise Shoot Tacoma WA 98445 United States 6/25/2025
 Gracelyn Childs Seattle WA 98168 United States 6/25/2025
 Brenda Walker Boise ID 83706 United States 6/25/2025
 Christopher Peredney Olympia WA 98502 United States 6/25/2025
 Amanda Wohlhueter Puyallup WA 98374 United States 6/25/2025
 Laura Zerr Auburn WA 98092 United States 6/25/2025
 Josh Thompson Seattle WA 98168 United States 6/25/2025
 Stef Hauer Gig harbor WA 98332 United States 6/25/2025
 Justine W Aberdeen WA 98520 United States 6/25/2025
 Linda Prestegard Des Moines WA 98198 United States 6/25/2025
 Amy Spies Enumclaw WA 98022 United States 6/25/2025
 John Wagner Packwood WA 98361 United States 6/25/2025
 Jenna Fox Kennewick WA 99337 United States 6/25/2025
 Marie Tornow Kent WA 98032 United States 6/25/2025
 Lisa Hansen Philadelphia PA 19143 United States 6/25/2025
 Shelly Malleis Packwood WA 98361 United States 6/25/2025
 Sue Padilla Olympia WA 98502 Norway 6/25/2025
 Terrance England Seattle WA 98104 United States 6/25/2025
 James Owen Packwood WA 98361 United States 6/25/2025
 Cheryl Raff Chehalis WA 98532 United States 6/25/2025
 Robert McCarren Tacoma WA 98499 United States 6/25/2025
 Emily Garrison Seattle WA 98104 United States 6/25/2025
 Meredith Rasche Kirkland WA 98033 United States 6/25/2025
 Nicholas Truckey Lakewood WA 98499 United States 6/25/2025
 Anastasia Jazuk Gig Harbor WA 98332 United States 6/25/2025
 Shane Roberson Seattle WA 98168 United States 6/25/2025
 Natalia Danison Kirkland WA 98034 United States 6/25/2025
 Jennifer Hurley Olympia WA 98502 United States 6/25/2025
 Donna McEachern Sumner WA 98390 United States 6/25/2025
 Karli Plughoff Olympia WA 98502 United States 6/25/2025
 Curt Stepp Seattle WA 98168 United States 6/25/2025
 Shannon Bow Packwood WA 98361 United States 6/25/2025
 Heidi Gustafson Sacramento CA 95838 United States 6/25/2025
 Cooper Dill Packwood WA 98391 United States 6/25/2025
 Lori Nehls Prescott AZ 86301 United States 6/25/2025
 Michael Beaupain Arlington VA 22207 United States 6/25/2025
 Destiny Yates Olympia WA 98502 United States 6/25/2025
 Alison Weiss Tacoma WA 98407 United States 6/25/2025
 Mariah Dufrain Packwood WA 98377 United States 6/25/2025
 Ruskin Jazuk Gig Harbor WA 98332 United States 6/25/2025
 Jackie Wells Packwood WA 98361 United States 6/25/2025
 Laurie Plenkovich Tacoma WA 98422 United States 6/25/2025
 debbie jones Tacoma WA 98446 United States 6/25/2025
 Lisa Edwards Bonney Lake WA 98391 United States 6/25/2025
 Joe Malleis Packwood WA 98361 United States 6/25/2025
 vincent yu Redmond WA 98052 United States 6/25/2025
 Taylor Mclynne Silver Creek WA 98585 United States 6/25/2025
 Gloria Boschee Bonney Lake WA 98391 United States 6/25/2025
 Katie Mead Morton WA 98356 United States 6/25/2025
 Gina Peterson Seattle WA 98160 United States 6/25/2025
 Micah Seaton Bonney Lake WA 98321 United States 6/25/2025
 Scott Santhuff Olympia WA 98502 United States 6/25/2025
 Julia Jones Chehalis WA 98532 United States 6/25/2025
 Kristen Richardson Roberson Packwood WA 98361 United States 6/25/2025
 Kimberly McKenney Tacoma WA 98407 United States 6/25/2025
 Shari Schuster Tacoma WA 98466 United States 6/25/2025
 Anna Clayton Randle WA 98377 United States 6/25/2025

Valerie Kero	Seattle	WA	98168	United States	6/25/2025
James Murphy	Morton	WA	98356	United States	6/25/2025
Cathy Burton	Morton	WA	98356	United States	6/25/2025
Amanda Mullins	Glenoma	WA	98336	United States	6/25/2025
Taimoor Ahmed Rana	Spokane	WA	99209	United States	6/25/2025
Valerie Hammons	Tumwater	WA	98501	United States	6/25/2025
Kyle Fox	Packwood	WA	98391	United States	6/25/2025
Daniel Nehls	Prescott	AZ	86301	United States	6/25/2025
Kelsey Fox	Seattle	WA	98198	United States	6/25/2025
Jared Harman	Tacoma	WA	98409	United States	6/25/2025
Jeewan Ghuman	Mercer Island	WA	98040	United States	6/25/2025
Rebecca Pifer	Puyallup	WA	98371	United States	6/25/2025
Darci Gibson	Graham	WA	98338	United States	6/25/2025
Tom Walsh	Bonney Lake	WA	98391	United States	6/25/2025
Steve Pifer	Gig Harbor	WA	98332	United States	6/25/2025
Chris Murphy	Tacoma	WA	98403	United States	6/25/2025
Thomas Mattioli	Seattle	WA	98168	United States	6/25/2025
Patrick Fox	Tacoma	WA	98422	United States	6/25/2025
Elizabeth Fisher	Tocma	WA	98117	United States	6/25/2025
Tracy Reilly	Seattle	WA	98168	United States	6/25/2025
Denette Neville	Seattle	WA	98105	United States	6/25/2025
Hana Abou ouf	Gig Harbor	WA	98335	United States	6/25/2025
Chris Nielsen	Buckley	WA	98321	United States	6/25/2025
Louise Shepard	Brooklyn	NY	11206	United States	6/25/2025
Joe Loeffler	Packwood	WA	98361	United States	6/25/2025
Jessica Caslin	Olympia	WA	98502	United States	6/25/2025
Jake Howard	Packwood	WA	98361	United States	6/25/2025
Andy Starr	Packwood	WA	98361	United States	6/25/2025
Dmitry Alekseenko	Snohomish	WA	98296	United States	6/25/2025
Brenda Atkins	Ashford	WA	98304	United States	6/25/2025
Janel M Stoneback	Seattle	WA	98168	United States	6/25/2025
Les Atkins	Ashford	WA	98304	United States	6/25/2025
Corrina DuRocher	Roy	WA	98580	United States	6/25/2025
Mary Kelly	Packwood	WA	98361	United States	6/25/2025
Meilee Anderson	Tacoma	WA	98407	United States	6/25/2025
John DuRocher	Santa Clarita	CA	91380	United States	6/25/2025
Cindie Furman	Seattle	WA	98168	United States	6/25/2025
Jacky Leach	Lakewood	WA	98499	United States	6/25/2025
Ivan Evdokimov	Seattle	WA	98102	United States	6/25/2025
Cyle Boeck Chehalis	WA	98532	United States	6/25/2025	
Gerry Tornow	Seattle	WA	98136	United States	6/25/2025
Jennifer Kinsella	Seattle	WA	98198	United States	6/25/2025
Heather Curry	Sacramento	CA	95822	United States	6/25/2025
Joel Baker	Bothell	WA	98012	United States	6/25/2025
Chris Boustead	Packwood	WA	98361	United States	6/25/2025
Theresa Moss	Seattle	WA	98105	United States	6/25/2025
Trisha Kasmin	Packwood	WA	98361	United States	6/25/2025
Colleen Peters	Seattle	WA	98168	United States	6/25/2025
Fallon Tobin	chehalis	WA	98532	United States	6/25/2025
Daren Dill	Seattle	WA	98104	United States	6/25/2025
cara Hernandez	Seattle	WA	98168	United States	6/25/2025
Karen Ha	Seattle	WA	98117	United States	6/25/2025
Kevin Epp	Tacoma	WA	98405	United States	6/25/2025
Voshte Gustafson	Lake Stevens	WA	98258	United States	6/25/2025
Aunik Ahmed	Ashford	WA	98304	United States	6/25/2025
Crystal Hardy	Tacoma	WA	98404	United States	6/25/2025
Cassy Smith	Seattle	WA	98105	United States	6/25/2025

Carolyn Sadle	Portland	OR	97225	United States	6/25/2025	
Candi Torkelson	Morton	WA	98356	United States	6/25/2025	
Jason Akers	Tacoma	WA	98446	United States	6/25/2025	
Scott Haase	Seattle	WA	98105	United States	6/25/2025	
Hope Weiss	Orlando	FL	32839	United States	6/25/2025	
Denise Ball	Yakima	WA	98908	United States	6/25/2025	
Jennifer Mager	Seattle	WA	98304	United States	6/25/2025	
Peter Kasmin	Golden Oak	FL	32836	United States	6/25/2025	
Amanda Burgoyne	San Jose	CA	95129	United States	6/25/2025	
Todd O'Mealy	Packwood	WA	98261	United States	6/25/2025	
Jared Postlethwaite	Puyallup	WA	98375	United States	6/25/2025	
Heath Howerton	Olympia	WA	98516	United States	6/25/2025	
William Taylor	Pullman	WA	99163	United States	6/25/2025	
Amarie Stevens	Packwood	WA	98361	United States	6/25/2025	
Michael Ryan	Tacoma	WA	98446	United States	6/25/2025	
Chris Merritt	Packwood	WA	98361	United States	6/25/2025	
Jamie Carbins	Graham	WA	98338	United States	6/25/2025	
Ryan OBrien	Olympia	WA	98512	United States	6/25/2025	
Forrest Wilson	Seattle	WA	98121	United States	6/25/2025	
Kristine Wilder	Louisville	KY	40299	United States	6/25/2025	
Holland Eberhart	Eberhart	Coeur d'Alene	ID 83815	United States	6/25/2025	6/25/2025
Nathan Helm	Seattle	WA	98109	United States	6/25/2025	
Carrie Mills-Tank	Fircrest	WA	98466	United States	6/25/2025	
Kayla Atkins	Buckley	WA	98321	United States	6/25/2025	
Maralyn O'Mealy	Packwood	WA	98361	United States	6/26/2025	
Jana Hansen	Moses Lake	WA	98837	United States	6/26/2025	
Michael Mills	Vancouver	WA	98662	United States	6/26/2025	
Rob Maricle	Packwood	WA	98361	United States	6/26/2025	
Kristin Torgerson	Gig Harbor	WA	98335	United States	6/26/2025	
Michael Kasmin	Chandler	AZ	85225	United States	6/26/2025	
Donna Kasmin	Chandler	AZ	85225	United States	6/26/2025	
Nicole Young	Yakima	WA	98902	United States	6/26/2025	
Barbara OBrien	Tacoma	WA	98424	United States	6/26/2025	
Scott Carnahan	Packwood	WA	98361	United States	6/26/2025	
Cody Zimmerman	Centralia	WA	98531	United States	6/26/2025	
Rebekah Salsman	Port Orchard	WA	98367	United States	6/26/2025	6/26/2025
Brian Kendall	Tacoma	WA	98466	United States	6/26/2025	
Nick Deonigi	Gig Harbor	WA	98332	United States	6/26/2025	
Rishel Kidd Shelton	WA	98584	United States	6/26/2025		
Lieu Duran Ashdod	TX	77007	United States	6/26/2025		
Ryan Garrison	Packwood	WA	98361	United States	6/26/2025	
Amy Aranda	Colorado springs	CO	80919	United States	6/26/2025	
Sidney Waterfall	Spokane	WA	99207	United States	6/26/2025	
Kiley Gustafson	Olympia	WA	98502	United States	6/27/2025	
Matthew Fairfax	Packwood	WA	98361	United States	6/27/2025	
Ryan Bailey	Minneapolis	MN	55409	United States	6/27/2025	
Jerry Lowdermilk	Orting	WA	98360	United States	6/27/2025	
Shelby Campbell	Portland	OR	97221	United States	6/27/2025	
Aaron Spencer	Packwood	WA	98361	United States	6/27/2025	
Linds Burch	Chehalis	WA	98532	United States	6/27/2025	
Brian Hurley	Olympia	WA	98502	United States	6/27/2025	
erin valz	Olympia	WA	98502	United States	6/28/2025	
Valerie Neng	Packwood	WA	98361	United States	6/28/2025	
Cynrhia Hamilton	Richland	WA	99352	United States	6/28/2025	
Ky Mecklenburg	Seattle	WA	98144	United States	6/28/2025	
B Balkan FOSTER	Seattle	WA	98136	United States	6/28/2025	
Mark Yuhasz	Gig Harbor	WA	98335	United States	6/28/2025	

Heath Hodge	Lacey	WA	98503	United States	6/28/2025
Brandon Winmil	VANCOUVER	WA	98682	United States	6/28/2025
Sandra Allen	Gig Harbor	WA	98332	United States	6/28/2025
Scott Menefee	Federal Way	WA	98003	United States	6/29/2025
Wendy Phillips	Gig harbor	WA	98335	United States	6/29/2025
Ginger Rayburn	Tacoma	WA	98406	United States	6/29/2025
Paul Campbell	Corbett	OR	97019	United States	6/30/2025
Shirley Eacker	Centralia	WA	98531	United States	6/30/2025
David Eacker	Centralia	WA	98531	United States	6/30/2025
Casey Wright	portland	OR	97212	United States	6/30/2025
Marcel Noujeim	Helotes	TX	78023	United States	6/30/2025
Nathaniel Nyberg	Packwood	WA	98361	United States	6/30/2025
Joe Wood	Packwood	WA	98361	United States	6/30/2025
Angela cooper	Tacoma	WA	98445	United States	7/1/2025
Leeann Rindlisbacher	Packwood	WA	98361	United States	7/2/2025
Ana Maria Sierra	Tacoma	WA	98406	United States	7/2/2025
Wase Furman	Bow	NH	3304	United States	7/2/2025
Robert Hudon		WA	98377	United States	7/4/2025
Angela Shen	Redmond	WA	98052	United States	7/4/2025
Fallon Tobin	Chehalis	WA	98532	United States	7/5/2025
Debra Dooley	Killeen	TX	76549	United States	7/5/2025
Maxx Smith	Lake Tapps	WA	98391	United States	7/6/2025
Ethan Doolittle	Gig Harbor	WA	98335	United States	7/6/2025
Denise Doolittle	Bonney Lake	WA	98391	United States	7/6/2025
Megan Dill	Packwood	WA	98361	United States	7/6/2025
James Doolittle	Bonney Lake	WA	98391	United States	7/6/2025
Colin Barlow	Gig Harbor	WA	98332	United States	7/6/2025
Collin Baker	Bonney Lake	WA	98391	United States	7/6/2025
Jacob Richardson	Seattle	WA	98118	United States	7/6/2025
Colton Jones	Bonney Lake	WA	98391	United States	7/6/2025
Avery Barlow	Gig Harbor	WA	98332	United States	7/6/2025
Brandon Barlow	Tacoma	WA	98406	United States	7/6/2025

From: [Andrea Durham](#)
To: [Mindy Brooks](#); [Rich Brooks](#)
Subject: STRs Packwood Written Testimony
Date: Monday, July 7, 2025 2:43:03 PM

You don't often get email from buggydurham@gmail.com. [Learn why this is important](#)

Hello Mindy,

Thank you for the opportunity to comment on the proposed regulations for short term rentals in Packwood. We have considered opening our home as a STR as a retirement option. We have one primary dwelling and one ADU on our property. We support and encourage that both dwellings could be used as STRs if rented out to the same family and/or group of friends as mentioned at the June 23 public meeting in Packwood. Particularly because our homes together total two bedrooms and two bathrooms with a large shared outdoor space.

We like the idea of capping use of homes as STRs but hope to not lose the opportunity for additional retirement income as permanent full time residents of Packwood (40 years for my husband and 16 for me). We are still gainfully employed locally and understand that there is no favoritism in capitalism.....just seems there could be some sort of criteria that considers how long one has invested in the community and paid their dues. Or cap the number of STRs one individual or business can operate to level the playing field for everyone.

Respectfully,

Andrea Durham and Richard Brooks

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

From: [Jeffrey Erdman](#)
To: [Mindy Brooks](#)
Subject: Public Testimony on Proposed Short-Term Rental Regulations Naked Elk
Date: Monday, July 7, 2025 1:50:21 PM

Lewis County Planning Commission

From: Jeff & Tara Erdman, Owners of the Naked Elk Lodge, Packwood

Dear Planning Commissioners,

My wife and I own a cabin in Packwood that we've lovingly maintained for seven years, and rent out as an STR (the Naked Elk Lodge). We understand and appreciate the county's need to balance tourism benefits with community concerns about housing availability and neighborhood impacts. We support thoughtful regulation that protects both our local community and the tourism economy that helps sustain our rural area.

However, we respectfully request consideration of several concerns with the proposed regulations:

Our Support for Reasonable Regulation

We support the 25% cap on short-term rentals in Packwood when coupled with future regulatory certainty (see #1 below). This strikes a reasonable balance between preserving housing for residents and maintaining the tourism opportunities that benefit our local economy. We've invested tremendous time, effort, and resources into creating a quality experience for visitors who want to explore the natural beauty around Packwood, and we appreciate regulations that ensure this industry operates responsibly.

Areas of Concern

1. Future Regulatory Certainty

While we support the current cap, we respectfully request assurance that these regulations represent a comprehensive approach rather than a first step toward more restrictive measures. As existing operators who will be grandfathered in, we need confidence that future councils won't further restrict or phase out existing permitted STRs. This certainty is crucial for our continued investment in maintaining and improving our property.

2. Multiple Dwelling Units Per Parcel

The proposed limitation of one STR per parcel when there are two dwellings, regardless of property size, seems unnecessarily restrictive. Our two-acre property could accommodate a second, distinct guest experience without impacting neighbors or housing stock. We suggest the regulation consider property size and setbacks rather than a blanket one-per-parcel rule. This would allow property owners to maximize their tourism potential while maintaining appropriate spacing and privacy.

3. Outdoor Accommodation Restrictions

The prohibition on yurts, RVs, tents, and other alternative accommodations seems overly broad and restrictive to mom and pop operators such as ourselves. These unique lodging options attract visitors specifically seeking an outdoor experience in our beautiful region. If properly permitted and meeting safety standards, these accommodations could enhance our tourism offerings without negatively impacting traditional housing stock. We recommend allowing such accommodations with appropriate permits and safety requirements.

4. Waste Storage Requirements

The requirement to store garbage cans indoors is impractical and potentially counterproductive. Like all rural residents, we face challenges with wildlife getting into garbage. However, requiring indoor storage creates sanitation, space and logistical issues. We suggest allowing secure outdoor storage in wildlife-resistant containers or enclosures, consistent with best practices for all rural properties in our area. Additionally, we suggest the county works with the waste management company to provide appropriate, wildlife-safe containers & recycling.

5. Non-Transferable Permits

The non-transferability of permits creates an unfair economic burden. Property assessments consider STR potential in determining value, yet buyers cannot utilize this income-generating capacity without starting the permit process anew. This effectively devalues existing STR properties and creates market uncertainty. We recommend allowing permit transfers with property sales, subject to new owners meeting all safety and operational requirements.

6. Property Tax Assessment Fairness

While not specifically addressed in these proposed regulations, a significant hurdle for STR operators is the unfair property taxation. Many STR properties in Packwood have experienced dramatic assessment increases—some up to 277% since 2020. How can a more fair process be established, where the assessed value is closer to the actual property value? My recommendation is to assess STRs and primary dwellings with the same comps and methodology, since it's the same housing stock.

Conclusion

We appreciate the county's balanced approach to STR regulation and your recognition that tourism benefits our rural economy. We simply ask that these regulations provide certainty for existing operators while being flexible enough to accommodate the diverse properties and tourism opportunities that make Lewis County special.

Thank you for considering our perspective. We look forward to working with you to implement regulations that protect our communities while preserving the tourism economy that helps sustain places like Packwood.

Respectfully submitted,

Jeff & Tara Erdman

133 Turner Rd, Packwood, WA 98361
206-476-7160
Owner, Naked Elk Lodge

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

From: [Kevin Freitas](#)
To: [Mindy Brooks](#)
Cc: [♥ Connie](#)
Subject: Testimony/comments re: short term rental regulations
Date: Monday, July 7, 2025 9:14:01 AM

You don't often get email from kevinfreitas.net@gmail.com. [Learn why this is important](#)

Director Brooks:

Please consider our following testimony/comments for the proposed planning commission rules regarding short term rentals in Lewis County.

My partner Connie and I are fortunate to own a vacation home at 129 Rainier Vista Dr. in Lewis County outside Mineral that we rent out during the summer months when we're not visiting (which, frankly, is most of the best times for renting). :) We write today to request care when applying new rules to STRs as not all rentals nor owners are the same. Thresholds for nights-rented can make a huge difference for single-STR owners like us who rent to families to keep disturbances in our neighborhood to a minimum and use the money to help offset some of our costs versus investor owners of multiple properties who gobble up real estate inventory and cause local disruption by renting as many nights as possible at whatever price.

Our vacation home would be off-the-market regardless of renting but our mindful rental activity provides more benefits to the local economies and less negative impact than we would alone. Focusing rules and fees on nights-rented versus blanket ones can place the community costs on those who slam neighborhoods with an endless stream of guests vs. responsible owners like us.

With that context in-mind, please consider our feedback items below.

17.105.040 (6)

- Signage large enough to be readable from the road (aside from a simple house number) is not an option in our community due to HOA rules. Perhaps, instead, a scannable QR code or similar can be substituted or, likewise, a simple database searchable by address could be provided by Lewis County of all registered STR owners for easy lookup and access.
- "Local" should be removed as a requirement as, for owners like us near the boundary between counties, some of the people we hire to support our guests aren't strictly in Lewis County. Likewise, even though we're in Seattle, we make ourselves available 24/7 and are able to quickly contact and dispatch any area help if needed. Please focus this requirement on response time vs. location.

17.105.040 (7)

- Landfill and recycling bin location and storage should not be regulated but, instead, focused on safety and accessibility by owners and renters and how best to handle wildlife concerns. Likewise, space is an issue for us when deciding where massive, 90-gallon bins are stored and prescribing "indoor" unfairly targets those without adequate space to do so.

17.105.050 (1)

- Annual fees should be based on nights-rented/used and any fees should be offset by reduced lodging taxes and/or property assessment and related taxes. Our residential use (as defined by

the WA State Supreme Court) does not make us hotels nor should we be taxed as such.

Overall

- Please make clear that renewing a permit annually doesn't mean an owner has to re-enter any pool of available rental slots. As long as we're in good standing, continuity of rental income is key for planning, tax, and personal anxiety purposes.

Thanks so much for carefully considering and applying our feedback. We look forward to continue enjoying our property ourselves and helping the local economies by sharing it with occasional visitors as well.

Kevin Freitas and Connie Parsons
253-229-5093

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Reference to my verbal Testimony is Gallacher 2025

Dear Lewis County Commissioners,

My name is Ashley Gallacher, and I am a short-term rental (STR) owner in Packwood, Washington. I am writing to express my deep concern regarding the proposed STR regulations and to respectfully request that the County consider the broad benefits STRs provide—both economically and socially—to our community.

Our property has been in my husband's family for over 35 years. He grew up spending weekends there, and now our children are fortunate to make their own memories in the same place. We decided to rent the cabin to help cover the increasing costs of property taxes, utilities, and maintenance. STRs are not highly profitable; after paying for cleaning, upkeep, taxes, and supplies, there is often little to no profit—just enough to maintain the home and keep it in the family.

STRs also create real economic value in Packwood. We employ local cleaners, handymen, and contractors—providing reliable jobs with strong wages. Local restaurants, retailers, and service providers all benefit from the year-round tourism that STRs help sustain.

STR platforms like Airbnb also require guests to follow strict policies, which we actively enforce. As responsible owners, we maintain our properties to high standards, and we care deeply about our community's well-being.

Regulating STRs will not solve the affordable housing issue. Studies and real-world outcomes have shown that STR restrictions often fail to meaningfully impact housing availability—especially in rural or seasonal areas like Packwood. For example, in San Diego, after passing one of the strictest STR ordinances in California, the city saw no measurable improvement in housing inventory or rental affordability. Meanwhile, local tourism revenue and short-term job opportunities declined. This underscores the fact that STRs are not the primary driver of housing shortages—construction costs, zoning limits, and lack of developer incentives play a far greater role.

What we truly need are affordable housing incentives—things like grants, tax credits, fast-tracked permitting, or land-use support that make it financially viable for developers like myself to build housing that's actually affordable. Without subsidies or incentives, it is nearly impossible to deliver affordable housing in today's economic environment.

I urge the County to rethink the proposed regulations and instead work directly with us—STR owners—to create a more thoughtful, balanced solution. Every STR owner in this room would be happy to participate in that process. We care about this community, and we want to be part of a future that works for everyone.

Thank you for your time and thoughtful consideration.

Sincerely,
Ashley Gallacher
STR Owner & Developer – Packwood, WA

Verbal Testimony – Lewis County STR Regulations

Reference to written = Gallacher 2025

Good afternoon, Commissioners. My name is Ashley Gallacher, and I own a short-term rental in Packwood that has been in my husband's family for over 35 years. He grew up spending time there, and now our kids are fortunate to enjoy that same cabin. We rent it out to help cover costs like property taxes and maintenance—not to make big profits, but to preserve something deeply meaningful to our family.

There's a misconception that STRs are cash cows. They're not. Once we pay for local cleaners, handymen, maintenance, supplies, and taxes, we barely break even. This is not about getting rich—it's about being able to keep a family home while supporting the local economy.

STRs create jobs. I hire local cleaners and handymen and pay fair, strong wages. Visitors to my rentals support local restaurants, shops, and small businesses that rely heavily on year-round tourism. If STRs are overregulated, those jobs and local incomes are put at risk.

We also care about being good neighbors. Airbnb and similar platforms enforce strict guest policies, and we hold our guests accountable. Our homes are well maintained, and we work hard to ensure our properties are clean, safe, and respectful of the community. This is all in our best interest, as well as the communities.

And while I understand the concern about affordable housing, the truth is—regulating STRs won't solve that issue. For example, in San Diego, after passing some of the strictest STR rules in California, there was no measurable improvement in housing availability or affordability. What will help is offering ****affordable housing incentives****—like grants, tax breaks, faster permitting, or land-use support. I'm a developer, and I can tell you firsthand—it's nearly impossible to build affordable housing without subsidies. The costs are just too high.

So I urge the County to rethink these proposed regulations and instead work directly with us—STR owners—to create a smarter solution. Every STR owner in this room would be happy to participate. We care about this community, and we want to be part of a plan that actually works—for residents, workers, and visitors alike.

Thank you for your time.

Emily Garrison

3280 Vista Verde Ln. SW
Tumwater, WA 98512
emelized@gmail.com
(360)259-7589

July 7, 2025

Lewis County Planning Commission

c/o Mindy Brooks
351 NW North Street
Chehalis, WA 98532

Subject: The Vital Role of Short Term Rentals in Packwood

Dear Planning Commission Members and Ms. Brooks,

My name is Emily Garrison, and my family owns Mama Bear's Chalet at 107 Sherwood Ct. in High Valley 8, Packwood. I am writing with urgency and sincerity to ask you to **reconsider and substantially revise the proposed regulations on short term rentals (STRs)** that will directly impact our family, our community, and the economy of Packwood itself.

For us, Mama Bear's Chalet is not simply an investment—it's part of our family's story and a cornerstone of our connection to Packwood. We work full-time in Olympia, raising our three children, and maintaining a second home in Packwood would be impossible without responsibly offering it as a short term rental. The revenue from hosting helps us cover the costs of upkeep, taxes, repairs, and improvements.

More importantly, this income is shared widely in the local economy:

- **Local workers and small businesses depend on STRs.** Anna Clayton, a Packwood resident and owner of Mountain Mama's Cleaning Company, keeps our chalet clean and welcoming. Anna, a mother of three, employs other local residents. Our continued business sustains her livelihood and supports the families who work for her.
- **Local contractors and tradespeople rely on STR owners.** Over the years, we've hired Packwood's BJ and his team for snow plowing, tree work, and repairs. We buy supplies and equipment from local hardware stores and support local craftspeople.
- **Restaurants, shops, and services thrive because of STR guests.** Visitors frequent the Packwood Brewery, Blanton's Market, the local coffee shops, and small retailers. Our guests regularly leave glowing reviews and return to the area precisely because of the warm, authentic experience that Packwood offers.

If these regulations are enacted as proposed, it is very likely that our family—and many others—will be forced to sell our properties. This outcome would create a domino effect:

- Fewer families like ours able to keep their cabins.
- Fewer cleaning and maintenance jobs.
- Fewer tourists spending money locally.
- Lost tax revenue and declining economic vibrancy.

It's important to recognize that STRs are **not** the primary driver of housing affordability challenges in Packwood. Many of these properties were purchased precisely because they could be offset by seasonal rental income. If families are driven out, these homes will not automatically transform into year-round affordable housing. Instead, they will likely sit vacant, sell to second-home buyers who don't rent them at all, or be converted into other uses that contribute even less to the community.

My family has poured countless hours and heartfelt effort into making Mama Bear's Chalet a place where people can build memories. When my husband and I renovated the cabin, we did so with the intention of sharing it, welcoming guests who return year after year. From first-time skiers learning at White Pass to families gathering for the holidays, our guests leave with lifelong memories and a deep love for Packwood.

Regulating STRs with balance and fairness makes sense—but **excessive restrictions risk irreparable harm**. We believe Packwood deserves thoughtful policies that:

- Recognize STR owners as part of the community, not adversaries.
- Protect the local economy by sustaining jobs and businesses that depend on tourism.
- Support families who rely on STR income to keep their properties viable.
- Preserve the vibrancy and visibility that tourism brings to Packwood, especially in the off-season.

Packwood is a special place—some might say it is even more magical than Disneyland—and it deserves policies that reflect its unique character and needs. I respectfully ask that you **separate Packwood from a one-size-fits-all approach to STR regulation** and adopt measures that acknowledge the many ways STRs sustain local families and businesses.

On behalf of my husband, my children, our guests, and all the hardworking people whose livelihoods depend on this ecosystem, I urge you to **support responsible short term rentals** and protect the community that has welcomed us so warmly.

Thank you for your time and thoughtful consideration.

Sincerely,
Emily Garrison
Mama Bear's Chalet
107 Sherwood Ct.
Packwood, WA 98361
emelized@gmail.com
(360)259-7589

From: [Gina](#)
To: [Mindy Brooks](#)
Subject: STR's
Date: Monday, July 7, 2025 2:02:57 PM

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Dear Mindy,

We purchased our cabin near White Pass because of our deep love for the area and our desire to raise our children skiing and enjoying the outdoors. We use our cabin regularly in the winter months, and to help cover the costs, we rent it out as a short-term rental when it's not in use by our family.

Additionally, we donate nearly one weekend each month to charities that are close to our hearts, covering all expenses and cleaning fees ourselves. Even with this rental income, we continue to operate at a loss each year.

While I fully support a fair and reasonable licensing fee for short-term rentals, I am concerned about the growing amount of red tape and regulations being proposed. These added requirements, combined with increasing property taxes and fees, are putting significant financial strain on families like ours — to the point where we may be forced to sell a home that means so much to us.

I also want to point out that limiting the number of short-term rentals in the county could have unintended consequences, such as reducing the amount of lodging tax revenue that supports local programs and services. This funding is important for the county, and fewer STRs could mean less money going back into the community.

At the same time, I strongly support efforts to increase affordable housing. I believe the most effective approach is to encourage and incentivize builders who commit to affordable housing by relaxing certain density restrictions, offering rebates, reducing permit fees, expediting approvals, and exploring options like land trusts or grant programs for first-time buyers.

Rather than discouraging responsible short-term rental ownership, I urge the county to use licensing fees and occupancy taxes strategically to invest in these types of housing solutions.

Thank you for your time and for considering input from residents and families who care deeply about the future of this area.

Sincerely,

Gina Peterson

253 318-6314

Sent from my iPhone

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From: [Fireplace Lodging](#)
To: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [BOCC](#); [Mindy Brooks](#)
Subject: Submission of Public Testimony for STR Regulations
Date: Monday, July 7, 2025 2:35:39 PM
Attachments: [Lewis County Planning Commission Testimony on Proposed Short-Term Rental Regulations.pdf](#)

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Please find attached written testimony from one of your life-long constituents regarding the proposed STR Regulations for tomorrow's meeting. My apologies for the length of the document, but there is even more to say that I don't have time to cover! I would love to have a fireside chat with all of the commissioners to share about the stress that seems to be coming top-down from the County over the last few years. Alas, you are all very busy and I am too - homeschooling our 5 children and trying to stay afloat in this rough economy without taking government assistance - amid the continued pressure from suffocating, overreaching government. While that may be an emotional outburst, I trust in God to provide as He always does. May God help you all to govern with wisdom and grace.

Thank you,
Clarissa Hughes

--

Given to hospitality,
Stephen and Clarissa

Fireplace Lodging at Mt. Rainier
[Book Online](#)
[Facebook](#)
[Instagram](#)
fireplacelodging@gmail.com
+1-6575-CABINS

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July 7, 2025

Dear Planning Commission:

I am writing in opposition to the new code section, Lewis County Code 17.105, Short Term Rentals. I urge the Commission to not recommend adoption of the code section as proposed. After reading the proposed STR regulations and sitting in on the June 23 presentation at the community meeting, I have concerns that I'll do my best to summarize.

As I understand it the goal of the proposed regulation is to promote affordable housing. At the June 23 meeting the question was asked if there was data to back up whether imposition of STR regulations in other areas has had the desired impact on housing affordability. The answer, in short, was "no" that these regulations implemented in other communities have not been in place long enough to demonstrate impacts. It seemed there was "hope" that this would be the outcome – but hope is not a strategy. We all have our own story and this regulation will potentially have a direct impact in my situation – I may not build a residence. I have had a vacation home which I built (not currently STR) in Timberline since 2007. I also purchased the adjacent lot several years ago with the intent build another home on that lot which could be used as an STR or long-term rental for retirement income. Last year I was notified that I now have water availability for that lot and have until October 2026 to make a decision to connect to water. I was on a path to build – but not knowing if I will be able to use it as an STR is making me second guess that decision. The uncertainty of whether I can use it as an STR starting in 2027 will likely lead to not building. That's one less residence in the community. If that is the intended outcome of this regulation is that considered success? The question was also asked where the 25% cap came from. Again, no data to demonstrate that this percentage of allowed STR's will produce the desired outcome.

Fairness also seems to be an issue in parts of the proposed regulations. Imposing regulations surrounding garbage service and permits that would include ensuring properly operating septic systems I'm sure have good intent. The reality, however, is that imposing these only on STR's is not equitable. If sanitation is that big of a concern is there a broader discussion going on to implement such regulations across the entirety of county? Don't get me wrong – I believe you should take care of your trash and have a properly functioning septic system.

The planning commissions website has a document recommending strategies for written testimony. Step 3 is "Support your Statements. I would suggest that although this proposed regulation may be well intended, the county's position is not supported by data. Not only are desired outcomes not supported, but there will also likely be adverse impacts not

anticipated by the county. The proposed regulation, if implemented in its current form, will have known adverse impacts on property owners and local businesses. I urge you to not recommend approval of the proposed STR regulations.

Thank you for your consideration.

Brian Hurley
360.791.3760
b.hurley@me.com

5625 58th Ln NW
Olympia, WA 98502

197 Forest Ridge Dr
Packwood, WA 98361

From: [Lynda Jamysen](#)
To: [Mindy Brooks](#)
Subject: Packwood Planning Commission Public Hearing -Comments & Concerns
Date: Monday, July 7, 2025 12:30:50 PM

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To Whom It May Concern,

I am writing to express my strong opposition to the proposed regulations concerning short-term rentals (STRs) in Packwood.

While I understand the intent behind these changes, I believe they will ultimately create more problems than they solve and negatively impact our community and economy.

Many STR owners have operated successfully and responsibly for years without issues. These proposed regulations would unfairly disqualify longstanding property owners who have maintained their properties well and contributed to the local economy.

If septic system requirements are being changed, will existing STR owners be grandfathered in—especially when their current systems have no documented problems?

I am also concerned about the new parking requirements. If parking has not been a consistent issue in the past, why introduce restrictive regulations now? Similarly, the requirement to store garbage cans inside appears excessive, especially in the absence of complaints from the public.

Eliminating or severely restricting STRs will result in a flood of properties being placed on the market, potentially lowering property values across the area. This will have a ripple effect. While it may create some affordable housing, it will come at the cost of Packwood's primary economic driver—tourism. Without STRs to house visitors, local businesses will suffer, jobs will be lost, and the very need for affordable housing will diminish as the community's economy declines.

If we undermine the tourism economy in favor of affordable housing, we may end up with neither: no tourism, no jobs, and no demand for housing. This outcome would be damaging to both current residents and future generations.

This leads to several key questions:

- Will any new affordable housing be government-subsidized, or will private property owners bear the cost?
- How do you define "affordable housing," and how will it be implemented without jeopardizing local property ownership?
- Who will invest in property for long-term rental when doing so would result in a financial loss?

Given current property costs, renting at affordable rates is not sustainable for most owners. While affordable housing is important, forcing STR owners to take financial losses is not a viable solution.

A more balanced approach would be to allow the local market to determine the number of STRs needed, while directing affordable housing efforts toward nearby towns that are not tourism-dependent. This would preserve Packwood's tourism economy while still addressing broader housing needs.

Thank you for your time and attention to this matter. I respectfully ask that you reconsider these proposed regulations and work toward solutions that protect both the local economy and the integrity of our community.

Sincerely,
L. Jamysen

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From: [Anastasia Jazuk](#)
To: [Mindy Brooks](#)
Cc: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [ruskin jazuk](#)
Subject: STR Proposals- Testimony
Date: Monday, July 7, 2025 9:01:26 AM

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Hi Mindy,

First of all, thank you for your time. Below is my husband and I's written testimony and response to the proposed STR regulations. We sincerely hope they are considered and that the proposals are changed or disregarded entirely.

The regulations being proposed do not have any scientific evidence of helping with home pricing and supply or keeping people safe, which based on the regulations statement, are the goals. In fact, many of the regulations imposed create bigger issues for hosts trying to help their guests while not having any proof that they will assist in the goals set forth in the proposal. While the proposals on paper may sound like a good idea, in practice, they create more problems. Packwood has been and is a vacation town that people love to enjoy- and they should! The area is beautiful and it should be experienced and is connected to one of the most visited and incredible National Parks in the country. Tourism is part of the lifeblood of the town, and these regulations are more likely to hurt the economy, homeowners and those wanting to visit more than it will actually help the community. Additionally, Lewis County is one that always kept the rights of property owners in mind and these restrictions are a 180 from those values.

More research should be done prior to implementing any of the restrictions, however, here are some of the bigger counter points to specific restrictions:

(numbers relate to 17.105.040 Standards.)

1. Limiting STR's: This limit has no verifiable impact on improving housing supply or pricing. In fact, given the fact that Packwood is a hotbed for travelers, this could affect the housing available for travelers and therefore greatly impact the population in packwood that is employed by the STR economy. We employ no less than 10 locals for assistance in our hospitality business. Not being able to provide this service would quite literally take away the biggest income production for my cleaner, therefore her business and the many others she employs, all are local. This would change her life dramatically and would likely have a similar impact in cutting out business and the livelihood of the many other trades that are employed by the STR economy.

#3 on 17.105.040 and #2 on 17.105.030 (limiting guests based on bedrooms permitted and calling a detached bedroom a dwelling unit, respectively).

#3 (limiting guests based on permitted bedrooms): This is very limiting considering each home has its own unique circumstances. For example, some homes (like ours) may have a septic designed for 4 bedrooms, but have 3 built bedrooms. For owners who are creative and create an additional, suitable, detached sleeping space for the 2 additional guests, this rule would unnecessarily harm owners without providing any extra protections for visitors. This should be reconsidered entirely.

This also relates to #2 on 17.105.030 Allowance of short-term rentals. Calling a detached bedroom a dwelling unit is not reasonable as a detached bedroom wouldn't have a sink, toilet

or other similar amenities that people would expect for a dwelling and is not a dwelling unit. This is holding owners to a standard that doesn't make sense, hurts their businesses and visitors. This rule also wouldn't provide additional housing- it just takes options away from owners.

6: Requiring a local representative available 24 hours a day.

Having a local representative for guests to reach out to. This by and large will end up being the cleaners that any short term owner hires. They already have a lot going on and adding more to their load would slow down any response, including emergency response. As somebody who has a cleaner, their availability to help guests is actually much more limited than ours and this would slow down responses to guests if they were the set emergency contact. As owners/ hosts of the rentals, we are incentivized by airbnb and vrbo to respond to and take care of guests quickly. We also are better at triaging guests' needs and finding the best solution for them, whether that be a plumber, electrician, handyman or similar. This requirement is unnecessary and could cause delays in guests needs being met, especially when we already have systems in place for this. This just creates more headaches for locals, which surely wasn't the goal. Additionally, any true emergency is something that people should call 911 for.

7. Solid waste being required to be stored indoors

This limits owners to one solution when better options are available. For instance, having a dumpster for waste on site is equally an efficient solution.

6- 17.105.030

Not allowing weddings doesn't provide any additional protections for neighbors or visitors or assist in providing low cost or more available housing. What it does is take away opportunities for those wanting to have their special moment in a very special place. There are points that could be made for those hosting big weddings with neighbors too close by and not enough bathrooms or garbages or too much noise. Rather than just outlawing weddings, some rules should be implemented. Just banning them is too restrictive and takes away a great benefit for owners and guests with the potential of eliminating minimal harm.

It's worth noting that as providers of short term housing, we provide a service to so many who come to see the beautiful area. Visitors are already protected by existing laws and airbnb. These additional regulations are not helpful, are too restrictive and do not have any viable evidence of supporting the goals they are intended to achieve. The regulations being proposed do not help visitors or landlords and notably make things more difficult, rather than making things more safe.

We love Packwood and this is our future home. We plan to retire here and therefore also care about the local economy and housing as much as anybody and our interests are equally invested in the long term health of Packwood and our business. We would love to see these points be seriously considered and for the proposed regulations to be dropped until they are more thoroughly reviewed and revised in such a way that provides more help to the local economy than the harm it would cause as it is currently written.

We truly with all our hearts hope this feedback is considered and appreciate your time.

Anastasia Jazuk & Ruskin Jazuk.
360-970-5741

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Lewis County Planning Commission
c/o Mindy Brooks
Mindy.Brooks@Lewiscountywa.gov
Comments for July 8, 2025 meeting

Comments

About me:

I have worked and lived in Ashford since 1971, for fifty-four years.

I am 71 years of age, single and the full-time care provider for my 48-year-old permanently disabled wheelchair bound adult son. My small business has allowed me to work at home and care for my disabled son.

I opened Almost Paradise Lodging as a bed & breakfast twenty-six years ago, June 1999, with one bed & breakfast unit on my home/residence property, soon adding two more B&B units onsite. In subsequent years I added two off-site nightly rentals.

With increased age I've found I'm not able to accomplish what I used to, therefore I decided to downsize. A few years ago, I turned one of my nightly rentals into a monthly rental to accommodate a family member. I then sold the other offsite rental property.

The income from the monthly rental is barely covering its increased property taxes, insurance, HOA dues and maintenance expenses. If it weren't for a family member with a young family living there, I would sell that property. The monthly rental income is marginally profitable.

Since 1999 I have paid various license fees, collected and paid taxes to the benefit of various county and state government entities.

I collect and pay state and county sales taxes.

I pay B&O taxes.

I have a business license.

I have a transient accommodation license.

I have a Class B water system.

I have a compliant septic system.

Now it appears there is the possibility of my livelihood being limited and/or stopped because the Lewis County government has decided to rezone this area to limit the number of transient rentals, now called STR's.

At 71 years of age, with a disabled dependent, I am not able to change my job for a different income source. I would be forced to sell our long-time family home of 43 years, which my son has called home for almost his entire life. My now deceased spouse and I built our home from scratch with our own hands.

About the Ashford area:

Ashford is a small town with little infrastructure. It's a small tourist town with people traveling through to visit Mt. Rainier National Park, with the busy/peak season being from June to September. Most restaurants close for lack of business during the slow/off season. One or two restaurants attempt to stay open year-round, with shortened days/hours of operation. There is one gas station and two small convenience stores with high prices. Locals need to travel to larger cities for medical care, vehicle services, legal services, most all shopping, etc.

There are few available jobs in the area and those jobs are usually seasonal. Housekeeping, waitressing, some maintenance. Most jobs in Mt. Rainier National Park are seasonal. Some of us seasoned lodging owners have managed to adapt and make a comfortable living during the busy summer season and slow season weekends.

The attempt to force some property owners to turn their property/homes into monthly rental units is wrong and will be a hardship on those owners who have depended on their transient rental income to support their families. It is not financially feasible to change to monthly rentals with the outrageously increased assessed property values, which in turn has raised property taxes, not to mention increased insurance premiums.

Regarding property assessed valuation and property tax increases:

Please explain why my property valuation has almost doubled in the past couple of years? I have consulted with a highly respected and successful real estate agent.

Re: Real estate agent:

"I wanted to share this report with you, which is automatically generated through the MLS and provides a market analysis based purely on actual sales data—without any human bias or manipulation. In my experience, this system is typically very accurate when reflecting true market value in our area.

After reviewing the county's assessed value on your property, I'm genuinely concerned. The value they're using for taxation purposes appears significantly inflated and does not align with any comparable sales. There are no recent comps that support this valuation, especially given the current market conditions. The real estate market in this area has notably cooled over the past year, and higher-priced parcels are no longer selling at the pace or prices they were previously.

There is no reasonable explanation for your property's value to have nearly doubled in just one year. This assessment does not reflect a fair market value and seems inconsistent with both the data and current trends."

I don't believe I could sell my home/property for the county's assessed value. The property tax has almost doubled! The property tax is nearly \$20,000 per year! If/when I have only social security as an income source, I will not be able to pay this inflated tax.

I've worked my entire adult life to have my home and property...to now think I may need to sell it because I can't afford the property taxes, insurance, maintenance, etc. on a fixed senior income is outrageous!

Off subject, yet not really, is there someone who can direct and assist me with the process to dispute the valuation and request a reassessment of the assessed value of my property?

Thank for your consideration,

Carol Kirsten
Almost Paradise Lodging
360-569-2540
carolkirsten@centurytel.net
carolkirsteniam@gmail.com

From: [Kyle Lewis](#)
To: [Mindy Brooks](#)
Subject: Public comments
Date: Monday, July 7, 2025 9:07:10 AM

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Hello Mindy

I would like to submit a public comment for the July 8th STR meeting which you will find below. Let me know if I need to do anything else. Thanks!

To the Lewis County Planning Commission,

Thank you for the opportunity to submit comments on the proposed short-term rental regulations.

My name is Kyle Lewis, and I am the owner of a small cabin in Ashford. After reviewing the draft regulations and listening to the recent Planning Commission meeting, I would like to respectfully raise one specific concern:

The requirement for a modern septic permit as a condition of short-term rental approval.

In Section 17.105.050(2)(b) of the proposed code as written, it states that a short-term rental must have a “permitted and properly functioning” septic system.

While I understand and support the intent behind this provision, ensuring health, safety, and environmental protection, its current wording may create serious unintended consequences for owners of older, well-maintained properties and is very unusual compared to other counties in Washington.

During the recent Planning Commission meeting, the presentation clearly communicated that the county’s goal is to ensure septic systems are functioning properly and being regularly maintained. In response to a question from another community member, it was stated that older, unpermitted septic systems would be acceptable as long as they pass inspection and do not need to be permitted. This approach is thoughtful and reasonable, and it reflects the Commission’s intent to prioritize safety without imposing unnecessary burdens on long-standing homeowners.

I would recommend:

- **Allow septic inspections and records of regular maintenance to serve as sufficient proof of a safe and functioning system, regardless of its original permitting status.**

OR

Base occupancy guidelines on submitting floorplans

This change would bring the written policy into alignment with the guidance provided at the public meeting and consistent with how other counties handle this.

An example is from a nearby county follows:

"An O&M inspection of the on-site septic system (OSS) will be required prior to the submittal of the initial vacation rental application or more frequently as determined by the Pacific County Health Officer. O&M inspections are performed by a third party inspector licensed by Pacific County and are completed to ensure the system is functioning properly"

Thank you again for your time and for your commitment to thoughtful and balanced regulation.

Sincerely,
Kyle Lewis

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July 7, 2025

Planning Commissioners,

I am writing to share my concerns regarding the proposed *UGA Small Towns development regulations (Chapter 17.17)*.

Several of the provisions (including, but not limited to, those listed below) are overly prescriptive and go well beyond what the county should require of property owners:

- All primary structures shall have at least two roof pitch lines. Flat roofs are permitted when architectural features give the appearance of a sloped roof.
- Exterior building materials, including walls, garage doors, roofs and fences, shall match the following color palette. Applicants shall submit with any development application a color sample with an assigned Light Reflectance Values (LRV) and Munsell value for every color used on the subject buildings or structures.
- Drive-through establishments are prohibited within Packwood
- Interior illuminated signs are prohibited, except gas station signs. Reflective signs, such as mirrored glass or polished metal, are prohibited
- bicycle parking spaces shall be provided with bike racks, bike lockers, or similar parking facilities and shall be located in a visible, well-lit ground-level area that is conveniently accessible to the primary entrances of a development's principal building(s).
- Parking lots shall include at least one (1) tree and three (3) shrubs for every four (4) parking spaces.
- At least 80 percent of first floor facades of building fronting public rights-of-way as shall be natural wood, stone or veneer that resembles natural wood or stone;
- Spaces between structures are required to have exterior lighting. Lighting shall be shielded.
- An attached or detached garage or carport shall not extend forward of the front wall of any primary structure.

This is problematic for several reasons:

First, Overreach:

The county has no legitimate cause to exert this kind of power over property owners.

- There is no identifiable harm in staying with the current freedom which is part of property ownership.
- There is no substantial public interest in adding these new burdens and prohibitions on property owners.
- "Tidiness" is insufficient for the use of force on citizens regarding their property use.

Second, Higher Costs:

These added requirements undermine efforts to maintain affordable housing and a reasonable cost of living in Packwood.

- Imposing additional design standards and restrictions raises the cost of any project.
- Limiting options and creating scarcity invariably drives prices higher.

Third, Unfair Application of County Effort:

These rules and the additional related expectations are an unfair use of county power.

- It is inequitable to impose these special demands on selected properties while leaving others untouched.
- It is unfair for the county to invest in enforcement and scrutiny of items like paint color when county resources on critical functions are already stretched thin.

I urge you to direct staff to remove these provisions—and any others like them—that attempt to regulate style, culture, or other intangible preferences.

Sincerely,

Jami Lund
160 Wakefield Dr
Centralia, WA 98531

Letter to Lewis County Commissioners

Stephanie Maulding
3999 SW Myrtle St
Seattle, WA 98136
samaulding@comcast.net

(206)571-3999

July 02, 2025

Lewis County Board of Commissioners
351 NW North Street
Chehalis, WA 98532

Dear Commissioners,

I'm writing to express my concern regarding the proposed cap on short-term rentals (STRs) in Lewis County, especially in Packwood. I recently purchased a home in Packwood with the intent to operate it as a short-term rental. While I understand the desire to address local housing needs, I respectfully urge the County to avoid strict caps that could unintentionally reverse the economic progress this community has worked so hard to rebuild.

Packwood's History Underscores the Risk of Limiting STRs

Between the 1990s and 2010, Packwood suffered serious economic losses:

- The closure of the Packwood Lumber Mill in 1998 led to 220 lost jobs.
- By 2000, the population had declined to ~645 as the elementary school and pharmacy closed.
- In 2003, the U.S. Forest Service Ranger Station shut down.
- By 2010, the town's population had fallen to just ~324 residents.

In the years since, Packwood has been on the path to recovery—driven largely by tourism. From 2010 to today:

- Tourism increased dramatically, with the population rebounding to ~900 by 2017.
- Visitor check-ins at the Packwood Visitor Center jumped from 1,903 in 2019 to nearly 8,000 in 2022.
- Mount Rainier trips originating from Packwood grew from 98,000 (2019) to over 114,000 (2021).

This resurgence would not have been possible without STRs, which have provided the lodging infrastructure necessary to accommodate visitors and sustain our seasonal economy. Limiting them now could halt this momentum and put Packwood at risk of decline

once again.

A Better Path Forward: Balanced Solutions

Rather than limiting STRs through broad caps, I urge the County to consider these more targeted and constructive strategies:

1. Create Incentives for Workforce Housing Development

Encourage builders to create long-term rental housing through tax breaks, increased zoning flexibility, and reduced permitting costs.

2. Establish a Housing Trust Fund

A modest STR licensing fee could fund a local trust to support down payment assistance, rent subsidies, and development of affordable housing.

3. Prioritize STR Licenses for Local Owners

Grant license priority to Lewis County residents or property owners, ensuring that STR benefits remain in the community.

4. Allow More Diverse Housing Types

Rezone for ADUs, duplexes, and small-scale multi-family housing near the town center to expand long-term housing supply without harming rural character.

Let's Not Undermine What's Working

Short-term rentals have brought life back to Packwood—supporting dozens of local jobs, stimulating business growth, and restoring property values. Rather than dismantling this progress, let's build on it while addressing housing concerns with smart, targeted policy.

Thank you for your time and your commitment to our community. I'd welcome the opportunity to be part of a working group or community discussion around balanced, forward-thinking solutions.

Sincerely,
Stephanie Maulding

From: [Mount Rainier Business Alliance](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Mt. Rainier Business Alliance Response to Lewis County Short Term Rental Regulations
Date: Monday, July 7, 2025 10:33:53 AM

You don't often get email from mrba@mt-rainier.com. [Learn why this is important](#)

Dear Commissioners,

On behalf of the Mt. Rainier Business Alliance, thank you for your continued service to Lewis County. We recognize the challenges of governing in a region that is growing, evolving, and facing hard conversations about housing, tourism, and community identity.

We're writing today with deep respect and a clear request: please do not implement the proposed short-term rental (STR) regulations as currently written. Instead, we urge you to invite STR owners and operators into the conversation. Many are eager to share their perspectives, understand the county's concerns, and work together to craft a more balanced, effective approach.

Our membership includes business owners and operators in Mineral and the Lewis County side of Ashford. Among them are retired couples, families raising children, professionals with STRs as side income—and importantly, small business owners for whom short-term rentals provide a pivotal client base to include restaurants, art galleries, and retail establishments. These are neighbors who have poured their resources and time into welcoming visitors to Lewis County all year long. They operate legally, pay taxes, and are deeply invested in the long-term well-being of the community.

To remain competitive in today's travel market, STR owners must continually invest in their properties. That investment supports a wide network of local jobs: housekeepers, electricians, landscapers, photographers, septic professionals, and tradespeople. Many STRs rely on septic systems that require regular maintenance and compliance. These owners hire locally, pay fairly, and reinvest in the community. Their guests shop at area markets, fill up at local gas stations, and support restaurants, coffee shops, and shops from Ashford to Packwood.

These businesses support real people—not just in theory, but in very practical, day-to-day ways. Across Packwood, Ashford, and Mineral, there are housekeepers who rely on weekly turnovers to pay their bills. Some have built their own small businesses, cleaning multiple cabins a week. Others work part-time while raising kids or caring for family. Their income depends on bookings. They buy supplies locally, schedule around guests, and count on STRs to stay operational. If half the cabins they service were shut down, their income could vanish overnight.

And it's not just housekeepers. Electricians, septic professionals, and local tradespeople all rely on steady STR operations for year-round work. These are skilled workers whose livelihoods are quietly intertwined with the tourism economy. They may never speak at a public hearing, but they will feel the impact if the STR inventory is drastically reduced.

STRs also generate measurable public benefit. They pay significantly higher property taxes than residential homes. They contribute lodging tax dollars that fund nonprofit tourism initiatives and destination marketing. If the current proposal is adopted, Lewis County could

lose more than half of its STR inventory. That's not just a reduction in lodging—it's a disruption to the economic engine that supports small businesses across this region.

Lewis County already competes with neighboring counties—Thurston, Pierce, and King—all of which outspend us in tourism promotion. If these regulations move forward as drafted, Lewis County will have fewer lodging options, lower tax revenue, and fewer tools to bring visitors in. That's a long-term setback that will be hard to reverse.

We ask you to pause. Invite STR operators, business owners, and local workers into the room. Let's listen to each other and co-create policies that address housing pressures without dismantling a vital part of our rural economy. STR owners and the people they support are already working for the economic good of this county. Please give them a seat at the table before decisions are made without their input.

With respect and appreciation,

Mt. Rainier Business Alliance

External Email - Remember to think before you click!

This message may contain links with malware, viruses, etc. Please ensure the message is legitimate before opening it.

Land Use Summary

Questions/comments

LCC 17.42.017

17.42.017 Minimum lot size summary.

Except within an Small town urban growth area, See Table 1 **which** includes the minimum lot size requirements of this section. **Alternatively end sentence at Table 1.**

17.42.020 Land Use Summary

See Table 2 of this section. **In table heading, is "UGA" thee same as "UGA-City" If so, relabel as such. This table is getting very lengthy, but works for me, as all uses in all zones is presented in one place.**

Footnotes to table 2

Footnotes

- 1 Multifamily residential housing, which is three (3) or more dwelling units per parcel, is allowed if there is a centralized wastewater treatment facility with adequate capacity. In LAMIRDS, no more than four (4) dwelling units per parcel is allowed. **What about centralized water?**
- 2 In the Residential High (RH) zone, new accessory dwelling units are permitted if there is an existing primary single-family residence dwelling on the lot. **Only if there is no sewer available. Reasoning: If there is a single single family use on the site, it is a grandfathered use as this zone is not designed for single family and the single family aspect should not be expanded.**
- 3 New single family residential dwellings are allowed in the Rural High (RH) and Mixed Use (MU) zones if there is no sewer available within 200 feet of the parcel. **Single family allowance if for a "holding zone" aspect only. Allowing something on site even though it is not appropriate in this zone.**
- 4 New single family residential dwellings and outbuildings such as a garage associated with a single-family residence dwellings are allowed in the Mixed Use (MU) zone as live work, pursuant to 17.17.250

Multifamily

Questions/comments

LCC 17.142.160

17.142.160 Multifamily housing in LAMIRDs.

(1) Multifamily housing is only allowed in LAMIRDs that have centralized water and wastewater facilities that are able to accommodate the density of the units. Is there a definition of centralized water and wastewater facilities? For example, I believe that a LOSS with a number of septic tanks is a centralized wastewater facility as long as the system is covered under a single ownership or maintenance agreement as long as it serves 7 or more units. Can a centralized wastewater treatment facility be privately owned?

(2) The density of a multifamily housing development shall not exceed four (4) units per lot 24 units per acre. It is not possible to have multi family housing on a single lot if 1 above is true.



1201 3rd Ave Suite 2200, Seattle, Washington 98101
p. (206) 343-0681
futurewise.org



July 3, 2025

Lewis County Planning Commission
c/o Mindy Brooks
351 NW North St
Chehalis Washington 98532

Dear Planning Commissioners and County Staff:

Subject: Comments on Lewis County's proposed development regulations update.
Sent via email to: mindy.brooks@lewiscountywa.gov

Thank you for the opportunity to comment on Lewis County's proposed development regulations update. Futurewise supports the development regulation update. This letter will first summarize our comments and then provide more detailed comments and recommendations.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State including Lewis County.

Summary

- Futurewise recommends that Lewis County Code (LCC) 17.142.160(1) be amended to limit multi-family housing in Limited Areas of More Intense Rural Development (LAMIRDs) to those areas with existing sewer service. Please see page 2 of this letter for more information.
- The Growth Management Act requires Lewis County to adopt water quantity regulations as part of the 2025 comprehensive plan and development regulations update. Please see page 2 of this letter for more information.
- Development regulation amendments are needed to implement the resiliency element and comply with RCW 36.70A.070(9)(e). These amendments are needed to protect people and property from increasingly severe natural hazards such as increased flooding. Please see page 5 of this letter for more information.



Comments on Lewis County Code 17.142.160 Multifamily housing in LAMIRDs

Engrossed Senate Bill 5471, adopted as Laws of 2025 Ch. 386, in Section 1(1)(b) provides that the county “development regulations must ... (iii) Require that middle housing in limited areas of more intensive rural development be served by existing sewer service.” This bill will take effect on July 27, 2025. You can find the bill at this link: <https://lawfilesext.leg.wa.gov/biennium/2025-26/Pdf/Bills/Session%20Laws/Senate/5471.SL.pdf?q=20250703170209>

Lewis County Code (LCC) 17.142.160(1) does not limit the multi-family housing to areas with “existing sewer service.” We recommend that LCC 17.142.160(1) be amended to limit multi-family housing in LAMIRDs to those LAMIRDs with existing sewer service. Our recommended addition is underlined below.

(1) Multifamily housing is only allowed in LAMIRDs that have centralized water and wastewater facilities that are able to accommodate the density of the units. The waste water facilities to serve the multi-family housing must have existed on July 27, 2025.

The Growth Management Act requires Lewis County to adopt water quantity regulations as part of the 2025 comprehensive plan and development regulations update.

RCW 36.70A.070(1) provides that “[t]he land use element shall provide for protection of the quality and quantity of groundwater used for public water supplies.” RCW 36.70A.070(5)(c)(iv) provides that “[t]he rural element shall include measures that apply to rural development and protect the rural character of the area, as established by the county, by: ... Protecting surface water and groundwater resources.” The Growth Management Act (GMA) in RCW 36.70A.590 also provides that:

For the purposes of complying with the requirements of this chapter [the GMA] relating to surface and groundwater resources, a county or city may rely on or refer to applicable minimum instream flow rules adopted by the department of ecology under chapters 90.22 and 90.54 RCW. Development regulations must ensure that proposed water uses are consistent with RCW 90.44.050 and with applicable rules adopted pursuant to chapters 90.22 and 90.54 RCW when making decisions under RCW 19.27.097 and 58.17.110.

Development regulations must comply with the GMA including these requirements.¹ These development regulations are required because overuse of surface or ground water often harms senior water rights holders and fish and wildlife habitat. For example:

Increasing demands for water over time, from ongoing population growth, agriculture, and other consumptive uses as well as associated land use practices, have resulted in lower streamflows and declining groundwater levels in some areas. These decreases have impacted important resources for fisheries and general stream health. The impacts of climate change in WRIs 22 and 23 are also yet to be fully realized. However, it is apparent that water availability is limited throughout the Chehalis Watershed.²

The word “limited” overstates the available water. According to Ria Berns, who manages the Washington State Department of Ecology's Water Resources Program, “[e]ven when there is enough snowpack and enough water flowing through Washington's rivers and streams, it's all spoken for ...”³ All of the state's waters are already allocated.

To comply RCW 36.70A.070(1), RCW 36.70A.070(5)(c)(iv), and RCW 36.70A.590, the development regulations should adopt regulations to ensure development complies with the water codes, the applicable instream flow rules, the watershed plan updated under RCW 90.94.020.

RCW 36.70A.590 requires the policies and development regulations to ensure that proposed water uses are consistent with RCW 90.44.050. To comply with RCW 90.44.050 for residential permit exempt wells, the policies and development regulations must require that the County when determining if a development, land

¹ *Kittitas Cnty. v. E. Washington Growth Mgmt. Hearings Bd.*, 172 Wn.2d 144, 164, 256 P.3d 1193, 1203 (2011) citing RCW 36.70A.130(1); accord RCW 36.70A.290(2).

² State of Washington Department of Ecology Water Resources Program, *WRIA 22 & 23 Chehalis Watershed Water Availability* p. 3 (Publication 20-11-022 Revised Sept. 2022) last accessed on April 21, 2025, at:

<https://apps.ecology.wa.gov/publications/documents/2011022.pdf> and at the link on the last page of this letter with the filename: “2011022.pdf.”

³ Conrad Swanson, *Trump keeps talking about taking PNW water — is that possible?* *The Seattle Times* (Updated Feb. 23, 2025 at 7:00 am) last accessed on April 21, 2025, at: <https://www.seattletimes.com/seattle-news/climate-lab/trump-keeps-talking-about-taking-pnw-water-is-that-possible/> and at the link on the last page of this letter with the filename: “Trump keeps talking about taking PNW water is that possible.pdf.”

division, or use qualifies for a permit exempt well under RCW 90.44.050 to ensure that the water used by the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002 on those lots does not in total exceed the 5,000 gallons a day allowed by RCW 90.44.050. Under the State Supreme Court's *Campbell and Gwinn* decision, each lot is entitled to one 5,000 gallon per day permit exempt withdrawal for single or group domestic uses under RCW 90.44.050.⁴ A "developer may not claim multiple exemptions for the homeowners."⁵ So each lot that existed in 2002, the year the *Campbell and Gwinn* decision was decided, is entitled to one permit-exempt withdrawal under RCW 90.44.050.

As lots are subdivided or developed over time, part or all of the permit exempt withdrawals are used by the lots created or the development authorized. To qualify for a permit-exempt groundwater withdrawal authorized under RCW 90.44.050, the lot must have some remaining water from the parent parcel's single 5,000 gallon per day permit exempt withdrawal for single or group domestic uses.

Therefore, the required development regulations can only authorize the use of a permit exempt-well or well system for single or group domestic uses if the water use does not exceed the 5,000 gallons a day allowed by RCW 90.44.050 including the parent parcel that existed in 2002, any lots created from the parent parcel, and any development built on or after 2002. To comply with RCW 36.70A.590, the proposed policies and development regulations must include this important limitation. Therefore, we recommend the water quantity development regulations comply with the applicable state water laws including limiting each lot that existed in 2002 to one permit-exempt withdrawal under RCW 90.44.050 including the water used by any land divisions or developments and also comply with RCW 36.70A.590.

This regulation also helps to protect families that buy lots and houses that rely on permit exempt wells. Developments that are approved in violation of RCW 36.70A.590 and RCW 90.44.050 do not have a legal water right. Their current and future water use is not legal.

⁴ *State Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 14, 43 P.3d 4, 110 (2002).

⁵ *Id.*

Development regulation amendments are needed to implement the resiliency element and comply with RCW 36.70A.070(9)(e).

As part of the 2025 comprehensive plan update, Lewis County is required to adopt a resiliency subelement.⁶ RCW 36.70A.070(9)(e)(i) provides in relevant part that:

The resiliency subelement must prioritize actions that benefit overburdened communities that will disproportionately suffer from compounding environmental impacts and will be most impacted by natural hazards due to climate change. Specific goals, policies, and programs of the resiliency subelement must include, but are not limited to, those designed to:

- (A) Identify, protect, and enhance natural areas to foster resiliency to climate impacts, as well as areas of vital habitat for safe passage and species migration;
- (B) Identify, protect, and enhance community resiliency to climate change impacts, including social, economic, and built environment factors, that support adaptation to climate impacts consistent with environmental justice; and
- (C) Address natural hazards created or aggravated by climate change, including sea level rise, landslides, flooding, drought, heat, smoke, wildfire, and other effects of changes to temperature and precipitation patterns.

Complying with these requirements will require new and amended regulations especially to protect and enhance natural areas, to protect and enhance community resiliency, and to address the natural hazards. For example, the

The County's highest risk hazard is flooding. There are over 5,500 buildings within the 1% annual chance floodplain, exposing about 20% of the economic value of the county.

However, not all of these buildings are highly vulnerable to flooding. Buildings that have their floor elevated above flood waters will sustain less damage. Over time these buildings as well as buildings

⁶ RCW 36.70A.070(9)(c).

Comments on Lewis County's proposed development regulations update.
July 3, 2025
Page 6

current outside of the 1% chance floodplain will become more vulnerable as flood discharges increase and flood levels rise.⁷

Development regulations are necessary to address rising and expanding flood plains and other hazards created or aggravated by climate change.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich
Director of Planning & Law

Enclosures at the following link:

<https://futurewiseorg.sharepoint.com/:f:/g/EvssmbmIn2ZFpTopKYJyA94Bf95jJxz8Fc5DST7GEwhAvw?e=IfqL5H>

⁷ Lewis County Emergency Management, *Natural Hazards in Lewis County* story map last accessed on April 21, 2025, at: <https://lewiscountywa.gov/departments/emergency-management/2023-lewis-county-hazard-mitigation-plan-update/>. See also the climate change increases in the County's flood plain shown on page 101 of the Pertteet, *Draft Lewis County Hazard Mitigation Plan Update Volume 1: Planning-Area-Wide Elements* (March 2024).



TransAlta Centralia
Generation LLC
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Cody Duncan
Manager: Admin, Growth & Development
Direct Line: (360) 807-8049
Email: cody_duncan@transalta.com

July 7, 2025

Mindy Brooks
Director, Community Development - Lewis County

Lewis County Comprehensive Plan Update- Comments

Dear Mrs. Brooks,

In response to the Lewis County Comprehensive Plan Periodic Update Materials, TransAlta would like to submit the following comments/proposed changes for review by the Commission. Please don't hesitate to reach out if there are any questions or concerns.

17.127.100 Solar Power Production Facilities

- (2) Solar Energy Facilities shall not be allowed on sites or portions of sites with an existing average slope greater than seven percent (7%). Each solar energy facility submitted for permit consideration shall include a full topographic survey of the site with 2-foot contour intervals. The topographic survey shall delineate all portions of the site greater than 7-percent slope.

TransAlta's Response: *We request that the code above be changed to "Solar Energy Production Facilities shall comply with manufacture specifications concerning allowable slope tolerance or shall grade the site into compliance"*

TransAlta's Reasoning: *The 7% slope threshold proposed in the new code is well within the tolerances of industry standard racking equipment. The industry has regularly been constructing on slopes up to 15% using tracking systems and 30% slope using fixed tilt systems. Some of the best solar resource is located on south facing hills (which yields more hours in direct sunlight) and we would not want to preclude these sites from development in Lewis County. New advances in Solar racking are always being made allowing solar on steeper hillsides. The suggested code will allow Lewis County to keep up to date advanced in racking technology*

17.127.100 Solar Power Production Facilities

All equipment associated with the facility shall not exceed a maximum of 20 feet in height as measured from grade at the base of the equipment to its highest point during operation, as shown in Figure 1.

TransAlta's Response: We request the code above be changed to *"All equipment shown in Figure 1 shall not exceed a maximum of 20 feet in height as measured from grade at the base of the equipment to its highest point during operation."*

TransAlta's Reasoning: We believe that the intent here is to limit the panel structures (shown in Figure 1) to 20ft and want to avoid any confusion about this language of "all equipment associated with the facility" extending to the substation and transmission lines associated with the project. For safety reasons (Lightning protection and Electrical Code) the transmission poles and substation shield wires need to be taller than 20ft.

17.127.040 General Standards

- (1) Screen and buffering. Screening around the perimeter of the site must be provided. Screening may include fences, walls, vegetation, earth berms with vegetation, or a combination of these or other methods. The screening must be at least eight (8) feet high. Fences and walls shall be articulated by at least two (2) feet in depth, or a shrub or tree shall be planted every 25 feet, of fence or wall length. When vegetation is used, it must obscure at least 80 percent visibility of all equipment and structures as seen from rights-of-way and adjacent properties. The use of vegetation as screening and buffering is prohibited within 20 feet of any facilities or equipment associated with Battery Energy Storage Systems.

TransAlta's Response: We ask that MID or RAI zoning be exempt from vegetation screening requirements (fence only) as they are zoned for industrial areas where vegetation screening may not be needed.

Thank you,

TRANSALTA Centralia Generation LLC



CODY DUNCAN
Manager: Admin, Growth & Development

July 7, 2025

Planning Commissioners,

I am writing to share my concerns regarding the proposed *UGA Small Towns development regulations (Chapter 17.17)*.

Several of the provisions (including, but not limited to, those listed below) are overly prescriptive and go well beyond what the county should require of property owners:

- All primary structures shall have at least two roof pitch lines. Flat roofs are permitted when architectural features give the appearance of a sloped roof.
- Exterior building materials, including walls, garage doors, roofs and fences, shall match the following color palette. Applicants shall submit with any development application a color sample with an assigned Light Reflectance Values (LRV) and Munsell value for every color used on the subject buildings or structures.
- Drive-through establishments are prohibited within Packwood
- Interior illuminated signs are prohibited, except gas station signs. Reflective signs, such as mirrored glass or polished metal, are prohibited
- bicycle parking spaces shall be provided with bike racks, bike lockers, or similar parking facilities and shall be located in a visible, well-lit ground-level area that is conveniently accessible to the primary entrances of a development's principal building(s).
- Parking lots shall include at least one (1) tree and three (3) shrubs for every four (4) parking spaces.
- At least 80 percent of first floor facades of building fronting public rights-of-way as shall be natural wood, stone or veneer that resembles natural wood or stone;
- Spaces between structures are required to have exterior lighting. Lighting shall be shielded.
- An attached or detached garage or carport shall not extend forward of the front wall of any primary structure.

This is problematic for several reasons:

First, Overreach:

The county has no legitimate cause to exert this kind of power over property owners.

- There is no identifiable harm in staying with the current freedom which is part of property ownership.
- There is no substantial public interest in adding these new burdens and prohibitions on property owners.
- "Tidiness" is insufficient for the use of force on citizens regarding their property use.

Second, Higher Costs:

These added requirements undermine efforts to maintain affordable housing and a reasonable cost of living in Packwood.

- Imposing additional design standards and restrictions raises the cost of any project.
- Limiting options and creating scarcity invariably drives prices higher.

Third, Unfair Application of County Effort:

These rules and the additional related expectations are an unfair use of county power.

- It is inequitable to impose these special demands on selected properties while leaving others untouched.
- It is unfair for the county to invest in enforcement and scrutiny of items like paint color when county resources on critical functions are already stretched thin.

I urge you to direct staff to remove these provisions—and any others like them—that attempt to regulate style, culture, or other intangible preferences.

Sincerely,

Jami Lund
160 Wakefield Dr
Centralia, WA 98531

July 7, 2025

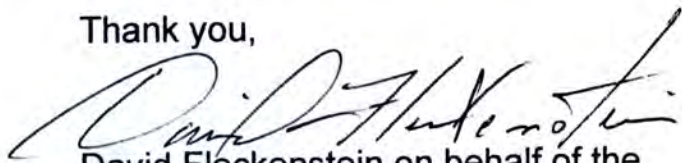
Dear Lewis County Planning Commissioners;

Thank you for the opportunity to provide testimony on the proposed Short Term Rental regulations, which are part of the Lewis County Comprehensive Plan Periodic Update. The Packwood Community Advisory Committee (CAC) would like to provide the following points for the Planning Commission's consideration:

1. The CAC spent significant time developing the proposed STR regulations for the Packwood Urban Growth Area (UGA) (see attachment 1). Discussions occurred from 2022 through today and included several opportunities for public input. Those opportunities to make sure the Packwood community was informed and able to provide input included two public forums, three open houses and one online survey. Hence, we feel the CAC-proposed regulations are appropriate for the Packwood UGA and should be adopted.
2. The CAC did not discuss application of the CAC-proposed STR regulations outside of the Packwood UGA boundary and cannot speak to the application of those regulations outside of the Packwood UGA without further analysis.
3. The CAC has not discussed the additional regulations that are proposed by the Planning Commission, such as the 25% cap, for application within the Packwood UGA and therefore cannot support those at this time.

The CAC recommends that the Planning Commission forward the CAC-proposed STR regulations for application within the Packwood UGA to the Board of County Commissioners for consideration.

Thank you,

A handwritten signature in black ink, appearing to read "David Fleckenstein".

David Fleckenstein on behalf of the
Packwood Community Advisory Committee

Attachment 1

Proposed Short Term Rental Regulations

Proposed Short Term Rental (STR) regulations as agreed upon by the Packwood Community Advisory Committee(CAC) and sent to the Planning Commission:

17.17.210 Short Term Rentals

- (1) Purpose. The purpose of this chapter is to ensure that short-term rentals are not having a significant impact on housing supply in Lewis County and are operated in a manner that protects public health and safety, while also encouraging the economic benefits of tourism.
- (2) Applicability. This chapter applies dwelling units or portions thereof that meet the definition of "short-term rental" in section 17.10.170.
- (3) Allowance of short-term rentals. Short-term rentals are allowed as described in chapter 17.42, Table X, Land Use Summary with the following limitations:
 - (a) Multifamily housing may not be provided as short-term rental, except if the requirements of 17.17.215(1) have been met.
 - (b) Where there is a primary dwelling unit and one accessory dwelling unit on a single parcel, only one dwelling may be provided as short-term rental. Where there is a primary dwelling unit and two accessory dwelling units on a single parcel, only two dwellings may be provided as short-term rental.
 - (c) Short-term rentals shall not be operated outdoors, such as a tent or treehouse, except as allowed in an RV park or campground.
 - (d) Recreational vehicles or yurts shall not be provided as short-term rentals except those that are permitted as a residence or as allowed in a RV park or campground.
 - (e) Short-term rentals shall not be used for commercial events, such as a wedding venue.
- (4) Standards.
 - (a) The short-term rental shall be permitted as a residence.
 - (b) A minimum of one on-site parking space per bedroom shall be provided.
 - (c) The owner or legal representative shall obtain a short-term rental permit from Lewis County Department of Community Development.
- (5) Permit issuance.
 - (a) The short-term rental permit shall be processed as a Type I application.
 - (b) To obtain a permit, the property owner or legal representative shall demonstrate that all of the following are met:
 - (i) There are working smoke and carbon monoxide detectors and properly maintained and charged fire extinguisher on the premises.

Attachment 1 (Continued)
Proposed Short Term Rental Regulations

- (ii) There is a permitted and properly functioning septic system or sewer connection.
- (iii) There is solid waste collection during all months the dwelling unit or portion thereof is provided as short-term rental.
- (iv) Proof of paid taxes and fees associated with the property.
- (v) Valid liability insurance of one million dollars or more that covers the use of the short-term rental unit as required by RCW 64.37.050.
- (vi) A sign shall be posted conspicuously inside the short-term rental with the following information:

- Lewis County short-term rental permit number.
- The statement "Occupants shall follow all local burn restrictions."
- A floor plan indicating location of fire extinguishers and all exits.
- Instructions regarding waste collection.
- Posted quiet times starting no later than 10:00PM and ending no earlier than 7:00AM.
- Local contact information for the owner or property manager who can physically respond within three hours if necessary.

From: [Connie Parsons](#)
To: [Kevin Freitas](#)
Cc: [Mindy Brooks](#)
Subject: Re: Testimony/comments re: short term rental regulations
Date: Monday, July 7, 2025 9:43:42 AM

You don't often get email from connie.parsons@gmail.com. [Learn why this is important](#)

Hi Mindy,

Thanks for organizing this. Just a couple of added thoughts:

17.105.040 (6)

- Signage large enough to be readable from the road (aside from a simple house number) is not an option in our community due to HOA rules. Perhaps, instead, a scannable QR code or similar can be substituted or, likewise, a simple database searchable by address could be provided by Lewis County of all registered STR owners for easy lookup and access.

- “Local” should be removed as a requirement as, for owners like us near the boundary between counties, some of the people we hire to support our guests aren’t strictly in Lewis County. Likewise, even though we’re in Seattle, we make ourselves available 24/7 and are able to quickly contact and dispatch any area help if needed. Please focus this requirement on response time vs. location.

This signage request would be onerous and unpleasant in most communities. It will detract from the community feel. Additionally, it marks an empty home for 6-9 months of the year and makes us a target for break ins and vandalism.

People who support us for cleaning and maintenance come from Lewis and Pierce county. We are on the border.

17.105.040 (7)

- Landfill and recycling bin location and storage should not be regulated but, instead, focused on safety and accessibility by owners and renters and how best to handle wildlife concerns. Likewise, space is an issue for us when deciding where massive, 90-gallon bins are stored and prescribing “indoor” unfairly targets those without adequate space to do so.

This rule would need to focus on all residents if the goal is to control pests and wildlife. It's unfair to our residential use to ask us to store our bins differently from our neighbors.

Additionally, the bins of people who live there are more likely to attract animals as they are more regularly filled with food waste. Our bins are empty half the year.

On Mon, Jul 7, 2025 at 9:13 AM Kevin Freitas <kevinfreitas.net@gmail.com> wrote:

Director Brooks:

Please consider our following testimony/comments for the proposed planning commission rules regarding short term rentals in Lewis County.

My partner Connie and I are fortunate to own a vacation home at 129 Rainier Vista Dr. in Lewis County outside Mineral that we rent out during the summer months when we’re not visiting (which, frankly, is most of the best times for renting). :) We write today to request care when applying new rules to STRs as not all rentals nor owners are the same. Thresholds for nights-rented can make a huge difference for single-STR owners like us who rent to families to keep disturbances in our neighborhood to a minimum and use the money to help offset some of our costs versus investor owners of multiple properties who gobble up real

estate inventory and cause local disruption by renting as many nights as possible at whatever price.

Our vacation home would be off-the-market regardless of renting but our mindful rental activity provides more benefits to the local economies and less negative impact than we would alone. Focusing rules and fees on nights-rented versus blanket ones can place the community costs on those who slam neighborhoods with an endless stream of guests vs. responsible owners like us.

With that context in-mind, please consider our feedback items below.

17.105.040 (6)

- Signage large enough to be readable from the road (aside from a simple house number) is not an option in our community due to HOA rules. Perhaps, instead, a scannable QR code or similar can be substituted or, likewise, a simple database searchable by address could be provided by Lewis County of all registered STR owners for easy lookup and access.
- “Local” should be removed as a requirement as, for owners like us near the boundary between counties, some of the people we hire to support our guests aren’t strictly in Lewis County. Likewise, even though we’re in Seattle, we make ourselves available 24/7 and are able to quickly contact and dispatch any area help if needed. Please focus this requirement on response time vs. location.

17.105.040 (7)

- Landfill and recycling bin location and storage should not be regulated but, instead, focused on safety and accessibility by owners and renters and how best to handle wildlife concerns. Likewise, space is an issue for us when deciding where massive, 90-gallon bins are stored and prescribing “indoor” unfairly targets those without adequate space to do so.

17.105.050 (1)

- Annual fees should be based on nights-rented/used and any fees should be offset by reduced lodging taxes and/or property assessment and related taxes. Our residential use (as defined by the WA State Supreme Court) does not make us hotels nor should we be taxed as such.

Overall

- Please make clear that renewing a permit annually doesn’t mean an owner has to re-enter any pool of available rental slots. As long as we’re in good standing, continuity of rental income is key for planning, tax, and personal anxiety purposes.

Thanks so much for carefully considering and applying our feedback. We look forward to continue enjoying our property ourselves and helping the local economies by sharing it with occasional visitors as well.

Kevin Freitas and Connie Parsons
253-229-5093

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From: [Tom Powell](#)
To: [Mindy Brooks](#)
Subject: Testimony
Date: Monday, July 7, 2025 1:51:26 PM

You don't often get email from tomapowell@hotmail.com. [Learn why this is important](#)

Tom Powell
123 Main St E
Packwood, WA 98361
tomapowell@hotmail.com
253.376.5092

July 7, 2025

To: Lewis County Commissioners &
Planning Department

Attn: Mindy Brooks

RE: Proposed Restrictions on Short-Term
Rentals (STRs) in Lewis County/Packwood
WA

Dear Commissioners,

I am writing as a part time resident and
property owner in Packwood to respectfully

urge you to reconsider any proposed restrictions or caps on short-term rentals (STRs) in our community.

As you know, Packwood is not just a quiet town—it is a unique, tourism-dependent economy built around our access to nature, recreation, and seasonal events. From White Pass to Mount Rainier National Park, our town attracts thousands of visitors who bring much-needed revenue to local businesses. Without a robust supply of STRs, Packwood simply cannot accommodate that demand—our traditional lodging options are too limited.

Many of us who live here year-round or part-time depend on STR income to afford mortgages, cover rising property taxes, and remain financially stable in an area with few other economic opportunities. In fact, STRs are one of the few ways longtime residents can stay in town and remain part of this community despite rising costs. For retirees, working families, and others, that supplemental income is not a luxury—it's a lifeline.

STRs also provide local jobs: cleaners, handymen, snow removal crews, and property managers all rely on this industry. They help sustain restaurants, cafes, hardware stores, and outdoor gear shops. Local tax revenues from lodging and sales tax support our roads, emergency services,

and community projects. Capping or restricting STRs would reduce this economic activity at a time when we need it most.

It's also important to recognize that capping STRs will not magically create affordable long-term housing. Many of these properties are in scenic, seasonal, or high-end areas that are not suited for workforce housing even if converted. **If STR use is restricted, owners may simply leave homes vacant or reserve them as private second homes—removing both economic value and potential housing stock.**

Moreover, restrictions threaten to hurt the very people they intend to help. By lowering property values and eliminating rental income, STR caps would make it harder for long-term residents to stay, invest in their homes, or pass down property to future generations.

Instead of hard caps or blanket restrictions, I urge the County to consider thoughtful, balanced solutions—such as fair permitting systems, incentives for long-term rentals, or programs that channel STR tax revenue directly into workforce housing efforts. I would also suggest looking to neighboring towns such as Randle and Naches as locations for more long term rental opportunities vs restricting the current STR momentum that has helped drive the economy in Packwood (a town built on

tourism after the mill was closed).

We can and should find a way to preserve the character and livability of Packwood without dismantling the tourism engine and economic diversity that make it vibrant in the first place.

Case Studies - Lessons from Other Towns:

- **Bend, Oregon** implemented tight restrictions on STRs in residential zones, including a 250-foot buffer between rentals and a strict licensing cap. The result?

A significant drop in new STR activity,

Increased legal and enforcement costs,

And no substantial improvement in long-term rental supply, since many homes remained second homes or sat vacant.

Worse, Bend saw declines in tourism-related tax revenue that had helped fund local infrastructure and public services.

- **South Lake Tahoe, CA** banned most vacation rentals in residential areas in 2018. This led to:

A 30% drop in lodging tax revenue,

The loss of hundreds of local jobs,

And little impact on affordable housing, as STR homes were often bought by out-of-town buyers who kept them as private vacation homes.

- **Durango, Colorado** capped STRs in many

neighborhoods, only to find that:

Property values in capped zones declined,
Local businesses reported less foot traffic,
And the town had to deal with ongoing
conflicts and confusion about enforcement—
without achieving meaningful housing
reform.

- **Palm Springs, California**, despite being a
long-standing tourist destination, saw a wave
of lawsuits, declining tax income, and a more
divided community after strict STR limits
were introduced.

These towns show that restricting STRs does
not automatically create affordable housing.
In fact, it often reduces available lodging,
drives down property values, weakens the
local economy, and displaces local residents
who rely on STR income to remain in their
homes.

Thank you for your time, service, and
consideration of this vital issue.

Respectfully,

Tom Powell

Packwood Part time Resident & Property
Owner

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From: [Janel Stoneback](#)
To: [Mindy Brooks](#)
Cc: [Janel Stoneback](#)
Subject: RE: Testimony on STRs Monday,
Date: July 7, 2025 12:08:10 PM

Hey Mindy,

As President of High Valley Country Club, small business owner (king County) and a Broker for Windermere Real Estate it is my personal opinion and observation that putting any sort of restrictions on STR's will be detrimental to the current housing values and overall sustainability of the communities survival. I understand that it is hard on affordable housing, but restricting STR's will further deter long term sustainability of Packwood's commerce & economy. Tourism drives both. The affordable housing of the 90's cannot sustain the current affordability to do business in Packwood. Restricting STR's will further eliminate employment & business opportunities. STR's are already taking a hit from the current state of affairs in our country as a whole, especially in rural communities. Services are non-existent or unaffordable due to the ability to survive year round in a seasonal community. Restricting STR's further puts strain on business owners trying to survive year round in a seasonal community. With a majority of the homes in HVCC- 2nd homes, not necessarily STR's we struggle to find volunteers that have historically kept the organization afloat. We struggle to employ folks seasonally since to live in Packwood you need year round employment, which we compete with the other businesses in the same situation for. STR's & 2nd homes bring in the business to support the seasonal & full time economy, which supports the community survival overall.

Janel Stoneback
206-478-7773 or 206-244-5900
Windermere Real Estate South Inc
Janel@Windermere.com



TransAlta Centralia
Generation LLC
913 Big Hanaford Road
Centralia, Washington
USA 98531

T: +1 (360) 736-9901
www.transalta.com

Cody Duncan
Manager: Admin, Growth & Development
Direct Line: (360) 807-8049
Email: cody_duncan@transalta.com

July 7, 2025

Mindy Brooks
Director, Community Development - Lewis County

Lewis County Comprehensive Plan Update- Comments

Dear Mrs. Brooks,

In response to the Lewis County Comprehensive Plan Periodic Update Materials, TransAlta would like to submit the following comments/proposed changes for review by the Commission. Please don't hesitate to reach out if there are any questions or concerns.

17.127.100 Solar Power Production Facilities

- (2) Solar Energy Facilities shall not be allowed on sites or portions of sites with an existing average slope greater than seven percent (7%). Each solar energy facility submitted for permit consideration shall include a full topographic survey of the site with 2-foot contour intervals. The topographic survey shall delineate all portions of the site greater than 7-percent slope.

TransAlta's Response: *We request that the code above be changed to "Solar Energy Production Facilities shall comply with manufacture specifications concerning allowable slope tolerance or shall grade the site into compliance"*

TransAlta's Reasoning: *The 7% slope threshold proposed in the new code is well within the tolerances of industry standard racking equipment. The industry has regularly been constructing on slopes up to 15% using tracking systems and 30% slope using fixed tilt systems. Some of the best solar resource is located on south facing hills (which yields more hours in direct sunlight) and we would not want to preclude these sites from development in Lewis County. New advances in Solar racking are always being made allowing solar on steeper hillsides. The suggested code will allow Lewis County to keep up to date advanced in racking technology*

17.127.100 Solar Power Production Facilities

All equipment associated with the facility shall not exceed a maximum of 20 feet in height as measured from grade at the base of the equipment to its highest point during operation, as shown in Figure 1.

TransAlta's Response: We request the code above be changed to *"All equipment shown in Figure 1 shall not exceed a maximum of 20 feet in height as measured from grade at the base of the equipment to its highest point during operation."*

TransAlta's Reasoning: We believe that the intent here is to limit the panel structures (shown in Figure 1) to 20ft and want to avoid any confusion about this language of "all equipment associated with the facility" extending to the substation and transmission lines associated with the project. For safety reasons (Lightning protection and Electrical Code) the transmission poles and substation shield wires need to be taller than 20ft.

17.127.040 General Standards

- (1) Screen and buffering. Screening around the perimeter of the site must be provided. Screening may include fences, walls, vegetation, earth berms with vegetation, or a combination of these or other methods. The screening must be at least eight (8) feet high. Fences and walls shall be articulated by at least two (2) feet in depth, or a shrub or tree shall be planted every 25 feet, of fence or wall length. When vegetation is used, it must obscure at least 80 percent visibility of all equipment and structures as seen from rights-of-way and adjacent properties. The use of vegetation as screening and buffering is prohibited within 20 feet of any facilities or equipment associated with Battery Energy Storage Systems.

TransAlta's Response: We ask that MID or RAI zoning be exempt from vegetation screening requirements (fence only) as they are zoned for industrial areas where vegetation screening may not be needed.

Thank you,

TRANSALTA Centralia Generation LLC



CODY DUNCAN
Manager: Admin, Growth & Development

From: [Nichole Wolfe](#)
To: [Sean Swope](#); [Lindsey Pollock](#); [Scott Brummer](#); [Mindy Brooks](#)
Cc: [BOCC](#)
Subject: STR proposal in Packwood
Date: Monday, July 7, 2025 8:37:59 AM

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Dear Lewis County Commissioners:

I am writing as a concerned property owner in Packwood. In 2020, we bought a vacation home in the Elkhorn neighborhood with the intent of vacationing there during the ski season and then renting it on Airbnb to help offset the costs. We bought it just before Covid shut down the world and we had no idea how it was all going to work out.

Since then, we have created a 5 star review property that brings people and money to the local economy. We have had no guests cause any problems to the neighborhood. We have a UBI number, we pay lodging tax to the state and Lewis County. We are taxed by Lewis County on our personal property that is in the house. Our Lewis County property tax assessment has more than doubled.

We hire housekeepers, landscapers, window washers, gutter cleaners, HVAC repair, hot tub repairmen, and handyman services. In short, we contribute a lot to the local economy! Our guests also contribute to the local economy with their tourism dollars.

The problem is affordable long term housing for the locals. STRs do not contribute to this problem. The entire country has seen housing prices increase exponentially and make it impossible for first time buyers to enter the market. This has nothing to do with STRs and limiting their existence will not solve the problem. I can guarantee that the vacation home we purchased would not have been purchased by a local. There might be one house in our neighborhood that is occupied on a more regular basis, but otherwise, all the houses are definitely vacation homes.

There are many problems with the proposed STR proposal. My biggest concern, is that you are dictating what we can and cannot do with our property. What happened to freedom? As I sit here, I'm in my American Flag shirt from the Independence Day celebrations. It's ironic that we work so hard for the american dream and then have bureaucracies try to take it away.

I'm fine with permitting our home. But I believe it should be transferable to family and with a sale (to retain property values).

The other rules for trash, signage, etc put an unnecessary burden on the homeowner/property manager and infringe upon privacy rights. I support smart regulations that make sense, but the blanket 25% cap does not make sense.

I feel for our good friends who have property in our neighborhood and are in the early construction phase. They based their budget on the ability to bring in some rental income if needed. They will not be fully constructed in time, if you pass these regulations with a 12/31/2025 deadline for permitting.

Here are some questions that I would love answered:

1. Where is the data that shows STRs have caused harm to the citizens of Packwood?

2. If we stop renting our home, will our assessment go down? Will we have lower taxes?
3. What if we let our STR permit accidentally lapse? Is there a grace period?
4. Why the push to get this process done by the end of 2025?
5. Where is the data that limiting STRs will have a positive effect on the housing market and suddenly provide affordable housing to the locals?

I look forward to hearing the results of the Tuesday evening meeting. Unfortunately, we are unable to attend in person.

Your consideration is greatly appreciated.

Regards,
Nichole & Brooks Wolfe
114 Bugle Lane, Packwood
360-271-5225

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Planning Committee

RE: Packwood Growth

My comments will be behind all that has been decided on so far, but feel impressed to give comment

My request has always been to save the neighborhood, the residential areas. When covid hit my question was why no control on all property being bought and flipped for short term with out any thought to community. My home of almost 50 years on Tatoosh 3/5 went from 10 to 15 with the last 5 being short term. ALL open lots are now housed with short term houses. There appears to be only growth to our town, not any thought to the town as it was which is what brought all the interest. It is no longer rural. It is being changed by those construction companies and out of state individuals with the financial bank accounts to ignore the town and build for profit.

I questioned how we will support the community, one store, restaurants, but no housing for employees.

Change is inevitable but it was a free for all and now we want guidelines.

We talk about sewer, but respectfully, it is a joke, close to 20 years in the making and monies have provided for Analysis , which seems wasted as nothing became of all the work put in. We hear rumors we will get the money. It again appears money time and money was wasted I am saddened that the commissioners did not protect rural Packwood. The regulations now perhaps will narrow some growth but Packwood is gone something new is being created and for those of us that have over 25 years here it feels as if we have been ran over and the almighty dollar in the hands of fewer is creating a new town.

I appreciate all Mindy has organized and stayed with.

Barbara Wright
118 Tatoosh Trail
360-496-1017

From: [Alison Brock](#)
To: mindy.brooks@lewiscounty.gov; [Mindy Brooks](#)
Subject: Re: Letter about STR
Date: Tuesday, July 8, 2025 12:04:41 AM

You don't often get email from alisonbrock253@gmail.com. [Learn why this is important](#)

Alison Weiss

On Mon, Jul 7, 2025 at 7:08 PM Alison Brock <alisonbrock253@gmail.com> wrote:

Dear Lewis County Planners & Commissioners,

I am writing as a homeowner in Packwood and a proud member of an active-duty military family to respectfully express my concern about the proposed restrictions on short-term rentals (STRs). These changes—particularly the burdensome permit process, limitations on property rights, and potential impact on tourism—pose real risks to our community's vitality and to families like mine.

Our home in Packwood has been a blessing. When my husband received a change of duty station, our ability to rent out our property as a short-term rental provided essential financial stability during a time of transition. Military families like ours often face unpredictable moves, and short-term rentals offer a rare chance to stay afloat without selling our homes or uprooting our investments. Packwood offered us not just a place of rest—but a lifeline.

The proposed Type I permits, non-transferability, and mandatory 3-year renewals will introduce unnecessary red tape. These requirements risk pushing out responsible local hosts who are already doing everything right. It's a system that favors outside investors over families rooted in the community.

Additionally, restricting homeowners from renting both a primary residence and an ADU—even on lots that meet zoning and septic compliance—needlessly limits our property rights. Flexibility is critical for families managing changes in life and work. These limitations are a step backward for personal freedom and smart land use.

Most concerning of all is the potential economic harm. STRs are the backbone of Packwood's growing tourism economy. According to recent county tax data, lodging tax revenues have seen steady year-over-year increases, directly benefiting local infrastructure

and services. Fewer STRs mean fewer visitors, and that means less spending at local shops, restaurants, coffee houses, gas stations, and seasonal events. Our town depends on that revenue. Tourism supports jobs, encourages small business development, and keeps Packwood vibrant year-round.

I ask you to please reconsider these proposed restrictions. Grandfather existing/operating STR's and focus on common-sense regulations that preserve neighborhood character without dismantling the very system that supports our local economy and provides relief for working families—especially military families like mine.

Thank you for your service to our county and for listening to the voices of residents who love and care deeply for Packwood's future.

Sincerely,

Alison Weiss
253-732-3834

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From: [Tony Burmeister](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Short term rental caps
Date: Tuesday, July 8, 2025 7:00:58 AM

Some people who received this message don't often get email from exterminatorTony@gmail.com. [Learn why this is important](#)

To whom this may concern,

I found out today there is a meeting tonight regarding short term rental caps which includes Ashford and since I cannot be there I wanted to tell you how this affects my business.

We are one of the very few businesses that operate a pest control business in the Ashford area and reducing the cap on short term rentals will definitely hurt my business and with that impact businesses we use regularly out there.

We rely on the income from each service we provide with the rentals which is over 40 of them. This results in about 24,000 is lost revenue in a single year potentially.

Ashford is a mainstay for many people including my family and many friends throughout the year due to its proximity to the mountain and many trails. I ask you to reconsider Ashford in your endeavors to reduce Lewis county short term rentals.

Thank you

Tony the exTerminator

Tony Burmeister Or Julia McCain-Burmeister

Owners / Technicians

Email address exterminatorTony@gmail.com

www.tonyexterminator.com

253-242-0097

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From: [Tracy Croshaw](#)
To: [Mindy Brooks](#)
Subject: STR comments
Date: Tuesday, July 8, 2025 5:32:12 PM

I can't make the meeting this evening. I thought I was going to be able to. Please know that I've talked with a LOT of people who are good with some of the recommendations but think the 25% cap has not yet had sufficient review and implementation is not understood. It's premature here, as is the UGA in general, I think. Having zoning regs we can't implement will be confusing at best. Some think the proposed STR rules are just for the UGA, some for a bigger area including some of the HOA's, some think it's just everywhere, but how would the 25% be calculated? Where are the boundary lines within which you take a count? Why can't full time residents be given preference for adding adu's, either as STRs or as long term rentals? I didn't understand the state decision dismissal and can't find anything online.

Also know that, when I first heard about the idea of excluding new builds from the 25% cap, it made sense to make the older stock available for long term. I voiced thinking that might be good at the CAC meeting the other evening. I was wrong. The more I've thought about ramifications, that just gives preference and encourages building to new developers who will eat up available STR licenses and disadvantage locals who live here. If there is to be a cap, it should be across the board and not exclude new building in those rules.

Thanks for reading and considering.

Tracy

Tracy Croshaw
Packwood core resident and business owner.
(509) 929-2468

Sent from my iPhone

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Lewis County Community Development
c/o Mindy Brooks
125 NW Chehalis Ave
Chehalis, WA, 98532

Via Email to mindy.brooks@lewiscountywa.gov

Dear Lewis County Community Development:

Thank you for the opportunity to comment on the Lewis County Comprehensive Plan, Zoning Code, and Development Code Regulations.

Lakeside Industries, Inc. (Lakeside) is a family-owned business operating in Lewis County. Our operations provide essential services to the community, by paving roads throughout the County, selling asphalt and aggregate material to support infrastructure improvements in the community, and providing well-paid, union jobs. With this letter, Lakeside requests that the County reconsider the language of its proposed code to avoid ambiguity and maintain the County's current policy of when asphalt plants are allowed in the MRL zone.

To begin, the new code defines "Mining" to include asphalt batching as an accessory use:

"'Mining' means quarrying or extraction of material...together with the necessary buildings...on said property where at least one of the major mineral or material constituents being exploited is from said property, including, but not limited to...asphalt mixing..." See [Periodic Update Materials, Task 10 – Zoning and Development, Chapter 17.10 Definitions](#), LCC 17.10.130 "M" Definitions, Page 2 of 6.

"Mining" is not listed in the [Land Use Summary Table 2](#) (17.42.020), but "Mineral Extraction" is included. We first recommend that this inconsistency be resolved.

In the Land Use Summary Table, "Mineral Extraction" is a permitted use in the MRL zone and "Mineral processing, batching" is a permitted accessory use in the MRL Zone. The Code does not define "mineral processing, batching". In the mining industry, this would be defined to include aggregate crushing and asphalt/concrete batch plants. However, in a separate portion of the same table, "asphalt, concrete, mineral products" is not an allowed use in the MRL zone. For this reason, this table is contradictory and will result in confusion about what activities are allowed in the MRL zone.

In contrast, the current Lewis County Code clearly and specifically states that asphalt plants are permitted when accessory to mining in the MRL zone. (See LCC 17.30.750). Lakeside asks that the County continue its existing policy in its new code.

Thank you for your time and understanding.

Sincerely,



Kyler Danielson
Land Use Project Manager
Lakeside Industries, Inc.

Testimony of Karli Devoe, Packwood resident, for Lewis County Planning
Commission meeting on July 8th, 2025

Karli Devoe
120 Edmonds Rd
Packwood, WA 98361
360-888-2818
karlidevoe@gmail.com

My name is Karli Devoe and my husband is Perry Piercy. We are full-time residents of Packwood and have been for 5.5 years, when we purchased a home on Edmonds Rd in downtown Packwood that my parents had owned since 2005. Perry is a stay-at-home dad and a substitute teacher with White Pass, and I was, until a month ago, the main Occupational Therapist at the hospital in Morton, when I stepped down to casual part-time in order to spend more time with our two small kids, ages 4 and 1, and help with our STRs. We make our living currently through Airbnb. The full implementation of these regulations, as written, would mean our family, who lives full-time in Packwood, would not be able to survive financially. If the goal is to make Packwood a better place for families to live, these regulations would have the exact opposite effect on my family, and we would have to seriously consider whether we could continue to live here, in a place we both love and are heavily involved in. We live in the house on Edmonds and rent out alternative dwellings, which are being targeted by these proposals. Tourists love these accommodations, and we are not taking housing away from anyone.

I propose the following:

- Remove language targeting the use of RVs, tents, treehouses, tiny cabins as STRs. These are very popular with tourists and bring money to local families and the town without affecting long-term housing.

- To regulate RVs, consider regulating those who boondock and live long-term in RVs, such as over 30 days. Fires, sewage, and sanitation problems are not coming from STR use of RVs, or alternative dwellings, as the owners of these STRs have an extremely strong interest in keeping these accommodations in top

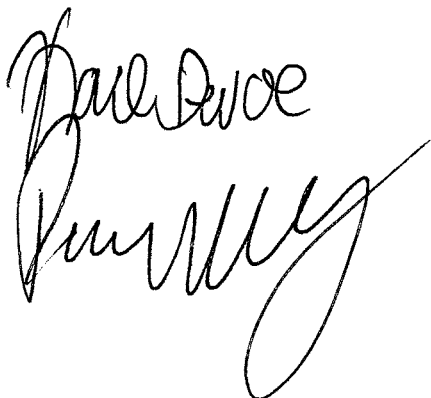
shape and presentation in order to avoid bad reviews and subsequent loss of income. No one is going to rent an RV on Airbnb that has sewage leaking onto the ground. Target existing large RV park owners who allow unsanitary and unsafe conditions. There is an existing very large RV park near Packwood that has a huge drug and sanitation problem, and these are not STRs or AirBnB tourists.

-Consider adding language which allows modified requirements when issuing RV park permits, such as smaller size, in order to accommodate STRs in the form of RVs in the downtown core, again without taking up housing inventory.

-Do not allow future development without requiring developers to contribute affordable housing inventory. Take the burden off local families and owners and small-scale property investors and vacation home owners, and place it on multi-millionaire developers who stand to make huge money off Packwood's popularity.

-Please consider that tourists bring a huge amount of money to Packwood, a town that has struggled economically since the loss of the mill. RVs and alternative dwellings allow for accommodating the influx of tourists without straining permanent housing inventory.

In summary, I strongly believe that implementing these regulations as written misses the mark on making Packwood more livable for full-time residents. We are full-time residents, and these regulations would cause us to have to strongly consider leaving Packwood, a place we love and consider home. It's the only place we have lived together since getting married, and the place we brought our two babies home to.

A handwritten signature in black ink, appearing to read "Paul Dwoe". The signature is stylized with a large, looping "P" and a long, sweeping underline that extends to the right.

From: [Cody Griffith](#)
To: [Mindy Brooks](#)
Subject: Opposition to Proposed Short-Term Rental Regulations
Date: Monday, July 7, 2025 6:55:26 PM

You don't often get email from hardlyworking.nw@gmail.com. [Learn why this is important](#)

Cody Griffith
109 Sitzmark Ct Packwood Wa 98361
Hardlyworking.nw@gmail.com
360-464-3382

Dear Honorable Council Members,

I am writing to express my strong opposition to the proposed ordinance that would impose new regulations on short-term rentals (STRs) in Packwood. While I understand the intent to address community concerns, this ordinance would have severe unintended consequences—harming local families, stifling tourism, and jeopardizing the financial stability of residents like myself who rely on STR income.

****Why This Ordinance Hurts Our Community****

1. ****Threatens Local Jobs & Small Businesses**** – We hire members of our community to clean, maintain, and manage our property. These jobs help neighbors provide for their families, and stricter regulations could eliminate this vital income for them.
2. ****Makes Housing Less Affordable for Residents**** – Like many in Packwood, my family depends on STR revenue to afford living here. Without it, we could face financial hardship or even be forced to leave. STRs allow us to offset rising mortgage costs, property taxes, and upkeep expenses.
3. ****Damages Tourism & Local Economy**** – Visitors who stay in STRs support our restaurants, shops, and attractions. Overregulation will push tourists to neighboring cities, hurting small businesses that rely on their patronage.
4. ****Existing Laws Can Address Concerns**** – Current nuisance, noise, and safety ordinances already hold bad actors accountable. Punishing all STRs for a few problem properties is unfair and unnecessary.

**A Better Solution**

Instead of restrictive bans or excessive fees, I urge the Council to:

- ****Focus enforcement on problematic rentals**** (without penalizing responsible hosts).
- ****Create a simple, affordable registration system****—not caps or heavy fines.
- ****Work with STR owners**** to develop reasonable rules that protect neighborhoods while preserving economic benefits.

Short-term rentals are a lifeline for many in our community—including the local workers we employ and families like mine who rely on this income to stay in our homes. Please reject this ordinance and seek balanced solutions that support residents, small businesses, and responsible tourism.

I would welcome the opportunity to discuss this further and appreciate your time and service

to our city.

Sincerely,
Cody Griffith

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From: [Chi and Karen](#)
To: [Mindy Brooks](#)
Subject: Written Testimony: LEWIS COUNTY CODE 17.105 SHORT TERM RENTALS
Date: Monday, July 7, 2025 3:39:55 PM

You don't often get email from chiandkaren@gmail.com. [Learn why this is important](#)

July 7, 2025

Dear Lewis County Commissioners,

I, Karen Ha, am writing **in opposition to the proposed LEWIS COUNTY CODE 17.105 SHORT TERM RENTALS** as the standards and requirements are highly restrictive. While I support permits and regulations for public safety and guest comfort (which is essential for short-term rentals regardless), I have concerns about the strict regulations in this code.

I urge the commissioners to reconsider and make amendments for the following reasons:

A) **17.105.010 Purpose** — Is there data to support these specific caps and standards will improve affordable housing and not increase economic losses? Most vacation home owners will likely not rent out their property which doesn't improve housing inventory. If many will sell, this may reduce property value and as a result decrease in property taxes (Reference: [Economic Losses Due to STR Restrictions](#)).

B) **17.105.050 Permit issuance** — I have rented out our cabin since 2021 and it seems like an enforced cap by lottery can just wipe out that needed income and years of hard work away. Existing legal short-term rentals with state business licenses that report and pay state taxes should be grandfathered into these new caps. I would also like to understand and see data of where the 25% cap number came from? Is it just arbitrary or is there data to prove that this cap can actually support 17.105.010 Purpose "...not having a significant impact on residential housing supply ..."

C) **17.105.040 Standards** — Few of these standards are onerous and provide more inconvenience than benefits. For example:

- (5) Why does the "property address" need to be posted from the road? We never had guests get lost and we provide clear directions in our guest communication. There are also public street signs and we display our house number.
- (6) We have a great relationship with neighbors and never had a complaint. Our neighbors also have our personal phone number. Having a large sign visible from the road with a 24/7 local number seems to be invasive of personal privacy. Are there other counties with STR regulations requiring this?
- (7) Garbage needs to be enclosed and indoors, which is what we advise guests to do now and our cleaner removes all the trash upon checkout. We pay for their private garbage service to ensure a clean stay and not dealing with public collection bins. The code requires we have garbage service (17.105.050 2d) which means these rolling bins are stored outdoors. This causes more issues because we need someone to roll bins in and out before garbage collection. It sounds like we also need to build an indoor solution for these collection bins based on the contradicting rules. This creates more problems than it solves.

D) **17.105.050 (3) Permit does not ride with the property** — If the permit and ability to rent the property as a short-term rental does not transfer upon sale, then why are short-term rentals assessed based on STR use / previous sales? The permit should ride with the property if it is assessed as a STR or vice versa.

Thank you for considering my reasons for opposing the proposal.

Sincerely,

Karen Ha
107 Elkhorn Trail
Packwood WA 98361

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July 7, 2025

Lewis County Board of Commissioners
351 NW North St
Chehalis, WA 98532

Subject: Opposition to Proposed Lewis County Code 17.105 – Short-Term Rentals

Dear Commissioners,

I am writing to express my strong opposition to the proposed Lewis County Code 17.105 regulating short-term rentals (STRs). While I understand the desire to manage growth and preserve community character, this proposed ordinance risks unintended consequences that will harm the very residents and economy it seeks to protect—especially in communities like Packwood, which now depend heavily on tourism.

1. Density Caps & Equity

If density caps are implemented, current STR operators should receive a **legacy exemption**. Caps applied without nuance disproportionately penalize small-scale owners—part-time residents, retirees, and locals who rely on modest STR income to maintain their homes. Meanwhile, large investors may absorb these regulations with minimal impact. This blanket approach risks pushing out exactly the people with the deepest roots in the community.

2. Lost Opportunity for Housing Investment

Lewis County has the authority to **allocate lodging tax revenue from STRs** to address affordable housing or infrastructure. Many mountain communities—including Telluride, Steamboat Springs, and Crested Butte—dedicate STR taxes to housing or homelessness initiatives. Without a similar investment strategy here, these restrictions generate no meaningful public benefit while burdening local homeowners.

3. Operational Requirements Need Flexibility

- **Garbage removal:** Requiring proof of garbage service is reasonable, however, owners should be allowed to demonstrate compliance through multiple means.
- **Exterior signage:** Mandating visible signage with owner contact info raises safety and privacy concerns. If the county maintains permit records with contact information, neighbors and enforcement already have access. A posted sign is not necessary, and this requirement doesn't align with how any other type of homeowner is treated.

4. Packwood's Tourism-Based Economy

Packwood has evolved into a tourism-dependent town. Regulations like those proposed in 17.105 will have a profound impact on families and individuals who both use and share their homes to afford them. Take High Valley, for example—designed as a vacation community. Many of its STR owners are not corporate investors, but regular families who vacation part-time and rent part-time to keep their homes. If they are forced out, these homes will likely be sold to wealthier buyers who can afford to let them sit vacant, further reducing housing availability and removing STR income from the local economy.

5. Lack of Nuance in the Code

The current proposal feels overly broad and **lacks the balance** found in similar communities. Where other mountain towns offer thoughtful solutions—like zone-specific rules, legacy exemptions, or tying tax revenue directly to housing—Lewis County's draft seems more punitive than productive. It fails to distinguish between small local owners and large-scale investors and offers no path to reinvest the income it generates into the community.

In summary, Code 17.105, as currently written, is inequitable. It disproportionately harms small-scale and part-time owners while failing to address the real drivers of the local housing shortage. A more balanced, community-informed approach is needed—one that protects locals, preserves economic vitality, and invests STR revenue into long-term housing solutions.

Sincerely,
Andrea Erickson

July 7, 2025

Dear Planning Commission,

I am writing to ask the commissioners to please reject the proposed STR cap limits, which will harm local families and do little to create affordable housing. Instead, I ask that you adopt Joe's Loeffler's recommendations and focus on limiting ownership to no more than 10 STR's per business entity.

- 1. Restricting Short Term Rentals will not increase affordable housing.** Cabin owners in the Elkhorn development that I have spoken with want to use their cabins for 3-6 months out of the year. They do not want to convert their homes to Long Term Rentals. Instead they have expressed that they will be leaving them empty for much of the year if they cannot rent short term. Empty homes will not increase affordable housing.
- 2. Small, seasonal STR operators are not a threat to Packwood's small-town character.** STR's support tourism and local businesses in Packwood and bring a much needed vitality to the town. The increase in tourism has attracted new businesses to the town in addition to restoring old buildings that have made it a much more attractive place to visit. In addition there has been many new employment opportunities that have benefited locals from this growth.
- 3. Cap Limits should focus on limiting the number of STR's one person or entity can operate.** If any limits are placed on STR's in Packwood we should limit the number of STR's one person or entity can operate to 10. Larger entities should be the focus of STR regulations not individual cabin owners that rely on STR income for part of the year.
- 4. Packwood Sewer will increase higher density housing units and help create affordable housing.** Higher density development in Packwood is currently limited to Lewis County septic regulations which determine the number of units per acre you can have (see LCC 8.40.310). The new Packwood sewer system will support higher density apartments, and other multifamily options that will be more affordable.

I am asking the board of County commissioners to please reject the proposed STR cap limits which do little to create affordable housing in Packwood. Instead, adopt Joe Loeffler's policy recommendations that limit the number of STR's one entity can operate and wait for the Packwood Sewer System to relieve affordable housing concerns.

Thank you,

Schuyler Jorgensen
360-951-0054
Owner of Goat Rock Investments LLC

From: [Lisa Kendall](#)
To: [Mindy Brooks](#); [Scott Brummer](#)
Subject: STR regulations
Date: Tuesday, July 8, 2025 8:23:12 AM

You don't often get email from littlelisakendall@yahoo.com. [Learn why this is important](#)

My name is Lisa and I'm a housekeeper out in Ashford, and I've also been working on my own cabin for quite a few years to become a STR as well. There's a lot to complain about with the regulations. Yes a 25% cap would kill the economy in Ashford. Nobody really wants to live out here and the only reason there's been development is because of the STR boom. I've had my cabin for 8 years and I've watched this community get cleaned up and grow. Its essential growth that this town really needed.

The regulation that seemed the most ridiculous was requiring STR owners to build enclosures for trash cans. Its just a specific punishment to the short term rental community. Nobody else has to house their trash cans. Guests need a clear line of sight to trash cans. And in some instances trash cans are kept right where they get picked up to ensure consistent pickup, or kept near the end of a driveway. In a lot of instances a structure would not be able to be built where cans are normally kept. Structures would get built farther back on a property. Not only would this be punishing the housekeepers that have to deal with such nonsense, but unnecessary spending costs out of the homeowners pocket to build these. Building a structure just for trash is just basically making homeowners build vermin shelters where mice and rats can congregate into a sheltered space because something like the trash is attracting them. As a housekeeper or a guest I wouldn't want to deal with the hassle and problems that this would create. It was a specific punishment just to the STR community. Nobody else has to do this.

The other thing that specifically didn't make any sense for Ashford or really at all is that a property manager or person of contact would have to be local and reside in Lewis County. We're on the county line. 3 minutes down the road is Pierce County. But furthermore, any homeowner no matter where they're located should be able to be the person of contact. Many homeowners are self sufficient and running their whole STR operation. Nobody is going to know more about the properties in most cases than the home owners themselves. Homeowners will have multiple local contacts depending on what the problem is. I know I wouldn't want to be asked to be someone else's contact just because I fit the criteria. I don't have the resources that the homeowners have for their own properties. And many homeowners aren't local, but that doesn't mean that they can't be reached, and that doesn't mean that they can't fix problems if contacted about their STR. I couldn't imagine if the only way I could keep my housekeeping job is to become that STR contact with my phone number out there. So again, this is something that causes problems for no reason.

Also the part in 17.105.040 (8) sub-section B about having to post an address for owner / property manager. I believe in a little data privacy and theres no good reason to be posting address of residents. Although reaching us through whatever booking platform they used would be ideal, a phone number should be sufficient enough. You wouldn't want a person who became disgruntled or even worse to have your home address. People showing up unannounced or causing problems at a person's place of living isn't a good thing and I'd personally hold the county responsible for this and any incidents that happen. Furthermore, some of us are still dwelling in our STR except when its booked out and the property address would be the same as the property in which they're staying.

The whole thing is very infuriating because Lewis County is already taxing us for best use of our properties even if we don't have a STR. My property taxes have quadrupled in the last 8 years. And Lewis County doesn't contribute any resources to Ashford for the money that they're getting from us. But they want us to pay taxes on something that won't have any resell value if owners try to sell and the STR permit cannot ride with the next buyer. Housing prices will go down, so property taxes should go down, right? That's never the case.

No, I didn't get a testimony into you the day before. But, I really don't really think that it should matter. Its a public hearing, everyone should be heard. But I also know, that hardly nothing can be said in 3 minutes.

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Lewis County Planning Commission
c/o Mindy Brooks
351 NW North Street
Chehalis, WA 98532

To the members of the Planning Commission and County Commissioners,

We are writing to you in general support of proposed regulations to STR operations in Lewis County. As a non-profit dedicated to supporting people to live, work, and thrive in the Packwood community, we understand that STRs are a vital part of our tourism economy. They play an important role in supporting local businesses and expanding lodging options that traditional accommodations often can't meet.

At the same time, the lack of consistent standards has led to real challenges. While many STRs are responsibly managed by resident owners and contribute positively to the community, others—when poorly maintained, frequently vacant, or operated with little oversight—can disrupt neighborhood stability, contribute to nuisance complaints, and place added strain on infrastructure. Although the long-term impacts on housing availability is unknown, there are undeniable concerns around the current loss of housing options for seasonal workers and the working poor in our community as existing housing stock is converted to transient usage.

The first aspect of the proposed regulations requiring business permits, adequate waste services, occupancy limits, and other health and safety regulations should be uncontroversial. When properties are operated as hotelier businesses, they should offer the same guarantees of occupant and community safety as other hotels in Lewis County. Holding properties to occupancy standards will disincentivize party STRs where dozens of occupants overload inadequate septic systems and impede emergency response in the neighborhood. Those same regulations will help drive business towards well-run STR operations with minimal cost to properties already operated as responsibly run businesses adhering to health and safety standards.

The second aspect of regulation would limit STR density in rural LAMIRDs and UGAs to a maximum of 25% of neighborhood housing units. While the ideal percentage is debatable and may vary with community dynamics, establishing density limits can effectively guide new construction to tackle ongoing housing challenges. During periods of high vacancy, neighborhoods overwhelmed by STRs often lack sufficient permanent residents to respond promptly to emergencies like structure fires or burglaries. This situation externalizes costs on emergency services, placing an undue strain on local fire departments and law enforcement, while also increasing risks for adjacent property owners. A density cap not only supports the stability of neighborhoods but also ensures a balanced coexistence of STRs with permanent residents, fostering community cohesion.

As for the unresolved rules-making concerning vesting, permitting costs, and taxation, we believe those should be targeted towards protecting the community investment made by resident STR owners who actively manage their properties, some of whom have purchased large properties with the intent of developing an independent neighborhood of STRs on otherwise undeveloped land. With that caveat, setting the limit just above the highest current density allows us to respect current STR owners who developed properties for that use in good faith, provides guidance and shapes expectations for those looking to enter the STR space in our communities, and helps communities plan services for STR capacity within well-defined bounds, truly a win-win-win.

In looking over the proposed regulations, these seem to offer a framework for Lewis County to build a stock of healthy and profitable STR operations that serve to enhance our communities, while curtailing many of the pervasive negative impacts our currently unregulated market sometimes brings. As such, we the undersigned stand in support of the proposed Short Term Rental Regulations from the Planning Commission.

With the greatest of thanks,

Van Anderson
for Livable Packwood

Kim Pawlawski

Hanna Jeter

Allan Stephenson

July 7, 2025

Planning Commissioners,

I am writing to share my concerns regarding the proposed *Short Term Rental regulations (Chapter 17.105)*.

The new batch of regulations and regional ban on short-term rentals represents significant government overreach, creates unintended problems, suppresses legitimate economic activity and tax revenue, drives up housing costs by adding to scarcity, and unfairly scapegoats STRs for issues that are really caused by irresponsible neighbors, regardless of property use.

I have many objections, but they generally fall into six categories, ranging from technical concerns to broader value-based issues.

TECHNICAL CONCERNS

One: “Residence” standard. The standards requiring RVs, Park Models and mobile structures to be “permitted as a residence” is an inappropriate expectation since it misapplies the manufactured home installation standard. It unreasonably requires:

- Removal of axles of trailers and disable all possibility of moving.
- Blocking to code for mobile homes including towers of blocks on the exterior of both sides of every opening in the walls
- Hurricane tie downs
- A formal stamp from a certified manufactured home installer

Two: Garbage. The standard of requiring proof of a solid waste disposal contract is problematic and potentially impossible. This is not applied to long term rentals or owners, yet the county has a long history of dealing with these kinds of property owners’ trash neglect. If anything, STR owners have such frequent turnover that their motivation to address promptly is very high. Are we sure this is a problem?

- Formal contracts for trash collection are impossible in rural remote areas.
- The county already has code enforcement power for solid waste left outside of buildings.

FAIRNESS AND SCAPEGOATING

County authority should not be used to fine or confiscate property based solely on neighbors’ personal preferences, without a clear and legitimate public interest. If inconsiderate or harmful neighbor behavior is the issue, then the law should apply equally to homeowners, long-term rentals, and short-term rentals alike. If there is real harm, why exempt homeowners and long-term rentals from the same penalties? Singling out STRs for enforcement while sparing others is selective and arbitrary—and invites abuse by those who may wish to drive certain neighbors out of the community.

One: Parking. No jurisdiction in Lewis County requires one parking space per bedroom, and many residents own multiple vehicles. Issues with parking on other people’s property

should be addressed by enforcing existing property rights—not by imposing unnecessary standards and costly, scarcity-producing regulations that unfairly target STRs.

Two: Signs. Lewis county already requires addresses to be posted on buildings, and STR owners have every incentive to ensure guests can find their unit. What problem is this solving?

Forcing an additional self-label on properties that are often vacant increases the risk of break-ins and theft.

Requiring an STR owner to post a phone number also invites harassment and makes it easier for people to target these properties through the complaint system. This mandate unfairly singles out STRs, while other absentee property owners face no similar disclosure burden.

Three: Events. Standards for short-term rentals should be no different than those applied to long-term rentals or homeowners. The county should not assume the liability of selectively shutting down gatherings at just a small fraction of properties while ignoring similar uses elsewhere.

CREATING MORE SCARCITY

These regulations justify their extraordinary reach by claiming they will reduce housing costs. However, adding restrictions, prohibitions, and new compliance burdens only drives up the cost of owning and operating a property. By forcing some properties out of the market and layering on new expenses, these rules actually reduce supply and make housing scarcer and more expensive — the opposite of what they claim to achieve.

A far more effective way to lower housing costs is to reduce unnecessary regulations and expand the land available for housing and short-term rentals. Increasing supply until the market reaches true saturation is what will naturally bring prices back to reasonable levels. Create new zones explicitly for short term rentals and make their development fast and their infrastructure affordable to drive the inappropriate use of residences into more suitable areas.

One: Caps. The enforcement of a sum-zero number of units in some areas is going to be extremely time-consuming, litigious, and likely impossible for the county to enforce. The demand for the reduced number of units will drive prices up, not down.

Two: Local Resident Must Live on Multi Unit Properties. This is a capricious rule not matching any other control over property use. These standards aren't applied to long-term rentals or owner-occupied homes, even though those types of properties more commonly have multiple cars on-site.

Three: Unit types. Reduction of stock by limiting per property units or the types of units when RVs are untenable and tents, yurts, camps, and treehouses are banned will further exacerbate this problem.

I urge you to table this proposal, and focus on (1) addressing infrastructure, (2) saturating the market with STRs and housing supply and (3) enforcing standards on *all* inconsiderate neighbors.

If you remain determined that concerns about housing costs and inconsiderate neighbors require action focused solely on the STR economic enterprise, then I urge you to adopt all eight of my proposed amendments to the draft policy. Doing so would streamline it into defensible public policy rather than unfairly targeting and scapegoating.

Sincerely,

Jami Lund
160 Wakefield Dr
Centralia, WA 98531

(360) 918-3990

Accompanying these remarks for your item-by-item formal consideration:

LCC 17.105 amendment 01 residence standard for RV
LCC 17.105 amendment 02 events
LCC 17.105 amendment 03 solid waste
LCC 17.105 amendment 04 sign requirement
LCC 17.105 amendment 05 capping number of units
LCC 17.105 amendment 06 parking
LCC 17.105 amendment 07 multi unit and resident
LCC 17.105 amendment 08 tents and treehouses

LCC 17.105

https://lewiscountywa.gov/documents/16491/Chapter_17.105_Short_Term_Rentals_xuGmsdZ.pdf

AMENDMENT 008

LOCAL RESIDENT MUST LIVE ON MULTI UNIT PROPERTIES

Rationale:

- This is a solution in search of a problem.
 - People may want to use their property in this way—why ban it?
 - If there are issues with sanitation or other health and safety concerns, existing codes are already in place to address them.
-

17.105.030 Allowance of short-term rentals.

~~(4) Short-term rentals shall not be operated outdoors, such as a tent or treehouse, except as allowed in an RV park or campground.~~

~~(5)~~

AMENDMENT 007

LOCAL RESIDENT MUST LIVE ON MULTI UNIT PROPERTIES

Rationale: this is a capricious rule not matching any other control over property use.

- These standards aren't applied to long-term rentals or owner-occupied homes, even though those types of properties more commonly have multiple cars on-site.
- The right way to address housing supply and price is to expand land use, increase the housing supply, and remove unnecessary cost-drivers — saturating the market instead of forcing artificial vacancies and scarcity.

17.105.030 Allowance of short-term rentals.

~~(2) Where there are up to two (2) dwelling units on a single parcel, no more than one (1) dwelling may be provided as short-term rental. Where there are up to three (3) dwelling units on a single parcel, no more than two (2) dwellings may be provided as short-term rental. For the purposes of this subsection, a detached bedroom shall be considered a dwelling unit.~~

~~(3)~~

AMENDMENT 006

DISCONNECTING PARKING REQUIREMENT FROM THE NUMBER OF BEDROOMS

Rationale: this is a capricious rule not matching any other control over property use.

- These standards aren't applied to long-term rentals or owner-occupied homes, even though those types of properties more commonly have multiple cars on-site.
- The proper remedy for problems like guests parking improperly and infringing on neighbors is to enforce property rights with fines or penalties for those specific violations — not to add new rules that burden all short-term rentals across the board.

17.105.040 Standards

~~(4) A minimum of one on-site parking space per bedroom shall be provided.~~

~~(5)~~

AMENDMENT 005**CAPPING THE NUMBER OF OWNERS ALLOWED TO RENT**

Rationale: Adding county-imposed artificial scarcity on the number of people allowed to use their property in this way will *increase* the value of the rationed STRs and increase home prices.

- The correct remedy for housing cost increases because of high demand is to multiply the number of available locations for homes, rentals, short term rentals and to drive down the cost by saturating the market—not by increasing the scarcity.
- To improve housing and reduce the cost, zone more areas for all different kinds of uses. Create new zones explicitly for short term rentals and make their development fast and their infrastructure affordable to drive the inappropriate use of residences into more suitable areas.
- The enforcement of a sum-zero number of units in some areas is going to be extremely time-consuming, litigious, and likely impossible for the county to enforce.
- Connecting the number of STRs to the number of artificially low rental rate properties is a capricious limit on property use. If it is in the county's interest to expand subsidized housing, the county should simply pay for it rather than force a legitimate economic enterprise to subsidize it by permit requirements.
- The inconvenience of the rare “bad neighbor” among STR rentals does not justify a property right “taking”
- This cap unfairly applies to only one kind of property use.

17.105.030 Allowance of short-term rentals.

~~(1) Within Urban Growth Area—Small Towns, pursuant to Chapter 17.17 LLC, and Type I LAMIRDS, which is land designated Small Town Mixed Use (STMU), Rural Residential Center (RRC) or Commercial Crossroads (CC) on the official zoning map, no more than 25% of the total existing dwelling units within each separate urban growth area or Type I LAMIRD may be provided as short term rental. Existing dwelling units are determined by land use categories, as updated annually by March 1 by the Lewis County Office of the Assessor.~~

~~(2)~~

~~(3) Where there are four (4) or more dwelling units on a single parcel, no dwelling units may be provided as short term rental, except if the requirements of 17.17.210(1) have been met. For the purposes of this subsection, a detached bedroom shall be considered a dwelling unit.~~

~~(4)~~

**AMENDMENT 004
SIGN REQUIREMENT****Rationale:**

- The standards for short term rentals should be no different than for long term rentals, businesses, or homeowners.
- Requiring this self-label of commonly unoccupied property invites break-ins and robberies.
- Applying this expectation to one kind of economic enterprise appears to stigmatize certain property uses.
- The expectation that the number be someone in Lewis county unfairly targets only one of many possible absentee property owners with mandates and disclosure.
- Lewis county already requires addresses to be posted on the outside of buildings.

Example of the problem of the current language: If I have a private location which is has a sign indicating that this is typically unoccupied out of tourist season, I will face more risk of robberies and break-ins. Likewise, if neighbors have decided to campaign against STR property owners, requiring the label and phone number invites harassment that other neighbors don't face.

17.105.040 Standards.

(6) ~~The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road. Local means within Lewis County.~~

(7)

**AMENDMENT 003
PROOF OF SOLID WASTE COLLECTION CONTRACT**

Rationale:

- The standards for short term rentals should be no different than for long term rentals or homeowners.
- Proof of “solid waste collection” is not possible in most Lewis County locations.
- The temporary use property owner has a higher interest in presenting the property free of trash than long term renters, yet they are not held to this kind of standard.
- Lewis county already has code enforcement power for solid waste left outside of buildings.

Example of the problem of the current language: If I have a cabin in the woods with a dumpster that I periodically take in to the landfill because it is too remote for any formal service, that would make using it as a short term rental illegal.

17.105.040 Standards.

~~(7) Solid waste shall be stored in completely enclosed and secured receptacles and shall be stored indoors.~~

~~(8)~~

(2) To obtain a permit, the property owner or agent authorized to act on the property owner's behalf shall demonstrate that all of the following are met:

~~(d) There is solid waste collection during all months the dwelling unit or portion thereof is provided as short term rental.~~

**AMENDMENT 002
USING SHORT TERM RENTALS FOR COMMERCIAL EVENTS**

Rationale:

- The standards for short term rentals should be no different than for long term rentals or homeowners
- The county should not take on the liability for shutting down gatherings of only a very few of the properties in the county.

Example of the problem of the current language: If I have a large home and grounds that a church group wants to use as for a retreat or conference the county should not shut it down because the underlying property was licensed as a short term rental and ignore other similar assemblies which might have paid for use of a property.

17.105.030 Allowance of short-term rentals.

~~(6) Short term rentals shall not be used for commercial events, such as a wedding venue.~~

**AMENDMENT 001
USING RV PLACEMENT STANDARDS RATHER THAN MANUFACTURED HOME
STANDARDS FOR RV/PARK MODEL/MOVABLE TINY HOMES**

Rationale:

- The standards for “permitted as a residence” is an inappropriate expectation since it is essentially the mobile home installation standard. It unreasonable requires:
 - Removal of axles of trailers and disable all possibility of moving
 - Blocking to code for mobile homes including towers of blocks on the exterior of both sides of every opening in the walls
 - Hurricane tie downs
 - A formal stamp from a certified manufactured home installer
- For a short term stay the standard should be no different than if someone were going camping.

Example of the problem of the current language: If I have a plot of ground with a camp trailer site under a cover, on approved septic and well that I use for hunting season it should not be illegal to allow another to use it for hire.

17.105.030 Allowance of short-term rentals.

(5) Recreational vehicles or yurts shall not be provided as short-term rentals except those that are permitted as a residence are served by an adequate water supply and a sewage disposal system which comply with the requirements of the Lewis County board of health, and the building section or as allowed in a RV park or campground.

17.105.040 Standards.

(2) The short-term rental other than recreational vehicles or yurts shall obtain a building permit as a residence, pursuant to Title 15 LCC.

[tents or treehouses or other outdoor camping arrangements should also be excluded]

From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Lewis County Contractors Opposed to Draft STR Regulations as Written
Date: Monday, July 7, 2025 3:41:38 PM

Hello,

On behalf of local contractors that work to build new houses in and around Ashford, Wa, I would like to submit a proposed amendment to the short term rental regulations and request that each member of signed letter be recorded as a separate community member opposed to the short term rental regulations as currently written.

Nickolas Neville

To Whom It May Concern,

I am writing to respectfully propose a revision to the proposed short-term rental (STR) regulations: specifically, to include an exemption from STR density caps for new residential construction completed in 2021 or later, allowing these properties to operate as STRs for a period of 15 years from the date of completion.

This policy would advance several important community goals:

1. Encourage Housing Growth and Economic Development

A 15-year exemption for new construction creates strong incentives for ongoing residential development—critical in addressing the housing shortage in our region. Each new home built contributes to the local tax base, creates construction jobs, and supports small businesses that rely on a healthy tourism economy.

2. Protect Economic Value and Support Builder Confidence

By ensuring newly built homes can be operated as STRs for a defined period, this exemption helps preserve the financial viability of new housing investments. Without this assurance, builders and homeowners may be discouraged from future development, stalling much-needed housing supply.

3. Prevent Financial Duress and Market Destabilization

Many property owners have invested in new construction specifically with the intent of operating as short-term rentals. Imposing retroactive limits without a reasonable transition period could force these owners into financial distress, leading to foreclosures or distressed sales. A 15-year exemption provides a critical buffer that prevents this kind of economic shock, helping to stabilize the local real estate market.

4. Create a Pipeline for Future Long-Term Housing

Short-term rentals are often a stepping stone to long-term occupancy. This exemption recognizes the evolving nature of housing use, allowing new units to contribute economically today while leaving the door open for future transition into long-term rentals or permanent housing over time.

This narrowly tailored exemption applies only to new construction, avoiding additional pressure on existing housing stock while encouraging responsible growth. It balances the county's goals of housing creation, economic stability, and tourism support.

Thank you for your consideration. I would welcome the opportunity to discuss this proposal further and contribute to a thoughtful, collaborative path forward.

Sincerely,

Name that you would like signed to letter8 responses

Thomas a Hayden

Terry P. Richardson

Ted Grady

Ted Lind

Anthony olson

Amy Grady

Mark Welsh

Kimberly Mount

Email8 responses

Andyhayden123@gmail.com

Bigstickterry@gmail.com

Majesticloghomes@gmail.com

tedlind662@gmail.com

Tolson5500@gmail.com

Amygrady@aol.com

dooger14@aol.com

Kmount253@gmail.com

Phone Number8 responses

2533031207

2533169151

253-307-5772

3602693158

13608806444

253-225-0185

253-222-7754

253-324-8173

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From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Follow up from 7/8 planning commission meeting
Date: Tuesday, July 8, 2025 9:54:22 PM

Hello,

I sincerely appreciate the Planning Commission staying late into the evening to hear from everyone who came to speak on the proposed short-term rental regulations.

Jason Alves expressed hope that a legacy exemption could be incorporated into the permit cap and that permits would be transferable with the sale of a property.

If such an amendment is included in the final regulations, I would fully support their adoption. I believe the majority of short-term rental owners would also be in favor of the regulations if this provision were implemented.

Nick

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From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Re: Follow up from 7/8 planning commission meeting
Date: Tuesday, July 8, 2025 10:13:48 PM

Hi Mindy,

Could you please forward on this legal analysis that speaks to the state's supreme court precedent on short term rentals falling under residential use to the planning commission?

<https://brandtlawgroup.com/the-current-legal-status-of-the-une-of-short-term-rentals-being-a-residential-use/>

Thank you,

Nick

On Tue, Jul 8, 2025 at 9:54 PM Nickolas Neville <nickwneville@gmail.com> wrote:

Hello,

I sincerely appreciate the Planning Commission staying late into the evening to hear from everyone who came to speak on the proposed short-term rental regulations.

Jason Alves expressed hope that a legacy exemption could be incorporated into the permit cap and that permits would be transferable with the sale of a property.

If such an amendment is included in the final regulations, I would fully support their adoption. I believe the majority of short-term rental owners would also be in favor of the regulations if this provision were implemented.

Nick

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Rebuttal in Support of Short-Term Rental Property Rights

The newly proposed regulations under Chapter 17.105, while well-intentioned, raise concerns for property owners who lawfully use their properties for short-term rentals (STRs). While the intent to protect housing supply, public health, and community character is valid, these regulations, as outlined, represent an overreach that unnecessarily restricts private property rights and economic opportunity in Lewis County.

1. Preserving Property Rights and Economic Liberty

The United States has long upheld the principle that individuals have the right to use their property in lawful, economically beneficial ways. Short-term rentals are a legitimate use of residential property and provide essential income streams for families, retirees, and working-class homeowners. Many residents rely on STRs to offset mortgages, taxes, and maintenance costs, especially in rural areas with limited economic activity. These new limitations-such as occupancy caps, building permit requirements, and bans on accessory dwelling unit (ADU) pairings-directly impede owners' rights to use their land responsibly.

2. Balanced Regulation Already Exists

The standards outlined in 17.105.040 provide a reasonable baseline of safety and operational clarity: building code compliance, visible contact information, waste management, parking, and noise controls. These are fair, enforceable mechanisms that ensure STRs coexist peacefully within communities. Adding restrictive provisions-such as arbitrary caps on the number of STRs within Urban Growth Areas (e.g., no more than 25%) or disallowing multiple STRs on a property with more than one ADU-goes beyond public safety and into land use micromanagement.

3. Housing Supply Impacts Are Overstated

The premise of the new ordinance is to "ensure that short-term rentals are not having a significant impact on residential housing supply" (17.105.010). However, the data cited to justify this impact is not presented in the code. Outside of select neighborhoods like Goat Rocks, STR saturation is minimal and seasonal. Moreover, Section 17.105.030 acknowledges that outside of Urban Growth Areas, no cap is enforced-undermining the claim of housing preservation as a consistent goal. If housing supply truly were the concern, similar restrictions would be applied county-wide, not selectively based on zoning.

4. Unnecessary Limitations Undermine Tourism and Rural Economies

The prohibition of STRs in tents, yurts, or treehouses (unless in RV parks) and the blanket ban on commercial events (such as weddings) remove valuable and unique tourism options that drive economic activity in Lewis County. These creative accommodations are often low-impact, environmentally conscious, and locally operated. Removing them not only limits property owner creativity but also undercuts the county's own stated goal of "encouraging the economic benefits of tourism" (17.105.010).

5. Cap Systems Create Arbitrary Winners and Losers

Limiting the number of STRs in neighborhoods such as Goat Rocks based on a percentage (e.g., 9 out of 37 dwellings) creates inequity. Property owners are subjected to a lottery-style permit renewal process. This artificially limits supply, discourages investment, and reduces housing flexibility. There is also no consideration for owner-occupied STRs versus investor-owned ones, treating all use cases equally without nuance.

6. Reasonable Coexistence Is Possible

Lewis County residents are not calling for unregulated STRs; they are asking for fair and consistent policies that recognize their right to responsibly use their homes. Instead of punitive measures, the county should focus on complaint-based enforcement, education, and best practices-many of which are already embedded in the 17.105.040 standards. STR owners want to be good neighbors and contributors to the local economy. Overregulation alienates them and risks pushing STR activity underground or out of compliance.

Conclusion

Lewis County must strike a balance between preserving community values and protecting the rights of its residents. These proposed restrictions tip the scales too far, infringing upon property rights under the guise of public interest. A better approach is thoughtful regulation-not overregulation-that allows STRs to continue providing housing flexibility, economic resilience, and tourism benefits, while addressing legitimate community concerns through enforcement of existing standards.

Sincerely,

Angela Pappas

July 7, 2025

Lewis County Planning Commissioners
125 NW Chehalis Ave
Chehalis, WA, 98532

Dear Commissioners,

I am writing you regarding the proposed short-term rental (STR) regulations that are included in the current Comprehensive Plan Periodic Update process. I am a full-time resident of Packwood and a registered voter in Lewis County. I am a Land Planner by profession, and have worked for several jurisdictions and navigated through planning processes & regulations in many locations, including Lewis County, Chehalis and Centralia. I live in the High Valley community, a 1960's-era subdivision on urban-sized lots. My husband and I also own a long-term rental as well as a small business in Packwood. As a resident of Packwood, I am concerned about an imbalance between the local housing stock that is available to full-time residents (including seniors, workforce housing, and low-income) and housing stock that is vacant more than it is used (vacation homes, investments/businesses like short-term rentals, etc.). I recognize the important role that short-term rentals play in Packwood – the tourists that they serve visit local eateries, breweries and shop locally, as well as providing local cleaners and tradespeople steady work. However, many of these professions and businesses are unable to attract employees because of the lack of available long-term and affordable housing. Additionally, much of the tax revenue that is generated in the Packwood area does not return to the area to help locals. A balance must be found between accommodating tourists and providing access to housing and other supportive services for those that serve those tourists and others wanting to move to or stay in Packwood permanently.

I have reviewed the proposed regulations and offer the following comments:

- 1) I believe that there is substantial confusion on the differences between UGAs, LAMIRDS, and the rural portions of Lewis County. While I understand the differences between these areas because of my profession, my discussions with locals and local STR owners indicates that they do not have a clear understanding of these differences and where various aspects of this new Code would apply.
- 2) I believe that a 25% cap on STRs within UGAs and LAMIRDS is reasonable. Other “gateway” communities in the U.S. have similar, if not more restrictive, limitations on the number of permits issued per year, including Twentynine Palms, CA; Frisco, CO; Breckenridge, CO; Woodstock, NY; Austin, TX; Bangor, ME; Provincetown, MA
(NOTE: Woodstock, NY also requires “Non-owner-occupied STRs may be rented out a maximum of 180 days per calendar year with no more than 26 weekends or parts of weekends included in that total. Weekends include any time between Friday evening and Monday morning.”)

- 3) In Lewis County and other locations around the United States, unique lodging experiences are available, whether it is camping on a farm, staying in a yurt, teepee, or conestoga wagon, or a different uncommon outdoorsy experience (Harvest Hosts, Hipcamp, etc.). Oftentimes, these types of lodgings supplement their revenue as a working farm, or as a means of supporting the local business. These opportunities provide many people experiences that they would not otherwise have, in wide open places next to a lavender field, lending a hand on a farm, or enjoy scenery not viewable in a traditional neighborhood setting. I do not think that it is necessary to prohibit them in Lewis County, but they should be subject to similar standards as a traditional short-term rental – water and waste disposal (sewage, garbage, etc.), parking, signage, etc.
- 4) I believe that signage on the outside of a STR, including contact name/phone number, as well as the permit number, is important. This may influence guests to be responsible neighbors for their visit, as well as provide a phone number for emergencies (fire, tree/wind damage, etc.).
- 5) As currently proposed, STR permits would be reviewed as a Type I application. In many other jurisdictions with short-term rental regulations, there is a standard notification process, notifying surrounding landowners (within 300 or 500 feet) that an STR application has been received and is in review. A notification process is standard for many other projects (Type II and Type III) in Lewis County, including subdivisions, special use permits and other types of projects that could have an impact on a neighborhood or surrounding properties (traffic, noise, etc.). This process would allow for those directly impacted by a short-term rental to ask questions or provide concerns about a specific proposal. I believe that these proposals should be reviewed as Type II applications, necessitating a public notification/comment process.
- 6) I disagree with the requirement for garbage receptacles to be enclosed and not kept at the road. In my observation, a majority of the cans that are left at the roadside between garbage service days are owned by persons having vacation homes here – they are visiting on weekends or here infrequently enough that they are not able to retrieve their garbage cans regularly. Many STR owners have local connections (housecleaners, maintenance workers, etc.) who are able to bring the can off the road after garbage day.
- 7) I agree with the occupancy limitations as proposed, especially as they relate to on-site septic systems. Public health is not a debatable issue. Many of the residences in Packwood were constructed prior to 1980, and were intended to have seasonal or intermittent uses only. Many of these units are still connected to their original septic systems installed (some unpermitted), which are not capable of handling large groups of users. Also, many residential structures have been modified (some unpermitted) to add bedrooms and additional sleeping space. Antiquated, undersized septic systems cannot handle constant overuse and abuse.
- 8) Many towns that have adopted STR caps do not allow the permit to carry with the sale of the property. I agree with this idea – perhaps a new owner will not want to continue use of the property as a STR. Additionally, the permit would become

a commodity that would further increase the asking price for homes, which would make purchase of a home for locals even more out of reach.

On a personal note, I live adjacent to a frequently-booked short-term rental, which has been used as an STR by both the previous and current owners. Guests have repeatedly trespassed into our yard, stolen firewood, have loud outdoor events, and “party lights” left on all night every night – even when vacant. And this is just our property – there are at least 15 known short-term rentals in our neighborhood alone. Guests at other STRs in our neighborhood park in the road – which prevents emergency vehicle access; trespass onto properties; have large fires (even during burn bans); and damage our creek buffer by removing vegetation and armoring. Packwood has an abundance of short-term rentals – more than 400 by some counts. Not all of these are high-performing businesses. I support retention of the quality STRs that have firm rules and are an asset to our community. By recommending regulations relating to public health, safety and permitting, I believe that the high-performing STRs will comply with the rules and requirements to ensure their continued success.

Consider what it would be like if you had an active short-term rental next to you. I implore you strongly consider the testimony of Packwood residents and Lewis County voters. Many locals are fearful to speak up or participate in the public process because they believe that their voices will not be heard because they don’t have fancy degrees or enough money or speak eloquently. If you look at the ownership of a majority of the properties located in and around Packwood, you will see that our community is overwhelmingly owned by people that do not live here, and they definitely do not vote here.

I cannot speak to the specific issues regarding STRs in other communities in Lewis County, and the Packwood Subarea CAC has offered regulations specifically addressing STRs in the Subarea boundary. But regarding properties that surround Packwood, please consider the people that live and work here, and recommend approval of regulations relating to the short-term rentals in all of Lewis County.

Thank you for your time and consideration.

A handwritten signature in black ink, appearing to read "Kim Pawlawski". The signature is fluid and cursive, with a large loop at the end.

Kim Pawlawski
209 Crescent Beach Drive
Packwood, WA 98361

July 1, 2015

Lewis County Planning Commission
c/o Lewis County Community Development
2025 NE Kresky Ave
Chehalis, WA 98532

To Whom It May Concern,

As a short-term rental (STR) owner in Packwood, I write in strong opposition to the proposed regulations outlined in Chapter 17.105. These policies impose excessive restrictions that are unsupported by data, harmful to the local economy, and developed with insufficient regard for public input. Below, I provide a detailed response supported by research, case studies, and firsthand experience.

1. Lack of Data-driven rationale

The proposed regulations overlook key data and public input from local stakeholders.

- **Community Feedback Overlooked:** Community-informed recommendations have been entirely omitted in the proposed language. This disregard undermines public participation and wastes both county and citizen resources.
- **No Clear Connection Between STRs and Housing Availability:** With Lewis County's vacancy rate at 4.2%—above the state average—there's little evidence to support the idea that short-term rentals are driving local housing shortages. In fact, a 2023 Urban Studies report examining 200 rural counties found no meaningful relationship between the number of STRs and reduced housing availability in areas where vacancy rates exceed 3%.

2. Economic Disruption to the Local Community

The proposed rules pose a **risk to community livelihoods** by reducing income opportunities.

- **Loss of Local Jobs:** My single STR directly supports several part-time jobs including housekeepers, snow removal personnel, and local service providers. A 2024 Cato Institute study shows rural STRs typically generate **3–5 part-time jobs per property**—vital employment in small communities.
- **Reduced Local Spending:** Guests routinely ask for local recommendations and contribute over \$200/day per group to restaurants, shops, and services. According to 2023 data from the Washington State Department of Commerce, STR guests spend **40% more in rural communities** than hotel guests.
- **Overburdening Small Operators:** The annual renewal requirement (§17.105.050(3)) and 24/7 in-county representative mandate (§17.105.040(6)) would force an estimated **60% of small operators to shut down**, according to a Penn State study on rural STR regulations.

3. Unsupported and adverse policy actions

The proposed limits are neither evidence-based nor reflective of effective policy outcomes.

- **25% Cap in UGAs** (§17.105.030(1)): After San Juan County imposed a 10% cap, tourism-related tax revenue **dropped 30%**, while housing shortages persisted due to other structural issues like utility and sewer access.
- **Bans on ADUs and Multifamily STRs** (§17.105.030(2)(3)): Breckenridge, CO, revoked similar bans after finding **40% of ADUs went unused**, lacking rental income to make them viable.

4. Proven Alternatives

The county has an opportunity to consider alternative approaches that are already showing positive results in similar communities.

- **Fee-Based Funding Models:** Aspen, CO, implements a **1.5% STR fee**, generating **\$8 million annually** to fund affordable housing—without reducing STR inventory.
- **Safety and Complaint-Driven Programs:** Bend, OR, uses a safety certification and complaint-based enforcement model that reduced community issues by **70%**, all while maintaining tourism and housing balance.

Conclusion

The proposed draft of Chapter 17.105 feels overly broad and could unintentionally hurt Packwood's local economy and sense of community. It overlooks important data, community feedback, and proven solutions that have been created in other rural areas. I respectfully ask the Lewis County Board of Commissioners to take a closer look and consider more thoughtful, well-researched alternatives that better fit the needs and character of Packwood.

Respectfully,



Denise Shoot

108 Lake Creek Dr.

Packwood, WA

denishshoot@comcast.net

From: [Ryan Southard](#)
To: [Mindy Brooks](#)
Subject: Testimony
Date: Monday, July 7, 2025 3:56:09 PM

Hi Mindy,

Here's my written testimony for tomorrow's hearing:

My name is Ryan Southard, and my wife Val and I are full-time residents of Packwood. Since 2015, we've owned and operated six vacation rentals here. I serve on the Lodging Tax Advisory Committee.

In our prior careers, Val was an affordable housing developer in New York and Seattle, while I consulted with public housing authorities and agencies responsible for preserving low-income housing. Between us, we have nearly 30 years of experience in affordable housing development and preservation.

Since relocating to Packwood and entering the short-term rental (STR) space, we've heard the familiar argument: that STRs displace long-term residents and undermine the character of the community. The underlying assumption is that if STRs were capped or reduced, some percentage of those homes would re-enter the market as affordable long-term rentals.

As professionals deeply familiar with the economics of affordable housing, we find that argument perplexing. We've run the numbers countless ways and we always arrive at the same conclusion: to offer a single-family home at an affordable rent demands a level of financial sacrifice and risk tolerance that simply isn't realistic for any but the most altruistic property owners. Therefore, the idea that limiting STRs—either by neighborhood or at the level of an individual property—would meaningfully increase affordable housing inventory in Packwood, is deeply flawed.

That said, we fully acknowledge the need for more affordable housing. To that end, Val and I have invested significant time and energy to both define the problem and pursue real solutions. In 2023, Val led the effort to secure a state-funded technical assistance grant to pay for a housing study in Packwood. We were also both active in Livable Packwood—she as a board member—until she was nudged out ungraciously for her and my ties to tourism-related organizations.

I mention this not out of grievance, but to illustrate the larger contextual problem with these regulations and the discussions surrounding them: That is, the persistent, widely held assumption that tourism and affordable housing necessarily exist in a zero-sum clash of winners and losers. It's a notion borrowed from densely urbanized and far-flung housing markets that bear little resemblance to Packwood; it's overly simplistic; and the regulatory remedies it calls for would do virtually nothing for the people they're ostensibly designed to help. Conversely, they would do plenty to hurt the very businesses that employ them.

The BOCC has an opportunity to shift the tone and focus of this important discussion, towards a baseline understanding of economic realities, and an eye towards solutions that channel rather than suppress Packwood's rising popularity, in ways that actually deliver the greatest good for the greatest number.

To that end, I urge you all to start by opposing these regulations as written.

Thanks,

Ryan

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Letter to Lewis County Planning Commissioners Regarding STR Limits

Concerns from a Local Contractor and Community Member

Dear Lewis County Planning Commissioners,

I am writing to express my deep concern regarding your proposed action to limit short-term rentals (STR) throughout Lewis County. As a resident and business owner in the area, I have witnessed firsthand the essential role that STRs play in sustaining our local economy and supporting small businesses like mine.

As a general contractor serving both homeowners and STR owners—primarily as a licensed and bonded handyman in the state of Washington—I rely heavily on consistent business from STR operators. The areas targeted by these extreme restrictions will directly impact people like me, who depend on the steady work generated by the vacation rental industry. This, in turn, allows me to serve the broader community, including regular homeowners who also benefit from accessible and reliable services.

Lewis County is a cherished vacation destination, offering visitors the chance to experience our natural beauty and vibrant local culture. Guests who come here seek safe, clean, and comfortable accommodations—something that STRs consistently provide. The unique attractions of places like Ashford and Mineral make these areas especially reliant on tourism, as there are few other businesses that operate year-round on the same scale as those tied to vacation rentals.

While I understand the need for reasonable regulations, I firmly believe that an arbitrary cap of 25 % STRs would be a grave mistake. Such a low limit will not address the housing shortage in our region. Instead, it will hurt local workers and entrepreneurs who depend on the steady stream of visitors and the economic vitality that STRs bring. Most residents in these areas are directly or indirectly connected to the vacation industry, and severe restrictions could jeopardize their livelihoods.

In summary, I urge you to carefully reconsider the proposed cap and seek solutions that support both community needs and economic opportunity. Reasonable rules are important, but overly restrictive measures risk long-term harm to our county's residents, businesses, and visitors alike.

Sincerely,

Robert L White

V.R. Services

From: [Zach Zimmerman](#)
To: [Mindy Brooks](#)
Subject: Written testimony for 7/8/25 hearing
Date: Tuesday, July 8, 2025 6:02:17 PM

Ms. Brooks,

Please see my written testimony below to the Land Commission hearing tonight regarding Packwood regulations. Let me know if anything further is needed for inclusion, thank you.

Lewis County Land Commission,

I'm writing to respectfully oppose a single component of the proposed Packwood STR regulations. The portion I oppose is titled "capacity limit" and is outlined on Page 30 of the Packwood Community Meeting presentation deck from June 23, 2025.

This portion of the STR regulations would disproportionately harm existing property owners with real property containing 2 dwelling units who use such units as STRs.

In my case, I purchased a property 3 months ago that was designed to be a 2 unit STR. I made this very material investment in the Packwood community due to the existing need for STRs.

With the very reasonable goal in mind of preserving units for long term rentals, and encouraging development for that purpose, I would suggest to the Commission that:

- (a) the same goal is achieved with the simple cap on total STR permits by geographic area without imposing this arbitrary dwelling unit cap on existing property owners who made good faith (and in some cases, very recent) investments to serve a need the community has,
- (b) with long term rezoning and sewer construction, long term rental units that are **affordable** to residents and seasonal workers will naturally be constructed over time, and
- (c) this arbitrary limit that's independent of the overall cap likely will prompt conversion of second units in cases like mine into vacation homes, which equally limits supply of long term rentals.

If the Commission elects to maintain the per-property capacity limit for # of STR licenses based on dwelling units, I would respectfully request that the Commission considers including a brief 3-6 month relief window to allow existing property owners already operating 2 STRs on a legal 2 dwelling unit property to apply for and receive STR licenses for both units (assuming the units are already legally constructed, possess occupancy certificates, and meet other STR regs). This would have an immaterial impact on the long term goals of the regulations while protecting existing landowners from arbitrary harm, and also creates no new burden to the community. Not allowing these existing STRs to operate (up to the total cap on licenses) would simply open the door for new investors to purchase other units in the same geographic area to use as STRs, resulting in the same # of STRs, but simultaneously damaging and punishing existing property owners.

I appreciate your consideration as you navigate the many complexities of evolving regulations and development.

Sincerely,
—Zach Zimmerman

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From: [Chris Boustead](#)
To: [Mindy Brooks](#)
Subject: 7/8 Planning Meeting - Feedback/questions
Date: Wednesday, July 9, 2025 1:49:07 PM

Hi Mindy,

I just wanted to send you a follow up and say thank you for your hard work, and for your time and effort at the meeting last night. I also wanted to mention an observation during the commissioners closing statements from last night's meeting.

Jason stated that the commission is "not at all interested in anyone losing anything". He also stated that there would be a plan for growth of STRs in the future.

Those two topics directly affect my situation and I was wondering if there is a plan to discuss them in further detail and/or update language in the 17.105 proposal to detail how each can be accomplished?

We haven't met, but some background on my situation (or you can skip this and I'd be happy to meet for coffee!):

My property in Packwood is not my vacation home, or a second or third home.

I have invested literally every penny I have into this project and community over the past 3 years.

I've learned, first hand, how hard, and how expensive it is to build here in East Lewis County.

My wife and I literally ran out of money trying to build our home here, and had to decide whether to sell, or finish on our own. Now we're living in a borrowed trailer on our property, working our full time jobs for 8-12 hours a day, then working on our home til we can't keep our eyes open most nights. We're doing everything by the book, just trying to complete our house.

One reason we invested in Packwood, aside from the beauty of the area and having friends and family here, is because of the opportunity to potentially operate our home as an STR a handful of weekends a year. But now, in the last two months, we've learned that if we can't finish our home in the next 5-6 months, we might be ineligible to apply for a license by 2026. That's assuming Packwood's STR numbers are already near the cap and that many people who don't currently operate STRs may rush to apply. It seems, we would also likely face an uphill battle beyond 2026 if we ever did want to operate an STR due to the proposed cap.

In hindsight, I wish I had been more proactive in discovering and following the planning commission's work, but as a tax-paying property owner with a valid building permit, it also would have been helpful to receive some kind of early notice about proposals that could impact us so significantly, and so soon.

Contrary to Jason's statements, the proposed regulations as written would result in real losses for me—property value, potential STR income, and even the future path of my family.

We don't have a construction loan, a bank financing our build, or an angel investor. Our hope

was to complete the home, refinance it, pay off credit cards, and set aside enough to start a family.

If these regulations are adopted as-is, not only would they lower our property's assessed value and complicate refinancing, they would also force us to reconsider whether we can afford to stay here and build a life.

I welcome you to stop by if you ever want to see my project! Phone and address are below.

Best,
Chris Boustead
203-506-1223
106 Cottonwood Ln, Packwood

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Lewis County Hearing on Chapter 17-105 – Short Term Rentals
Testimony of Allison Moser, President, Washington Hosts Collaborative Alliance

Good afternoon. Thank you for the opportunity to speak to you today. My name is Allison Moser. I am president of the Washington Hosts Collaborative Alliance. We represent the interests of more than 16,000 short term rental owners across our state.

Our Lewis County members have reached out to us to express their concern about the proposed regulations for short term rentals that you are contemplating, including caps and restrictions. From our perspective, caps such as the 25% cap that you are proposing create a winners-and-losers situation which is inherently unconstitutional because it dictates who can and can't have an opportunity to use their property in this manner. We see in your document that your goal is to ensure that there is an adequate supply of affordable housing in Urban Growth Areas. Operating a short term rental is in fact the way that a home owner is able to afford their own housing.

Further, communities such as Ashford and others in your LAMIRD category are being sustained economically in large part because of the tourism to Mount Rainier. Short term rentals provide a vital accommodation to tourists that would not otherwise be available. Without accommodations, tourism can not flourish and without the economic lifeblood that tourism offers to these otherwise small rural communities, it is unlikely that they will become "urban growth areas" because there will not be an adequate source of jobs and income for people to live there.

The other factor that I would like to draw attention to is that singling out short term rentals for regulations on septic, water, garbage disposal, parking, and occupancy is redundant and seems arbitrarily punitive. These health and safety requirements are already in place and addressed in the existing residential zoning requirements.

In Washington, the typical Host shares one home, helping to provide affordable accommodation options for guests, disperse travel to new destinations, and generate billions in economic activity and tax revenue for communities. It is our hope that Lewis County will continue to fully enjoy the benefits that the host community provides, and that short term rental hosts continue to be welcome here as they are deeply rooted and invested here. We take pride in keeping our properties in pristine condition; and are proud of the goods and services our local shops and restaurant partners provide. We promote them to our guests, and this increased business results in increased sales tax revenue in addition to the substantial tax revenue generated to the rentals themselves.

The members of my group are ready and eager and participate in this process, and to help provide solutions to any challenges that may exist. Thank you.

From: [Richard & Allison Moser](#)
To: [Mindy Brooks](#)
Subject: Washington Hosts Collaborative Alliance written testimony and FB post
Date: Wednesday, July 9, 2025 12:50:57 PM
Attachments: [Lewis County testimony 6-23-25.docx](#)

You don't often get email from richandallibnb@gmail.com. [Learn why this is important](#)

Hello Mindy --

I testified at the Lewis County Planning Commission hearing last night and would like to follow up with a written version of that testimony so you have it for the record. Please find it attached. There are also several Facebook host groups that I either manage or participate. This morning I posted a report of last night's meeting, which I would like to share with you and the Commissioners below.

Sincerely,
Allison Moser, President
Washington Hosts Collaborative Alliance
Cell: 702-308-9797

Facebook post on 7/9/2025

INCREDIBLE TURNOUT AT THE LEWIS COUNTY PLANNING COMMISSION HEARING LAST NIGHT

My husband Richard and I attended the Lewis County Planning Commission's public hearing via Zoom last night. The hearing room was full, the overflow room was full, and there were 83 participants via Zoom. The hearing was scheduled for 6-8 p.m. They extended that to 9 pm, then at 9 there were still people both in person and via Zoom who had not yet gotten to speak (3 min. time limit) and the Commissioners extended to 10 pm.

The meeting finally adjourned at 10:30! I didn't count but I'm sure more than 50 people testified. Of those, only one person spoke against STR's. Many people shared moving personal stories about their family's multi-generational history in Lewis County, their pride in their properties, the huge financial investments they have made relative to their means, and their plans to move/retire there full time. There were also many cleaners, contractors, plumbers, landscapers and other support service folks who came out to testify as well.

At the end of the meeting, all six Commissioners took turns addressing the crowd. They emphasized that they are serving as volunteers, that they have no agenda to screw or cheat anyone out of their livelihood or property rights, that they deeply appreciate the obvious love for Lewis County that so many people demonstrated by taking the time and trouble to turn out and speak. The Commissioners echoed the sentiment that they expend their time and personal resources out of the same love.

They voted to extend the public comment period until July 21 at 4 p.m. Up until then, they will receive and review any and all written testimony that anyone cares to submit. *Testimony can be submitted via email to mindy.brooks@lewiscountywa.gov.* Their next meeting is scheduled for July 22, and they will debate and discuss this issue at that time with the goal of reaching a consensus and voting on what their recommendations will be to the Lewis County Council. While the opportunity to testify will have concluded by that time, it will

definitely be worth watching. I will provide links and meeting location information as the hearing date approaches.

Thank you to all who participated! It was very gratifying to see the host community come together and speak so passionately about their commitment to our industry.

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From: [Hana Abou Ouf](#)
To: [Mindy Brooks](#)
Subject: Lewis County Proposed STR regulations- Testimony
Date: Thursday, July 10, 2025 3:12:07 PM

You don't often get email from h_abououf@yahoo.com. [Learn why this is important](#)

Hello,

My name is Hana Abou-Ouf. My husband and family reside in Gig Harbor, WA, and we own an STR in Paradise Estates in Ashford, WA. We also own a second cabin in the Pierce County portion of Ashford. This cabin was built on a piece of land, that previously contained trash, a run down trailer, and where meth was being made by the squatters who lived there.

I attended the public hearing on 7/7/25, and witnessed all the love, sweat, tears, and time the beautiful residents and property owners of Lewis county have put into their cabins, sharing this lovely piece of our state and Mt Rainier National Park.

I am not here to reiterate all what was said and mentioned at the meeting by all the STR owners.

I am here to urge you all to remember, that history does repeat itself, if we allow it to.

Just as the closure of the lumbar mill in Packwood had devastating effects on jobs and resulted in a major drop in the area's population just recently in 2010, the proposed regulations on STRs could have similar if not more detrimental effects on the local small businesses that depend on the tourism industry to flourish and thrive. These small business owners are all hard-working individual, who take pride in their work and make a living the legal way.

As Meilee Anderson mentioned at the hearing, the attraction in the area won't go away. The affordable housing problem could be possibly solved with these regulations, because affordable housing would not be in demand, as all the locals would need to move in search of new jobs.

Lets not turn Lewis County into another ghost town again.

Respectfully,
Hana Abou Ouf

From: [Joe Loeffler](#)
To: [Sean Swope](#); [Scott Brummer](#); [Lindsey Pollock](#); [BOCC](#); [Mindy Brooks](#); [jacob@chronline.com](#)
Cc: [Rob Maricle](#); [to: Bryan](#); [cc: Mark and Lorie Spogen](#); [Glacken Properties](#); [Joe Loeffler](#); [schuyler.jorgensen](#); [to: Shelly Malleis](#); [Jessey](#); [Jess & Rachael Bouma](#); [Jerry Lowdermilk](#); [Laura Parker](#); [Kimberly Sonderman McKenney](#); [Michael Minahan](#); [Nickolas Neville](#); [Betsy Guerreiro](#); [Kristy Rioux](#); [glanza@comcast.net](#); [Meredith Rasche](#); [kimtaurman@aol.com](#); [Delbert Haight](#); [Annette McCarty](#); [marty1717@comcast.net](#); [Envy Tacoma](#); [Margaret Halter](#); [abwalters96@gmail.com](#); [ahughes808@gmail.com](#); [cabinetman50@gmail.com](#); [Michael Beaupain](#); [Steve Pifer](#); [denishshoot@comcast.net](#); [Sharron Gilbert](#); [shirleyjoaneacker@gmail.com](#); [Stefanie Lince](#); [Fireplace Lodging](#); [Harry's Hideaway](#); [Brenda Atkins](#); [hertingx7@gmail.com](#); [Bob Bailie](#); [karthik](#); [jakehoward77@gmail.com](#); [The Bernards](#); [sherridill@comcast.net](#); [dillbrothers@comcast.net](#); [cranders@fwps.org](#); [Conner Gallagher](#); [Daniel Herbert](#); [Chris Murphy](#); [Fred Morton](#); [howerton_he@msn.com](#); [fcprops28@gmail.com](#)
Subject: July 8 Planning Commission Hearing - Follow Up
Date: Thursday, July 10, 2025 9:17:43 AM

Some people who received this message don't often get email from loeffler.joe@gmail.com. [Learn why this is important](#)

Dear Lewis County Commissioners,

We are writing as a group of short-term rental (STR) owners who have collectively invested in and actively operate more than **120+ STR properties across Packwood and Lewis County**. Together, we represent a substantial portion of the local tourism economy—one that supports jobs, provides year-round income for residents, and keeps small businesses alive during the shoulder seasons.

We are united in strong opposition to the proposed STR ordinance under review by the Planning Commission.

At Tuesday's '*standing-room only*' Planning Commission hearing, more than **80 people signed up to speak**. Only **one** supported the proposed rules. The rest—residents, workers, retirees, and local investors—spoke in clear, direct, and often emotional opposition to a policy that feels rushed, unjustified, and disconnected from the realities in rural Lewis County. We thank the Planning Commission for extending the hearing to four hours to allow more people to voice their concerns.

To their own admission, **staff presented no data to support the effectiveness of these regulations**, and ignored credible research showing that similar rules have failed to reduce housing costs in other cities. For example, **Santa Monica slashed STRs by 60%—rents stayed flat. New York removed 15,000 listings—rents hit record highs**. The core problem is housing supply, not STRs. And restricting STRs will not magically increase the supply of housing - in fact, due to economic factors outside of the County's control, these regulations would likely **freeze the current housing supply in place**.

Compelling, peer-reviewed research sheds light on what we might expect to see from these regulations. A 2024 study published in the *Journal of the Academy of Marketing Science* (“Regulating the Sharing Economy: The Effects of Day Caps...”) found that:

- STR restrictions **lowered host income by 9–46%**, but **did not result in a shift to long-term rentals**, and **had no impact on rent prices**;
- **Tourism demand softened**, reducing both the flow of visitor dollars to rural economies, and related tax revenue.

Even more concerning, to our knowledge, **staff did not consult with a single STR**

operator—not one—in the development of this sweeping policy. And even the Packwood CAC is opposed to STR caps. That’s not good governance. That’s policy made in a vacuum.

And while staff has claimed that “*neighboring counties all regulate STRs*,” this is **deeply misleading**. Most surrounding counties require **self-certification or minimal permitting—not blanket caps, usage bans, or restrictions on ADUs and detached bedrooms**. These provisions are extreme by comparison and would restrict property rights while **dramatically weakening Packwood’s fragile, tourism-based economy, and not addressing housing affordability**.

Let’s also be clear: **STR owners are the kind of citizens Lewis County should want to attract and build around**. These are families who make long-term investments—financial and personal—in this community. They hire local contractors, support small businesses, and often plan to pass their properties down to children and grandchildren. STRs are a form of economic resilience and long-term planning. To disrupt those dreams with hasty, heavy-handed regulation is short-sighted and unfair.

The true solution to affordability is **not limiting what’s already built and discouraging future investments**, but rather **building more housing—especially multifamily units**. Why then do the draft regulations discourage ADUs and detached bedrooms? What has the County or Planning Commission done to ask builders and developers what they need to break ground? Why punish one group without even attempting a market-based solution? These questions need to be addressed before any further regulations strip property owners of their rights.

We stand together, ready and willing to engage with staff and the Planning Commission to find a common-sense approach focused on enabling modest growth, preserving economic stability and **maintaining neighborhood character in Packwood and Ashford**.

We strongly urge the Board of County Commissioners to:

1. **Pause the current rulemaking process around STRs**, while still proceeding with the state mandated planning update; and
2. **Convene a stakeholder workgroup** to look at existing data, explore additional studies, and refine the proposal collaboratively.

The people of Lewis County spoke clearly on Tuesday. Please honor that public input and move forward with a policy that supports—not stifles—our communities.

Thank you for your careful consideration of this important topic.

For questions or more information, I am at your disposal: Joe L. - 206-295-1567

Sincerely,

Concerned STR Owners of Packwood and Lewis County
Representing 120+ properties and hundreds of local jobs

CC: Mindy Brooks, Chronicle Staff



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To: Commissioners Frank Corbin, Jason Alves, Bob Russell, Jeff Skutley, Gretchen Fritsch, Roger Moore, and Staff Mindy Brooks

Re: Lewis County Proposed Code 17.105 Short Term Rentals

Introduction

First, I'd like to sincerely thank each of you for the time and effort you've dedicated to reviewing the proposed short-term rental (STR) regulations. I appreciate your thoughtful consideration of the extensive public testimony shared on July 8th and the many written submissions received. Following the public hearing on July 8th and after further reflection on the oral testimony, written comments, and staff responses, I would like to provide additional input and clarification to my previously submitted comments.

Below, I've outlined my specific feedback on the language proposed in 17.105, including where I disagree and why. Where appropriate, I've offered constructive alternatives to support a more balanced, equitable, and locally relevant regulatory framework.

17.105.010 Purpose

"The purpose of this chapter is to ensure that short-term rentals are not having a significant impact on residential housing supply in Lewis County and are operated in a manner that protects public health and safety, while also encouraging the economic benefits of tourism."

This statement contains a fundamental flaw in logic. It is a classic example of the fallacy known as "begging the question." It assumes that short-term rentals *are* significantly impacting the residential housing supply, yet no data has been presented to support this claim in the context of Lewis County. As written, the regulation frames government intervention as necessary to address a presumed harm, rather than a harm that has been demonstrated through evidence.

Furthermore, this line of reasoning appears to borrow heavily from housing debates in urban areas such as Seattle. Places where high demand, limited inventory, and population density do contribute to affordability challenges. Lewis County, by contrast, is predominantly rural or low-density. In many areas of the county:

- STRs are seasonal cabins, vacation homes, or second residences that are used by families part-time.
- These properties are not suitable for long-term rental due to location, infrastructure, or owner intent.

Applying an urban housing scarcity argument in this context is a false equivalence that doesn't reflect the reality of land use or housing patterns in Lewis County.

Additionally, the idea that removing STRs would increase long-term rental housing is a false cause. Many STR owners have no intention of offering long-term rentals, even if prohibited from operating short-term. Their homes would likely remain vacant, underused, or reserved for personal use. In other words, STRs are not actually reducing the available supply of long-term rental housing, and restricting them is unlikely to improve affordability or access.

No specific local data is cited to justify this portion of the purpose statement. For example, missing information includes:

- Concrete numbers of STRs relative to total housing units in each area. There is conflicting data between what was presented by the County and what AirDNA shows in terms of total available listings in the Packwood area.
- STR occupancy or utilization rates
- Vacancy and rental availability trends
- Documented shifts in housing affordability linked directly to STR growth

Without this data, the policy statement appears to be based on a hasty generalization, applying a broad and potentially burdensome solution to a problem that hasn't been proven to exist locally.

Finally, positioning STRs as a housing threat can function as a red herring, distracting from the true root causes of housing challenges in Lewis County, such as:

- Lack of multi-family housing development
- Limited sewer and infrastructure capacity
- Restrictive zoning policies
- Economic and demographic shifts unrelated to STRs

At best, the regulation addresses a symptom that hasn't been substantiated; at worst, it imposes unnecessary restrictions that could stifle tourism and personal property use and rights without achieving any measurable housing benefit.

In summary, I respectfully urge you to reconsider the framing of this purpose statement. It should be grounded in local data and a clear understanding of rural housing dynamics, not assumptions based on unrelated markets. If housing supply is to be a focus, that conversation deserves its own policy process, one built on real evidence and targeted solutions.

17.105.030 Allowance of Short-Term Rentals

17.105.030(1)

“(1) Within Urban Growth Area – Small Towns, pursuant to Chapter 17.17 LLC, and Type I LAMIRDS, which is land designated Small Town Mixed Use (STMU), Rural Residential Center (RRC) or Commercial Crossroads (CC) on the official zoning map, no more than 25% of the total existing dwelling units within each separate urban growth area or Type I LAMIRD may be provided as short term rental. Existing dwelling units are determined by land use categories, as updated annually by March 1 by the Lewis County Office of the Assessor.”

Disagree

This provision is inequitable, arbitrary, and overly restrictive. Once the 25% cap is reached, new or aspiring STR operators are locked out, regardless of whether they comply with all standards and contribute positively to the community. This disproportionately affects:

- Younger or lower-income homeowners who rely on STR income to afford their homes.
- Part-time residents or new buyers who arrive after the cap is reached.
- Local families who inherit property and want to keep it in the family by using it part-time as an STR.

The cap creates a two-tiered system:

- Those who obtain a permit early enjoy unrestricted use.
- Others, regardless of property quality, location, or neighborhood fit, are permanently excluded based on timing alone.

Moreover, the 25% figure appears arbitrary. Why 25%? Why not 20% or 30% or higher? No supporting data has been presented to justify the specific percentage, nor is there a published analysis of:

- Community impacts by area
- STR density or utilization rates
- Long-term housing availability or vacancy trends in UGAs or LAMIRDS

Applying a blanket cap across diverse communities fails to account for local context. Some UGAs or LAMIRDs may already support higher STR density without adverse impacts, particularly in areas with:

- Tourism-based economies
- Large lot sizes or natural buffers
- Seasonal housing patterns and recreational amenities

Others may have few STRs to begin with, and a 25% cap may unnecessarily hinder future growth and tourism potential.

Additionally:

- A high-quality, low-impact STR could be denied a permit, while a poorly managed one continues operating solely due to timing.
- The rule does nothing to incentivize responsible management or good neighbor practices.
- The cap is tied to the number of existing dwelling units, which discourages development and fails to adjust dynamically as new housing is added, freezing the cap unless updated manually.
- This rigidity suppresses economic flexibility and long-term planning, particularly in rural communities like Packwood that rely on tourism revenue.

Lastly, STR ownership supports local employment, including cleaners, handymen, contractors, landscapers, and property managers. A hard cap reduces these opportunities and would disproportionately affect the working families and small businesses that rely on STR income and that which this proposed code is attempting to protect.

Suggested Alternatives:

While I do not support a cap on STRs at this time, here are more equitable approaches should the County feel that the cap is necessary:

1. Limit by individual, not by percentage of homes
For example, allow individuals to operate up to 2 STRs per person. This prevents over-consolidation by a few entities/individuals while ensuring broad access. As currently written, one person could monopolize permits while others are excluded entirely.

2. Phase-in any cap after monitoring performance
First, implement the proposed standards and enforcement tools. Reevaluate STR impacts after 3–5 years before considering any caps.
3. Use performance-based criteria
Focus on enforcing noise, trash, parking, and safety standards, rather than arbitrary limits. Permits and permit renewals could be tied to compliance history, not caps.

17.105.030(2)

“(2) Where there are up to two (2) dwelling units on a single parcel, no more than one (1) dwelling may be provided as short-term rental. Where there are up to three (3) dwelling units on a single parcel, no more than two (2) dwellings may be provided as short-term rental. For the purposes of this subsection, a detached bedroom shall be considered a dwelling unit.”

Disagree in Part

Parcels with two dwelling units should be allowed to operate both units as STRs, provided they meet all applicable standards. If both dwellings are code-compliant and independently suitable for rental, it is overly restrictive to limit use to just one. This unnecessarily reduces flexibility and income potential for responsible property owners.

17.105.030(3)

“(3) Where there are four (4) or more dwelling units on a single parcel, no dwelling units may be provided as short-term rental, except if the requirements of 17.17.210(1) have been met. For the purposes of this subsection, a detached bedroom shall be considered a dwelling unit.”

Agree

I agree with this limitation as it appropriately distinguishes between single-family and multifamily contexts.

17.105.030(4)

“(4) Short-term rentals shall not be operated outdoors, such as a tent or treehouse, except as allowed in an RV park or campground.”

No Opinion

17.105.030(5)

“(5) Recreational vehicles or yurts shall not be provided as short-term rentals except those that are permitted as a residence or as allowed in a RV park or campground.”

No Opinion

17.105.030(6)

“(6) Short-term rentals shall not be used for commercial events, such as a wedding venue.”

Agree

This restriction helps maintain residential character and minimizes commercial disruptions in residential neighborhoods. If people wish to utilize their property as an Event Center, there is already a County permit process in place for that.

17.105.040 Standards

17.105.040(1)

“(1) The owner or legal representative shall obtain a short-term rental permit from Lewis County Department of Community Development. Permits shall be renewed annually. ”

Agree in part.

See comments under 17.105.050(3) regarding annual renewal.

17.105.040(2)

“(2) The short-term rental shall obtain a building permit as a residence, pursuant to Title 15 LCC.”

Agree

17.105.040(3)

“(3) The maximum occupancy shall be no more than two (2) guests per bedroom plus three (3) additional guests. The number of bedrooms is determined by the approved building permit for the structure. A guest is a person over two (2) years of age.”

Agree

17.105.040(4)

“(4) A minimum of one on-site parking space per bedroom shall be provided.”

Disagree

This requirement is arbitrary, overly burdensome, and inequitable. It imposes restrictions on STR owners that do not apply to other residential property owners, even those in adjacent homes.

- Bedroom count is not an accurate proxy for vehicle use. Guests often travel together, and most STR platforms limit occupancy and require disclosure of parking availability.
- No data has been provided by the County to justify “one space per bedroom” as an appropriate metric. Other potential metrics, such as per guest, square footage, or observed use, could be more realistic.
- Many rural and older homes physically cannot accommodate the parking requirement due to terrain, septic placement, setbacks, or lot constraints. Retrofitting spaces could cost tens of thousands of dollars and may require paving, grading, or tree removal.
- The rule applies regardless of actual use. Even if a 3-bedroom home hosts only two guests, the owner must still provide three full parking spaces.
- There is no such requirement for owner-occupied homes or long-term rentals, which often have equal or greater vehicle traffic, creating a clear double standard.
- Lower- and middle-income homeowners, those with modest homes or standard-sized lots, are disproportionately excluded, while only those with oversized or newer properties qualify.
- STR platforms already allow hosts to manage and limit guest parking through house rules, guest vetting, and reviews.
- Enforcement should focus on real violations, such as illegal street parking or noise complaints, rather than applying blanket infrastructure mandates.

Additionally, according to the Sightline Institute’s statewide study, 90% of Washington jurisdictions require just two off-street parking spaces per single-family home, typically defined as 1,800 sq ft with 3 bedrooms on a 5,500 sq ft lot (see: [Sightline Institute: WA Parking Mandates](#)).

Suggested Solution:

- Align STR parking requirements with existing residential building permit standards (e.g., 2 spaces per single-family residence).
- Use complaint-based enforcement for real issues such as parking violations.
- Penalize actual nuisances (e.g., street overflow, blocking access) instead of preemptively penalizing STR owners for hypothetical impacts.

17.105.040(5)

“(5) The property address shall be posted so it is clearly visible from the road.”

Agree

17.105.040(6)

“(6) The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road. Local means within Lewis County.”

Disagree

This requirement raises serious privacy, safety, and equity concerns:

- Publicly posting personal contact information can expose STR owners or managers, especially women, to harassment, identity theft, and physical threats.
- Visible signage identifies the property as an STR, potentially increasing the risk of theft, trespassing, or vandalism when vacant.
- This requirement does not apply to long-term rentals or permanent residents, creating an uneven standard that unfairly targets STRs.
- Contact information for the responsible party is already collected through the permit process and can be made accessible to emergency services or code enforcement without public exposure.
- Modern STR platforms (Airbnb, VRBO) require 24/7 guest support and emergency contacts, often with stricter response expectations than local laws.
- The “local to Lewis County” restriction is arbitrary and unfairly penalizes second-home owners or residents of nearby counties, even when they can respond more quickly than someone on the far side of Lewis County.

Suggested Solution:

- Require that emergency contact information be provided through the STR permit process and accessible to County personnel only, not the public.
- Allow the use of professional property managers or responsive platforms, regardless of their exact residential location.

17.105.040(7)

“(7) Solid waste shall be stored in completely enclosed and secured receptacles and shall be stored indoors.”

Disagree

This regulation is misguided and ineffective in solving the actual problem: wildlife getting into trash.

- The issue is container quality and behavior on trash day, not whether garbage is stored indoors.
- Most conflicts occur when trash is put out for pickup..
- Many homes in the Packwood area lack indoor storage options such as garages or utility spaces. Forcing indoor storage may cause:
 - Health hazards from pests or odors
 - Fire risks (if stored near heat sources)
 - Code violations

I live in unincorporated King County, outside of North Bend. It is a rural, forested area where no STRs exist, or if they do, they are very scarce. Bear-human conflicts were frequent due to long-term residents leaving trash unsecured. The solution came only after the County and City required the waste provider to issue bear-resistant containers. The problem was never STR-related, it was behavioral and systemic. Singling out STRs ignores that:

- Long-term residents produce more garbage over time.
- Wildlife doesn't distinguish between STRs and other homes.
- This problem affects entire communities, and solutions must be universal.

Suggested Solution:

- Adopt a rule requiring wildlife-resistant containers, not indoor storage.
- Require same-day set-out and timely retrieval.
- Encourage or incentivize lockable trash enclosures such as bear boxes for homes without garages.
- The County should work with LeMay to update its contract to provide bear-proof bins countywide, especially in high-conflict areas like Packwood.

This approach is equitable, practical, and enforceable, and addresses the true cause of wildlife conflicts, which is human behavior, not the existence of STRs.

17.105.040(8)

“(8) A sign shall be posted conspicuously inside the short-term rental with the following information:

(a) The unified business identification number and the Lewis County short-term rental permit number.

(b) Name, address and phone number of the property owner and agent(s) authorized to act on the property owner’s behalf.

(c) A map of the property boundary, indicating access points, adjacent private property or common areas, and any easements, including access easements to shorelines.

(d) A floor plan indicating location of fire extinguishers and all exits.

(e) Instructions regarding waste collection and removal.

(f) Posted quiet times starting no later than 10:00PM and ending no earlier than 7:00AM.

(g) The statement “Occupants shall follow all local burn restrictions.”

Agree

I agree with all of the above requirements as reasonable, safety-focused, and in alignment with state law and best practices.

17.105.050 Permit Issuance

17.105.050(1)

“(1) The short-term rental permit shall be processed as a Type I application.”

Agree

17.105.050(1)(a)-(b)

“(1)(a) All short-term rental owners that obtain a permit prior to December 31, 2025 shall be vested and not subject to the limitations of 17.105.030(1), unless the permit is revoked or relinquished.”

“(1)(b) After January 1, 2026, new short-term rental permits shall be issued on a first come, first served basis.”

Disagree

This provision imposes an arbitrary and unfair deadline that could permanently exclude otherwise qualified property owners from operating a short-term rental. Many individuals, particularly seasonal residents, families, or new buyers, may not become aware of the regulation or its deadline in time to take action. Bringing a property into compliance could require months of preparation, including inspections, upgrades, and gathering documentation, making the December 31, 2025 cutoff logistically difficult for many to meet.

By granting “vested” status only to those who apply before the deadline, the County effectively creates a permanent two-tiered system. Those who apply early are shielded from future limitations, while others, regardless of their property’s quality, location, or compliance, are indefinitely locked out of STR operation. This disproportionately impacts younger buyers, first-time homeowners, and local families who inherit property, as well as second-home owners or part-time residents with legitimate and responsible rental plans.

The December 31, 2025 date appears to lack any supporting data or rationale tied to STR density, neighborhood impacts, or resource availability. Its arbitrary nature incentivizes a “rush to permit” scenario that may overwhelm county staff and result in incomplete, rushed, or poorly vetted applications. Meanwhile, responsible property owners who intend to use their homes thoughtfully in the future, such as upon retirement or seasonally, are unfairly penalized simply because of the timing.

Ultimately, this policy undermines fairness, discourages thoughtful long-term investment, and treats equally qualified property owners unequally based solely on when they apply.

Solutions:

- Allow rolling applications with thresholds that adapt to actual demand and impacts.
- Offer a minimum 18-month grace period for currently operating STRs and for those in construction who had reasonably intended to apply.

- Implement a waitlist, appeals process, or exemption pathway for post-deadline applicants based on property conditions or community need.

17.105.050(2)(a)-(f)

“(2) To obtain a permit, the property owner or agent authorized to act on their behalf shall demonstrate compliance with the following:

(a) The standards listed in subsection 17.105.040.”

Agree, with conditions

This is acceptable only if the standards in 17.105.040 are revised to remove arbitrary, inequitable, or overly burdensome requirements (see previous comments regarding parking, trash storage, and public signage).

“(a) There are working smoke and carbon monoxide detectors and properly maintained and charged fire extinguisher on the premises.”

Agree

This is required under existing state law (RCW 64.37.030 and applicable building codes).

“(b) There is a permitted and properly functioning septic system, sewer connection, or legally permitted wastewater treatment system (e.g., incinerator toilet).”

Agree

“(c) There is an approved water source that meets minimum potable water standards.”

Agree

“(d) There is solid waste collection during all months the dwelling unit or portion thereof is provided as short-term rental.”

Agree, with conditions

The County must ensure its waste service contracts (e.g., LeMay) cover all STR-served areas and include provisions for bear-resistant containers where needed. This is a County infrastructure issue, not solely the burden of STR property owners.

“(e) Proof of paid taxes and fees associated with the property.”

Agree

“(f) Valid liability insurance of \$1 million or more covering the STR use, as required by RCW 64.37.050.”

Agree

Already required under state law.

17.105.050(3)

“(3) Any short-term rental permit shall be renewed annually based on the permit issuance date. Failure to renew within six (6) months shall result in automatic revocation of the permit.”

Disagree

This provision is overly punitive and places an unnecessary burden on both compliant STR owners and County staff. Requiring annual renewals for properties that have demonstrated consistent compliance adds bureaucratic red tape without delivering any measurable improvement in public safety, community well-being, or enforcement outcomes.

Unlike other common licenses, this regulation provides no grace period, late fee option, or pathway to reinstate a permit. Instead, it results in automatic and total permit loss for simply missing a renewal deadline. This level of inflexibility is unwarranted and far more severe than the standards applied to long-term rentals, home businesses, or other residential uses.

A single missed renewal could permanently strip an owner of the right to operate an STR, along with the associated income, which is especially damaging in areas where permit caps are in place. This inflexibility disproportionately affects certain groups, such as elderly or less tech-savvy owners, individuals experiencing life changes like illness or bereavement, and second-homeowners or part-time residents who may not track local administrative deadlines as closely.

Furthermore, the administrative effort required to process annual renewals for every STR adds unnecessary workload for County staff and increased costs for property owners. A more flexible, reasonable approach would better balance compliance, efficiency, and fairness.

Solutions:

- Implement an opt-out structure, where permits remain valid unless and until canceled by the owner.
- Alternatively, shift to a multi-year permit renewal cycle (e.g., every 2–3 years) that includes the following:
 - 6 month grace period with a reasonable late fee instead of revocation.
 - Provide multiple renewal reminders by mail/email before revocation.

- Allow reinstatement for STRs in good standing that unintentionally miss a deadline.

17.105.050(3)

“(3) Any permit issued pursuant to this section is non-transferable; transfer of property to a different owner shall require application for a new short-term rental permit.”

Disagree

Making STR permits non-transferable significantly undermines the market value of properties in tourism-driven communities, such as Packwood, where STR use is a key part of economic viability. When a permit cannot be transferred with the sale of a property, it discourages responsible owners from making long-term investments in maintenance, upgrades, or improvements, knowing that their efforts cannot be passed along to a future owner.

This restriction penalizes both sellers and buyers. Sellers may face a reduced property value due to the loss of income potential, while buyers who intend to continue responsible STR operation are forced to start over, possibly during periods when permits are capped. This creates unnecessary uncertainty, as a compliant and well-managed STR could suddenly become ineligible for continued operation solely because of a change in ownership.

Notably, this level of restriction is not imposed on similar property uses. Long-term rentals, home-based businesses, family childcare centers, and agricultural operations often allow for permit transfers or successorship when properties change hands. Singling out STRs for stricter treatment is inconsistent, inequitable, and ultimately discourages sustainable property ownership and use.

Solutions:

Allow conditional transferability with:

- Updated contact info from the buyer
- A signed statement acknowledging STR rules
- Confirmation of property compliance

This preserves continuity while ensuring accountability.

17.105.050(4)

“(4) A property owner may voluntarily relinquish a short-term rental permit upon written 30-day notice to the Lewis County Department of Community Development

and shall cease all shortterm rental operations on the subject property following affirmation of the permit revocation from the County.”

Agree

This provision is reasonable and provides a clear path for owners who no longer wish to operate an STR.

Conclusion

Thank you again for the opportunity to provide detailed feedback on the proposed short-term rental regulations in Chapter 17.105. I appreciate and support the County’s effort to bring structure to STR activity while balancing community needs, public safety, and economic opportunity. However, as outlined above, several provisions raise serious concerns about fairness, practicality, infringement on property rights, and unintended consequences for property owners and local residents alike who are dependent on the STR economy in Packwood and other tourism-dependent communities.

It is my hope that this input helps guide a more balanced and locally relevant approach. One that ensures accountability without penalizing responsible ownership or deterring positive investment. I respectfully urge the Planning Commission and Staff to reconsider elements that could lead to permanent inequities, economic harm, or unnecessary administrative burden. I encourage a policy framework that emphasizes compliance, flexibility, and fairness over rigid restrictions, and that is rooted in accurate local data and community engagement.

Thank you for your time, your service to our community, and your thoughtful consideration of these comments.

Regards,

Sara Redfield

July 1, 2015

Lewis County Planning Commission
c/o Lewis County Community Development
2025 NE Kresky Ave
Chehalis, WA 98532

To Whom It May Concern,

As a short-term rental (STR) owner in Packwood, I write in strong opposition to the proposed regulations outlined in Chapter 17.105. These policies impose excessive restrictions that are unsupported by data, harmful to the local economy, and developed with insufficient regard for public input. Below, I provide a detailed response supported by research, case studies, and firsthand experience.

1. Lack of Data-driven rationale

The proposed regulations overlook key data and public input from local stakeholders.

- **Community Feedback Overlooked:** Community-informed recommendations have been entirely omitted in the proposed language. This disregard undermines public participation and wastes both county and citizen resources.
- **No Clear Connection Between STRs and Housing Availability:** With Lewis County's vacancy rate at 4.2%—above the state average—there's little evidence to support the idea that short-term rentals are driving local housing shortages. In fact, a 2023 Urban Studies report examining 200 rural counties found no meaningful relationship between the number of STRs and reduced housing availability in areas where vacancy rates exceed 3%.

2. Economic Disruption to the Local Community

The proposed rules pose a **risk to community livelihoods** by reducing income opportunities.

- **Loss of Local Jobs:** My single STR directly supports several part-time jobs including housekeepers, snow removal personnel, and local service providers. A 2024 Cato Institute study shows rural STRs typically generate **3–5 part-time jobs per property**—vital employment in small communities.
- **Reduced Local Spending:** Guests routinely ask for local recommendations and contribute over \$200/day per group to restaurants, shops, and services. According to 2023 data from the Washington State Department of Commerce, STR guests spend **40% more in rural communities** than hotel guests.
- **Overburdening Small Operators:** The annual renewal requirement (§17.105.050(3)) and 24/7 in-county representative mandate (§17.105.040(6)) would force an estimated **60% of small operators to shut down**, according to a Penn State study on rural STR regulations.

3. Unsupported and adverse policy actions

The proposed limits are neither evidence-based nor reflective of effective policy outcomes.

- **25% Cap in UGAs** (§17.105.030(1)): After San Juan County imposed a 10% cap, tourism-related tax revenue **dropped 30%**, while housing shortages persisted due to other structural issues like utility and sewer access.
- **Bans on ADUs and Multifamily STRs** (§17.105.030(2)(3)): Breckenridge, CO, revoked similar bans after finding **40% of ADUs went unused**, lacking rental income to make them viable.

4. Proven Alternatives

The county has an opportunity to consider alternative approaches that are already showing positive results in similar communities.

- **Fee-Based Funding Models**: Aspen, CO, implements a **1.5% STR fee**, generating **\$8 million annually** to fund affordable housing—without reducing STR inventory.
- **Safety and Complaint-Driven Programs**: Bend, OR, uses a safety certification and complaint-based enforcement model that reduced community issues by **70%**, all while maintaining tourism and housing balance.

Conclusion

The proposed draft of Chapter 17.105 feels overly broad and could unintentionally hurt Packwood's local economy and sense of community. It overlooks important data, community feedback, and proven solutions that have been created in other rural areas. I respectfully ask the Lewis County Board of Commissioners to take a closer look and consider more thoughtful, well-researched alternatives that better fit the needs and character of Packwood.

Respectfully,



Denise Shoot

108 Lake Creek Dr.

Packwood, WA

deniseshoot@comcast.net

Kathryn Chatterton

From: Hanaa Abou Ouf <h_abououf@yahoo.com>
Sent: Saturday, June 21, 2025 12:25 PM
To: Scott Brummer
Subject: Proposed STR regulations

You don't often get email from h_abououf@yahoo.com. [Learn why this is important](#)

Dear Commissioner Brummer,

I am writing to respectfully share my concerns about the proposed restrictions on short-term rentals (STRs). As a local property owner and community member, I appreciate your efforts to thoughtfully manage growth, but I believe these proposed measures may have significant unintended consequences.

Permit Burden:

The current proposal for Type I permits, non-transferability, and short renewal cycles adds unnecessary red tape, discouraging responsible, local hosts who are already complying with regulations.

Property Rights:

These restrictions limit owners' flexibility to rent both primary homes and ADUs, even on compliant parcels. This reduces responsible use of existing housing stock and infringes on property rights.

Tourism Economy Impact:

Fewer STRs mean fewer visitors, which directly reduces spending at local businesses—restaurants, shops, and events that rely on tourism for survival.

Redundant Regulations:

We already have regulations for safety items like smoke detectors, septic systems, and parking. Adding new layers is redundant, costly, and unnecessarily burdensome.

Urban Rules Applied to Rural Areas:

These rules seem designed for urban centers and don't fit the unique character and needs of rural communities like Packwood and Ashford.

Lack of Data:

There is no clear data showing STRs are driving reductions in long-term housing availability here. Restrictive action without thorough study feels premature.

Unique Lodging Options Restricted:

Limitations on domes, yurts, and tiny homes are misguided. These unique, code-compliant lodging types are in high demand and help diversify and strengthen the local tourism economy.

Significant Revenue Contribution:

STRs in Packwood and Ashford contribute over \$4 million annually in taxes, supporting hundreds of local jobs. Airbnb and VRBO already collect and remit taxes, directly funding essential county services.

Real Families are Impacted:

Many of us host responsibly as a way to stay in our homes, support our families, and create community-oriented, safe spaces for visitors to enjoy.

I respectfully ask that you consider the following:

- Simplify and streamline the permitting process.
- Allow rentals of primary homes, ADUs, and unique lodging types.
- Enforce existing safety codes instead of adding redundant layers.
- Apply stricter regulations only where real, data-driven issues exist.

Let's work together to promote sustainable tourism, protect property rights, and support the vitality of our mountain communities.

Thank you for your time and consideration.

Sincerely,

Hana Abou ouf

Ashford Wa STR owner and Mt Rainier fan

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Kathryn Chatterton

From: Irene Botero <irene.botero@gmail.com>
Sent: Monday, June 16, 2025 4:42 AM
To: Scott Brummer
Subject: Draconian & unnecessary STR regulations promulgated by the Lewis County Planning Commission

You don't often get email from irene.botero@gmail.com. [Learn why this is important](#)

Dear Commissioner Brummer:

My husband and I are writing to express our complete disappointment in the recent promulgation by the Lewis County planning commission of unnecessary regulations on short term rentals outside of the UGA in the LMRD zones of Packwood, Washington.

These regulations were promulgated after a Planning Commission meeting on May 27, 2025, which was supposed to be a discussion of the comprehensive plan within the UGA of Packwood. If you have not listened to this two hour meeting, the STR discussion begins 38 minutes in. It was spearheaded by Mindy Brooks. Brooks suggested that some very limited STR regulations that she initially proposed be implemented in the UGA area of Packwood could be extended to the LMRD zones of Packwood.

Essentially, the committee discussion morphed into a plethora of proposed regulations on STR's in all areas of Packwood outside the UGA area with absolutely no discussion of the necessity to implement same. Brooks suggested that regulations could be promulgated and issued, and then if anyone was opposed to them, those in opposition could voice their concerns during follow up committee meetings and hearings. The May 27th commission was very cavalier in our opinion, in making up STR rules out of thin air based on rules that exist in other states and areas with zero discussion as to whether there were particular concerns in Packwood justifying these regulations beyond a shoot from the hip approach.

My husband and I have had a family cabin in the Timberline area of Packwood for 23 years. We have rented it out for the past 20 years as Pine Lodge. We have three rooms downstairs which sleep two people per room and an upstairs loft, which has six little twin beds. In short, our cabin houses 12 people; mostly for three couples and 6 kids or less.

One of the regulations announced is to limit the number of people per cabin to two per bedroom; without taking into account, the size of the cabin, the size of the bedrooms, the layout of the cabins or anything else. There was no provision made for grandfathering in any existing STR capacity. Our cabin would then be limited to six people as we only have three bedrooms; the loft is not a bedroom per se. This has not been the business model of our cabin for the past 20 years. We have indoor and outdoor tables that seat 12; and we have a large outdoor area for recreational activities as well as linens, dishes and essentials and supplies that are designed for 12 people.

We regularly host families in our cabin when we use it personally. We use our cabin at least once or twice a month and renting it out has enabled us to maintain it update it, and keep it looking good.

The second and most concerning major issue that we have with respect to the proposed regulations would be that the regulations would prohibit us from renting out our studio, which we built on top of a garage on our lot and completed in December 2023. This is an ADU. We poured our retirement savings into this structure with the idea that we could hopefully pay it off by renting out this two person studio, and that it would start paying for itself after about 20 years. The new regulations prohibit two STR's on one lot. This would be financially devastating for our family and is absolutely not justified in any way.

Beyond these two very draconian and unnecessary proposals is a rule that that STR's have an annual renewable licenses.

STR's are currently required to have business licenses. We have a business license and file our tax reports every year as required by state and federal authorities. Requiring STRS to have a license is just a big money grab by the county. Lewis County already taxes our property at a 25 to 30% higher level than non-STR cabins in Packwood.

Additionally, Lewis County started charging us personal property taxes on items contained & purchased for our cabin about three years ago. We have to file a report and declare all new items purchased and used in our cabin on a yearly basis and the county assesses a particular dollar amount to us because we use it as an STR.

In short; we pay more than our fair share of taxes including lodging taxes such that the additional requirement to pay for a yearly specific STR license is completely unjustifiable.

There was some discussion during the May 27th planning commission with regard to short-term rental owners making money hand over fist that would justify this license fee. The comments made were that owners should just choose between operating their cabin as a business or keeping it as a family cabin. This is short-sighted. The reality for the majority of us STR owners in Packwood is that we love and enjoy using our cabins for personal use. The federal tax code permits using a vacation home personally and renting it out commercially. Renting out our cabins when we are not there enables us to pay for ever increasing maintenance costs.

Additionally, we provide a lot of work for the Packwood locals who we pay to manage our cabin, clean our cabin, sanitize our hot tub, take care of our yard, and continuously perform maintenance work on a year round basis.

There was absolutely no community input with respect to regulating short term rentals in the greater Packwood area before these rules were announced.

At a minimum, if somehow the county goes forward with some or all of these new regulations, I would urge you to please consider grandfathering in the existing guest capacity of current STR's and permitting an additional STR on the same lot if currently rented out as an STR. Completely eliminating an ADU currently used as an STR would be financially devastating for us and other families and would serve no public good. It would also eliminate income from Packwood locals who perform work for this STR.

Thank you for your time and consideration. Pardon any grammatical or typing errors as I am using my cell phone to write this letter a while out of the country.

Sincerely yours, Irene Botero and Joseph, Taiwo, owners of Pine Lodge and The Nest @ Pine Lodge.

206-779-6297.

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Kathryn Chatterton

From: Jordan Hayden <livingessentialwithjordan@gmail.com>
Sent: Tuesday, June 17, 2025 12:54 PM
To: Scott Brummer
Subject: STR Concerns

You don't often get email from livingessentialwithjordan@gmail.com. [Learn why this is important](#)

Dear Mr. Brummer,

It is with great dismay that I even feel the need to write this email. I am in complete shock that there are members of our wonderful county that are intentionally threatening the livelihood of so many people. I have read through your proposed changes for short term rentals in Lewis County multiple times and have concerns with nearly all of them, but for the sake of this email I would like to tell you about my family in particular.

I am a mom of three little ones. Due to the success of a short term rental I can comfortably stay home with my kids, provide them with an amazing homeschool curriculum and raise them up to be successful members of our county. My husband and I were both born and raised in Lewis County. We love this area, love the people and love the opportunities we have been given here. My husband owns a successful construction company run out of Mineral. He works mostly in Ashford, Mineral, Morton and Packwood. Short term rental owners hire him on a regular basis. He does full home builds for them, maintenance, septic systems and more. These STR owners keep their money locally when they hire him. That work is our livelihood and you are currently threatening to take that away from us.

As owners of a short term rental we believe it is of the utmost importance to keep our money in our area. We hire local cleaners and send our guests to all of our county's amazing businesses. I can only imagine what your proposed changes would do to our small town businesses. You are not talking about Starbucks not making it. You are talking about family owned small businesses. Without the business that STR's bring in they will surely be closing their doors in a matter of months.

I am sick to my stomach thinking about these proposed changes and the harm that you are wanting to put upon our small town county members and businesses. I will be at the meeting in Packwood to again express my concerns. I ask that you look at this with open eyes. Hear our stories, feel our fear and if these changes do come about, come into our towns and experience the pain that you have inflicted.

Sincerely,

Jordan Hayden

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Kathryn Chatterton

From: Jake & Katie Hughes <mountainsideretreat107@gmail.com>
Sent: Monday, June 16, 2025 8:38 PM
To: Scott Brummer
Subject: Opposing STR Proposal – Support for Local Businesses & Tourism in Ashford WA

You don't often get email from mountainsideretreat107@gmail.com. [Learn why this is important](#)

Dear Commissioner,

I'm writing to express my concern regarding the proposed short-term rental (STR) regulations under Lewis County Code Chapter 17.105. As a local, self-managed host of a compliant STR in Ashford, I respectfully urge you to reconsider the approach for the following reasons:

1. The permit process creates unnecessary burden.

Type I permitting, non-transferability, and annual renewals add red tape that discourages responsible local hosts. Rather than protecting our community, these measures make it harder for honest families to operate.

2. It threatens our tourism economy.

Fewer STRs mean fewer visitors, and fewer visitors mean less revenue for local businesses. In towns like Ashford and Packwood—where tourism is vital—this has real consequences. Over 1.5 million visitors went through the Nisqually entrance of mt rainier, many of them spending massive amounts of money with those small businesses while passing through.

3. It duplicates existing codes.

Many of the proposed safety and infrastructure requirements (e.g., smoke detectors, septic systems, parking) are already regulated. Creating new layers is redundant and financially burdensome.

4. It hurts local families.

Big investors can absorb compliance costs. Small, local operators like us—who live nearby and manage our own properties—face an uneven playing field under these new rules.

5. It doesn't fit rural communities.

This proposal feels like a one-size-fits-all solution designed for urban areas. Ashford and Packwood are unique mountain towns with different needs, rhythms, and challenges. Limiting STR to 25% in our community will greatly cause a deficit of housing for tourists and locals not to mention the major decrease in property value and houses/cabins going vacant.

6. There's no supporting data.

There is no clear evidence that STRs are significantly reducing long-term housing availability in our area. Let's study the issue before taking major restrictive action.

7. STRs are already generating serious revenue.

STRs in Ashford and Packwood contribute over \$4 million in taxes annually and support hundreds of local jobs. Airbnb and VRBO already collect and remit lodging taxes—meaning STRs are funding essential county services.

What we're asking for:

- Simplify the permitting process not to limit them by 25% in certain areas.
- Allow primary homes, ADUs, domes, tiny homes, and yurts to operate as STRs.
- Use existing codes to enforce basic safety standards.
- Target restrictions only in areas with proven issues, not blanket policies.

We are proud to share our homes and community with visitors and are committed to responsible hosting and giving back to the Community. I hope you'll take our concerns seriously and work with local hosts toward a more balanced, rural-friendly approach.

Sincerely,

Jake and Katie Hughes

Cabin STR Owner in Ashford WA Lewis county

Sent from my iPhone

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Kathryn Chatterton

From: Denise Klempay <dklempay@gmail.com>
Sent: Monday, June 16, 2025 12:39 PM
To: Scott Brummer
Subject: Proposed STR Rules – Concern from a Local Resident & Aspiring Business Owner

You don't often get email from dklempay@gmail.com. [Learn why this is important](#)

Dear Commissioner Brummer,

My name is Denise Klempay, and I'm writing to share my concerns about the proposed changes to short-term rental (STR) regulations in Lewis County. My family and I recently made the life-changing decision to move to this area—we sold everything and purchased property in Morton, Washington, with the intention of building a future rooted in the beauty and promise of our local tourism economy.

In addition to our home, we also own a property that we rent exclusively to travel nurses, doctors, and school employees—providing flexible, temporary housing to the essential professionals our community depends on.

I am currently preparing to launch a small, woman-owned business in the Ashford area centered around locally made goods and high-end outdoor provisions for visitors to Mt. Rainier. However, the proposed STR restrictions threaten the very foundation of that plan by limiting the number of people able to visit and stay in the area.

Some of our key concerns include:

1. Permit burden

Type I permits, non-transferability, and frequent renewals create costly red tape that deters responsible local hosts.

2. Limits on property rights

Owners would lose the flexibility to rent both a home and an ADU, even on fully compliant parcels—an unfair restriction in rural communities.

3. Threat to tourism

Fewer STRs means fewer visitors, which directly impacts local shops, restaurants, events, and small businesses like the one I hope to open.

4. Duplicates existing codes

New layers of regulation on issues like septic, smoke detectors, and parking are unnecessary—these are already addressed in existing law.

5. Harms local families

Large investors can absorb regulatory burdens, but small, community-minded hosts like us cannot.

6. Doesn't reflect rural realities

Packwood and Ashford are not Seattle. Rules designed for dense urban areas don't fit our remote, seasonal mountain towns.

7. No supporting data

There's no clear evidence that STRs are reducing long-term housing availability in this area. Let's study, not restrict.

8. Unfair treatment of domes, yurts, and tiny homes

These unique, sustainable lodging options are perfectly suited for the outdoorsy character of our area. Penalizing them hurts innovation, visitor experience, and local hosts who invested responsibly.

9. STRs generate significant revenue

STRs in Packwood and Ashford generate over \$4 million annually in taxes and support hundreds of local jobs. These platforms already remit taxes that fund essential county services.

10. Real families are affected

For families like mine, hosting has helped us remain in our homes, support our community, and contribute to the region's sustainable growth.

What we're asking for:

- Streamline and simplify the permitting process
- Allow rentals of primary homes, ADUs, and unique lodging types like yurts, domes, and tiny homes
- Enforce safety through existing codes
- Target new restrictions only where real, proven issues exist

Please help us preserve what makes Lewis County so special—its hospitality, creativity, and small-town heart.

Thank you for your time and consideration.

Warmly,

Denise Klempay

216-410-6099

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Kathryn Chatterton

From: Brandon Neville <brandonneville03@gmail.com>
Sent: Saturday, June 28, 2025 6:52 AM
To: Scott Brummer
Subject: Opposition to Proposed STR Regulations in Lewis County

You don't often get email from brandonneville03@gmail.com. [Learn why this is important](#)

Dear Commissioners,

I'm writing today to express deep concern regarding the proposed short-term rental (STR) regulations in Lewis County, particularly as they relate to affordability and economic stability in communities like Packwood.

According to recent wage data, the **average annual income in Packwood is \$59,900**, which translates to a **recommended housing budget of \$1,500/month** using the standard guideline that housing costs should not exceed 30% of gross income. At current interest rates, that budget would support a **home purchase of approximately \$250,000 to \$300,000**.

However, the **median sales price in Packwood is currently \$569,000**—well beyond the reach of average wage earners. This gap raises a critical question:

Is the County prepared to take steps that would effectively force property values down by 50% in an effort to reach affordable housing targets?

Such a scenario would have profound and cascading consequences. Many current homeowners, including retirees, working-class families, and second-home owners, carry mortgage payments significantly higher than \$1,500/month. If regulations prevent these owners from renting their homes to offset costs, they will face serious financial strain. Worse yet, they may be unable to sell their properties at sustainable prices, leading to foreclosures, vacancies, and community destabilization.

Beyond individual hardship, the consequences extend to the broader community. Many HOAs—particularly those with **shared water systems and infrastructure obligations**—rely on dues from all members to function. If a significant portion of owners fall into distress or are forced to walk away from properties due to regulatory pressure, these HOAs may no longer be able to meet their basic operational costs. This poses serious risks to water safety, road maintenance, and other essential services.

The economic ecosystem of Packwood and surrounding communities is deeply interconnected with tourism. Short-term rentals not only provide essential lodging where hotel infrastructure is lacking, but they also help homeowners afford to live, work, and invest in our region.

We urge you to reconsider these proposed regulations. A more balanced approach—one that includes current STR operators in the conversation—can help preserve housing access **without destabilizing the property market, local tax revenue, or community services.**

Thank you for your time and continued service to Lewis County.

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Kathryn Chatterton

From: Lara Wood <lara_r_wood@yahoo.com>
Sent: Monday, June 16, 2025 8:01 PM
To: Scott Brummer
Subject: Proposed Short-Term Rental Regulations

You don't often get email from lara_r_wood@yahoo.com. [Learn why this is important](#)

Dear Commissioner Brummer,

My family and I have owned a home in Ashford for just under a year. While our primary purpose for the property is personal family use, we recently began offering it as a short-term rental when we are not there. Rather than leave the home vacant, we're grateful for the opportunity to share it with visitors while contributing to the local economy.

We were surprised by the scope and sudden nature of the proposed STR regulations. While we fully support the county's goal of keeping our communities safe, clean, and well-managed, this proposal—particularly in its current form—seems more reflective of urban needs than rural realities. It risks creating unintended consequences for small, responsible hosts and for the local businesses that depend on tourism.

As newer owners, we've worked to understand existing county codes and have already encountered difficulty in navigating the current regulatory framework. Adding an additional layer of rules—especially without clear data supporting the need—creates more confusion and cost for everyday families, while favoring large investors who can more easily absorb the burden.

We share your interest in keeping our communities safe and well cared for. But the current proposal, as written, is unlikely to achieve that goal in a balanced way.

We respectfully ask that you consider:

- Streamlining the permitting process to reduce red tape
- Enforcing existing safety and zoning codes rather than creating redundant ones
- Focusing stricter rules only where clear evidence of harm exists

We appreciate your time and hope the county will engage further with local residents to shape a policy that protects what we all value about these communities—without diminishing the opportunity for families like ours to contribute in a meaningful and sustainable way.

Warm regards,

Lara and Dan Wood
267 Paradise Drive, Ashford

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From: [Tim Tom](#)
To: [Mindy Brooks](#)
Subject: 17.105 Short-term rental regulations Comments and concerns 17.105
Date: Thursday, July 10, 2025 4:51:05 PM

You don't often get email from fishingfor100@gmail.com. [Learn why this is important](#)

Thomas S.
Fishingfor100@gmail.com

7/10/25

Lewis County Department of Community Development
Attn: Mindy Brooks
351 NW North Street
Chehalis, WA 98532
mindy.brooks@lewiscountywa.gov

Subject: Comment on Proposed Short-Term Rental Regulations (Chapter 17.105)

Dear Ms. Brooks,

I am writing in response to the proposed amendments to the Lewis County Code regarding short-term rentals, specifically Chapter 17.105. I do so not only as a concerned citizen, but also as someone whose family has proudly and responsibly operated short-term rentals locally for over 20 years.

While I recognize and support the County's intent to ensure a healthy supply of long-term housing and to maintain community well-being, I must express my deep concern over the scope and potential consequences of the proposed regulations. If adopted as written, these rules would devastate my family's business—a business that not only supports our retirement, but also provides employment and stability for multiple hardworking local families.

For two decades, we have provided well-managed, safe, and legal accommodations to visitors, many of whom support the local economy by patronizing local restaurants, stores, outfitters, and services. Short-term rentals are not just a stream of income for property owners—they sustain jobs for local cleaners, maintenance workers, landscapers, tradespeople, and property managers. Capping or severely limiting these rentals, especially in designated areas, will directly threaten those jobs. That means more families—many of them lifelong residents—may be forced to leave Lewis County in search of work.

Additionally, the proposed limit of 25% of total dwelling units in certain zones will severely restrict opportunities for tourism-related economic activity. Tourism is a vital part of our local economy. These changes could have a chilling effect on future investments in the area, discourage responsible ownership, and reduce seasonal revenue for many small businesses that depend on out-of-town visitors.

There is also concern over the transferability clause. Prohibiting the transfer of existing permits when properties are sold or inherited undermines the stability and value of these investments. It penalizes long-term local property owners and deters responsible stewardship of land and housing.

I urge the County to reconsider these provisions and to instead pursue a more balanced approach—one that ensures housing availability while preserving the significant economic and cultural benefits that short-term rentals bring to Lewis County. A more inclusive stakeholder process involving long-time STR operators, small business owners, and local workers could result in sensible regulations that promote compliance and fairness without putting families out of business.

We all want to see Lewis County thrive—but these changes risk doing the opposite.

Thank you for your time and consideration.

Sincerely,
Thomas S.

From: [Irene Botero](#)
To: [Mindy Brooks](#)
Subject: Lewis County STR regulations
Date: Sunday, July 13, 2025 11:19:22 AM

I am writing to ask that the current STR regulations proposed by the Lewis County Planning Commission be stripped from the current regulatory package in order to allow STR owners to provide further input.

Sincerely,

Irene Hartzell Botero
A. Joseph Taiwo

Owners of Pine Lodge and The Nest@Pine Lodge
Packwood, WA
UBI 603418535

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From: [Anika Fortenberry](#)
To: [Mindy Brooks](#)
Subject: Re: Short term rentals
Date: Thursday, July 10, 2025 6:43:37 PM

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Hi Mindy,

My friend sent me the Zoom code and I joined the meeting! I agree with most of the people who talked about short-term rentals. I hope you take time to consider everything.

We spent a lot of time in our RV before we started building our house. We have become acquainted with a few of our neighbors. They have our contact information in case of any noise or complaints, and we have informed them that they can reach out to us at any time.

Thank you for your response, it was my first time being apart of something like that and I found it very interesting!

Have a good weekend,
Anika

> On Jul 8, 2025, at 9:24 PM, Mindy Brooks <Mindy.Brooks@lewiscountywa.gov> wrote:

>

> I'm sorry I didn't see this. I was already at the meeting working on getting people signed up to testify when this came through.

>

> ~

> Mindy Brooks

> 360-740-2610

>

> -----Original Message-----

> From: Anika Fortenberry <nika999@comcast.net>

> Sent: Tuesday, July 8, 2025 5:20 PM

> To: Mindy Brooks <Mindy.Brooks@lewiscountywa.gov>

> Subject: Short term rentals

>

> [You don't often get email from nika999@comcast.net. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

>

> Can you please give me the zoom meeting info for the short term rentals?

>

> We have one in Ashford. We plan on retiring there. The income we make helps us reach the goal sooner. We also employee two individuals. A house manger and a house cleaner. This is there lively hood!

> Thank you,

> Anika

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>

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From: [44alex](#)
To: [Mindy Brooks](#)
Subject: Re STR Complaint - Lewis County Planning Committee
Date: Monday, July 14, 2025 4:19:03 PM

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To Whom It May Concern:

I am 100 percent against the STR explosion that has been happening in our Lewis County section of the Echo Valley neighborhood since 2022. Multiple real estate agents, companies, and private investors have been greedily buying up all the available prime location properties in our residential neighborhood leaving very little for any actual long term residents to purchase. And the rude and rowdy behaviors of most of the STR guests have forced the majority of long term residents in Echo Valley to make quick sales to the badgering STR investors just to escape. It is like living in a drug dealer/motel district now, and the peace is gone from our once beautiful and serene neighborhood.

I have tried to get the word out to other actual residents who are not affiliated with STRs to send in their written responses before the cut off date, but I am being blocked from this by the STR owners and their affiliates because they control the Facebook community groups. I posted the information in the Facebook community groups after receiving an email notice from your Planning Committee that there is still time to send in written statements. However, when I checked on my posts in each group I saw that they are all being held in the pending folders instead of being allowed to post. I posted non related topics with no issues, so they are purposely blocking me from sharing about being able to write in.

I am now literally surrounded by STRs in the Lewis County areas of the Echo Valley neighborhood in Ashford WA 98304. My property is off county in the unincorporated area where I pay taxes to Pierce County, but receive utilities from Lewis County. In the last month a new STR is currently in the process of being built right across the street from my home. And in Fact, almost all of 317th Ave has been taken over by STRs, leaving my only remaining next door neighbor and I surrounded by constant in and out flow of people acting like drug addicts partying or being otherwise rowdy all hours of the day and night, Many of those guests broke the no illegal fireworks laws causing explosions well after the cut off time this 4th of July, 2025. For the past 2 years in a row some STR owners told their guests they could ignore the burn bans for pit fires and the smoke billowed over into my yard - see attached picture. I called the non emergency Sheriff number but they didn't send anyone. I sent a letter to the STR owners, and received a sarcastic letter in response basically telling me my concerns didn't matter to them, and they added a veiled threat of suing me for harassment if I filed complaints against them. The guests of most of the STRs in our neighborhood speed on all the roads and around the heavily foliated curves, in the last 2 months alone I have had to slam on my breaks while leaving and returning to my home on 4 separate occasions because a tourist was speeding around a curve near my home in my lane. They barely missed ramming into my car as they swerved, and not once was there any acknowledgment, or apologetic gesture. There are no speed limit signs in our neighborhood because we are just outside of the county, so the tourists treat our roads as if they can do whatever they want, including riding dirt bikes side by side racing each other as if they are on a race track. It's like the tourists are the so called drug

addicts, the STR owners are the dealers, and the freedom promised to them by the owners is the drug. I have reached to point of hating living here, but am unable to to move because of health and financial reasons, so I am trapped. I and the remaining few neighbors get badgered to sell to the STR investors by phone and junk mail on a weekly basis as they ask us if we would be interested in selling. I fear if something isn't done to cap them all they will turn the entire town of Ashford into an STR tourist town with no complaining residents. They are driving up our property taxes unrealistically, and it just isn't fair that the actual residents are being treated like the bad guys now. The Sheriff department does not come when called anymore unless a felony is being committed, so we are helpless.

Furthermore, The guests of these STRs leave their litter along the roads, but I have seen at least 2 strangers sneakily drop their litter into another neighbor's garbage bins as they were walking by. The STR owners leave their trash bins on the narrow roads near the side creating a daily trash stench until garbage pick up day, and we have to swerve around them whenever we have to come and go from our homes. This also creates a hazard of wildlife, and neighborhood pets getting into their bins. Our roads are so narrow that there is barely enough room for two vehicles to pass each other as it is in Echo Valley. The STR guests park in the road taking up whole lanes, especially when they are having parties. They also park on the dry grass despite that it is illegal due to the fire hazard. The STR guests, and property developers, and STR owners block my driveway on a regular basis so that I cannot safely get out without risk of falling in my ditch because my driveway is narrow so I need to be able to pull out into both lanes to get out safely. Some visitors I get have had to park a block away down the road and walk up to my home just to see me.

I provide a beneficial hobby service to the community when I am able in offering pet sitting service to local Ashford residents, and occasional tourists, mainly for pets that are not able to go to boarding kennels because of separation anxiety issues, but now with the explosion of STRs all along the road I live on I cannot provide a peaceful environment for those pets due to the constant tourists walking past my home, and the chaos of strangers blaring their music from their cars as they speed by, and they blare it while at the properties they are staying at - loud enough for the entire neighborhood to hear it, and exploding fireworks that are loud like bombs, etc.. The tourists have actually walked up onto my property despite the many keep out and no trespassing signs, and beware of dogs signs, trying to pet the dogs in my fenced yard! Some have yelled at my dogs to shut up, and some have even thrown rocks because my dogs bark at strangers who get close to my property now - they never barked like that before this year when the STR explosion hit. How am I supposed to protect my pets when they need to go outside when there is nobody controlling the tourists who now seem to have free run of our neighborhood? I had to put up a gate on my driveway to keep them from trespassing. Whoever maintains the lawn at the recently purchased at 55611, that is currently being renovated to be used as an STR, keeps leaving their grass clippings scattered on my gravel driveway and it is encouraging weed growth there.

Also, there is a piece of property on our road that has private creek access. The owner placed a contingency on it that it is just for long term residents to use so that we have a private place to access the creek away from tourists. But now the STR owners found out about the access and they tell their guests that they can freely use it, now those of us who were able to use it regularly cannot because it is always crowded with tourists. Trying to leave the neighborhood is a nightmare now because of the extra long lines coming and going from Mt. Rainier. I have lived here for 10 years, and have not had ANY of these issues until the last 2 years when the STRs exploded production. Signs were recently placed along Hwy 706, but they don't really help - the tourists just won't leave openings for us to get out unless we keep

creeping forward forcing them to stop, but this is dangerous. I feel like a prisoner in my home now just to be safe from the constant tourists everywhere not caring if they run us over, trample our rights to a peaceful existence, or break fire safety laws, etc. - they are crowding us out of our own neighborhood and need to be capped. They have no business being in residential neighborhoods forcing us to live in constant chaos. I have severe health issues, and my family moved here for my safety to get away from crowds of people. Now, that sense of security and safety has been stolen from me, and I live in daily fear.

I really do not have anything against STRs in general, and I believe they serve a beneficial purpose when moderated and controlled adequately. But, I firmly believe they should never be allowed to operate in residential neighborhoods. People move to neighborhoods to be part of a neighborly community, for peace, and a sense of security and safety, not to be constantly bombarded with rude and rowdy strangers coming and going every day. I have attached pictures of the smoke from an illegal STR pit fire during a burn ban, and of vehicles blocking my driveway regularly, and of cars parking illegally on the road blocking the flow of traffic, and parking illegally on the grass creating fire hazards, and multiple garbage bins along the road on a Monday which is not the pick up day for our neighborhood. I am risking being black balled in the community for speaking up, but I cannot hold my tongue any longer now that I am surrounded by STRs.

Sincerely,

Tonya Alexander

253-281-8185

55615 317th Ave E

Ashford WA 98304

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From: [byron baydo](#)
To: [Mindy Brooks](#)
Subject: Re: STR
Date: Monday, July 14, 2025 10:34:53 AM

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Thank you for getting back to me!

Our STR provides employment to the area and is a benefit to the surrounding businesses. We also have a strict use agreement with our guest to respect the community

I hope we are still allowed because we benefit the Community and also provide a place for people to come and enjoy the mountain

Thank you Byron Baydo

On Mon, Jul 14, 2025 at 8:54 AM Mindy Brooks <Mindy.Brooks@lewiscountywa.gov> wrote:

Hi.

There are currently no regulations regarding STRs in Lewis County. The Lewis Count Planning Commission is considering regulations. You can review those [here](#). You can submit written testimony to me now through July 21 at 4:00pm.

~

Mindy Brooks

360-740-2610

From: byron baydo <byron60827@gmail.com>
Sent: Sunday, July 13, 2025 6:38 AM
To: Mindy Brooks <Mindy.Brooks@lewiscountywa.gov>
Subject: STR

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Hello could you please send me the information on how to obtain a permit for my existing STR that's in Paradise Estates

Thank you in advance

Byron Baydo

253-228-2845

byron60827@gmail.com

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From: [Envy Tacoma](#)
To: [Mindy Brooks](#)
Subject: Table STR rental regulations.
Date: Monday, July 14, 2025 8:31:48 AM

I am writing as a current short term rental owner requesting to table the STR regulations until there can be a fair balanced committee including STR owners on the board as well as gathering of actual data (no assumptions) to base new regulations on.

This has been somewhat of a secretive push through.

We are asking for sensible, well thought out structures to protect the valuable tourism industry of our beloved Packwood, where we all made personal investments & commitments of our own.

I personally bought (with a former boyfriend) an abandoned derelict property that was up for auction 10 years ago.

We purchased a property that was vastly "unsaleable". At the same time we had several neighbors do the same.

These were not the gleaming properties of present day.

These properties took vision & grit, reclaiming previous glory.

At that time there were many such properties. I personally can point to several in my little area. High valley 8/11.

Nearly all of the derelict properties have been purchased & beautified over the 10 years of my own experience.

We have all invested our hearts, time & money into Packwood.

This is my retirement investment. It is also my planned retirement summer home. I have implemented my own slow diligent plan & deserve respect and quiet common sense careful

Planning, not haphazard severe restrictions of government over reach.

Sincerely,

Shannon Thompson

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From: [Joe Loeffler](#)
To: [Mindy Brooks](#)
Cc: [Kimberly Sonderman McKenney](#); [Laura Parker](#); [Michael Minahan](#); [Glacken Properties](#); [Rob Maricle](#); [Nickolas Neville](#); [Betsy Guerreiro](#); [Bryan](#); [Jess & Rachael Bouma](#); [Kristy Rioux](#); [glanza@comcast.net](#); [Meredith Rasche](#); [Jessey](#); [kimtaurman@aol.com](#); [Delbert Haight](#); [Annette McCarty](#); [marty1717@comcast.net](#); [Envy Tacoma](#); [Margaret Halter](#); [abwalters96@gmail.com](#); [ahughes808@gmail.com](#); [cabinetman50@gmail.com](#); [Michael Beaupain](#); [Steve Pifer](#); [deniseshoot@comcast.net](#); [Sharron Gilbert](#); [shirleyjoaneacker@gmail.com](#); [Jerry Lowdermilk](#); [Stefanie Lince](#); [Fireplace Lodging](#); [Harry's Hideaway](#); [Brenda Atkins](#); [hertingx7@gmail.com](#); [Bob Bailie](#); [karthik](#); [jakehoward77@gmail.com](#); [Mark and Lorie Spogen](#); [The Bernards](#); [Sherri Dill](#); [dillbrothers](#); [cranders@fwps.org](#); [cbous1@gmail.com](#); [Becci Pifer](#); [Scott Rose](#); [Daniel Herbert](#); [BOCC](#)
Subject: STR Testimony
Date: Monday, July 14, 2025 2:40:18 PM

To: Lewis County Planning Commission

RE: Recommendation to Remove STR Regulations from Comprehensive Plan Update

Submitted by: Joe Loeffler, on behalf of the STR Steering Committee

Date: July 14

Dear Planning Commission Members,

On behalf of the newly formed STR Steering Committee—representing 120+ Lewis County short-term rental (STR) owners, managers, and community stakeholders—we respectfully request that the Commission remove the proposed short-term rental regulations (Chapter 17.105) from the current Comprehensive Plan update and consider them on a separate track.

This recommendation is grounded in three key considerations:

1. Double down on a collaborative process with key stakeholders

Despite the significant scope and impact of the proposed regulations, to our knowledge, no outreach or consultation was conducted with STR owners or operators during the drafting process. The July 8 public hearing saw more than 80 stakeholders speak—nearly all in strong opposition. That level of turnout speaks to a missed opportunity for early collaboration - but we stand ready and willing to engage fully going forward.

2. No clear goal post or data to support regulation

Planning staff presented no data to support the claim that these regulations will meaningfully improve housing affordability. In fact, rigorous academic research tells a different story. A 2024 peer-reviewed study published in the *Journal of the Academy of Marketing Science* found that STR restrictions had **no measurable effect on rent prices, no shift to long-term rental supply, and a negative impact on rural tourism economies**, including reduced visitor spending and tax revenue.

3. Need for a more nuanced, local approach

We are not New York, Santa Monica, or Seattle. Lewis County's economy is fragile, seasonal, and reliant on tourism from Mount Rainier, Crystal, and White Pass. Policies like blanket ownership caps, ADU restrictions, and limitations on detached bedrooms could unintentionally freeze new housing development, weaken the local economy, and limit tourism—without solving the root problem: housing supply.

To be clear: our group is not opposed to common-sense regulations.

We fully support health, safety, and “good neighbor” standards. Most STR owners are already doing these things—and we welcome a framework that formalizes them. What we oppose are extreme, one-size-fits-all restrictions that would damage the local economy without addressing

the real drivers of housing cost.

We are organized, motivated, and ready to fully engage in a collaborative solution.

Our Steering Committee has been conducting policy research, and gathering feedback from the broader community. We are looking to schedule stakeholder meetings in early August and are eager to work directly with Planning staff, the Commission, and County leadership to craft a more balanced, evidence-based policy that protects both housing opportunity and local jobs.

Our Request:

We respectfully ask the Planning Commission to decouple the STR regulations from the broader Comprehensive Plan update. Instead, we propose launching a dedicated stakeholder process to revisit the issue thoughtfully and transparently.

Thank you for your time, and for your continued service to Lewis County.

Sincerely,
Joe Loeffler
STR Steering Committee

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From: [Matt Morrison](#)
To: [Mindy Brooks](#)
Date: Tuesday, July 8, 2025 5:51:33 PM

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STR Permits in High Valley, Packwood

Mindy,

In reviewing the proposal, I understand that the goal of putting a cap of 25% STR's on specific areas has been identified. I also see that Packwood is very high at nearly 46% of the existing housing units.

Will existing STR owners be able to apply for permits prior to Jan 1, 2026 and be essentially 'grandfathered' as prior existing STR's? Or will there be some sort of lottery or evaluation of existing STR's to only allow for the 25% cap?

Sincerely,

Matt

Matt Morrison
Executive Director
Pacific NorthWest Economic Region (PNWER)
Tel: (206) 443-7723
Cell: (206) 399-4026
Email: matt.morrison@pnwer.org
URL: www.pnwer.org
URL: futureborderscoalition.org
URL: regionalresilience.org

****Please note- PNWER has moved offices! Our new address is 520 Pike Street, Suite 1310, Seattle, WA 98101**
The Pacific NorthWest Economic Region (PNWER) is a public/private non-profit created by statute in 1991 by the states of Alaska, Idaho, Oregon, Montana and Washington, the Canadian provinces of British Columbia, Alberta, Saskatchewan, and the Yukon and Northwest Territories

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From: [Jamie Thomas](#)
To: [Mindy Brooks](#)
Subject: Testimony re: Chapter 17.105
Date: Monday, July 14, 2025 8:27:12 AM

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July 10th, 2025

Jamie A Alonzo
JT Cleaning4U LLC
P.O Box 47
Elbe, WA 98330
jtcleanings4u@gmail.com
253-212-8807

Lewis County Department of Community Development

Attn: Mindy Brooks
351 NW North Street
Chehalis, WA 98532
Email: mindy.brooks@lewiscountywa.gov

Dear Ms. Brooks and Lewis County Planning Staff,

I am writing to respectfully share my concerns regarding the proposed amendments under Chapter 17.105 of the Lewis County Code regulating short-term rentals.

As a local resident and the owner of a small, family-operated cleaning business, these new regulations could significantly impact both my livelihood and my family's economic stability.

Our cleaning business has primarily relied on servicing short-term rental properties throughout Lewis County.

These rentals have provided a consistent stream of clients, allowing us to maintain steady work and support our household without needing to commute outside the county for employment. The potential cap on the number of short-term rentals in Urban Growth Areas and other limitations—such as those on accessory dwellings and multifamily units—may reduce the volume of available properties and, consequently, the need for cleaning services like ours.

Additionally, many of our clients are local homeowners who use short-term rentals as a means to afford their mortgage or supplement their income. These new restrictions could discourage property owners from continuing to operate STRs, and this change would not only affect service providers like us but also limit economic opportunities for numerous residents who rely on this income.

We understand the importance of ensuring health, safety, and adequate housing supply, and we support fair policies that balance those goals. However, I respectfully request that the county consider how these regulations may unintentionally harm small businesses and working families. We urge you to consider flexible implementation or exemptions that protect both community interests and the livelihood of those who depend on STR-related work.

While I understand and respect the County's intention to protect residential housing stock and ensure safety, the implementation of strict permitting rules, occupancy limitations, and percentage caps—especially in Urban Growth Areas—poses a serious risk to the livelihood of businesses like ours that rely heavily on servicing short-term rental (STR) properties. Short-term rentals are a major part of our client base. We provide recurring cleanings, emergency services, and deep cleans between guest stays. If these properties are capped or driven out of operation due to regulatory burdens or uncertainty around permit renewals, it will have a direct, negative impact on our business revenue, staffing, and long-term viability.

Specifically:

- Limiting STRs to 25% in certain zones and allowing permits on a first-come, first-served basis after 2025 could abruptly reduce the number of active rentals in our service area.
- Annual permit renewals with the threat of revocation adds instability for STR owners, which in turn creates unpredictability for service providers like us.
- Permit non-transferability upon sale of a property adds an additional hurdle that may discourage new STR ownership and future business opportunities.

We urge the County to consider the broader economic ecosystem that STRs support—not just tourism, but local service providers, tradespeople, cleaners, landscapers, and handymen. These jobs are often filled by local residents who rely on STR turnover and guest demand for consistent employment.

If Lewis County intends to maintain a strong local economy while managing growth responsibly, we ask that you:

1. Reconsider strict limits or caps in areas where STRs have not shown to negatively

affect housing supply.

2. Offer more flexibility or grandfathering provisions for existing STRs and the service businesses they support.
3. Ensure the permit process is streamlined, affordable, and predictable, so small businesses can plan ahead.

Thank you for considering the perspectives of small, local businesses as part of this important decision.

Sincerely,
Jamie A. Alonzo
Owner JT Cleanings 4U LLC

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July 15, 2025

Dear Lewis County Planning Commissioners;

Thank you for the opportunity to provide testimony on the proposed Short Term Rental Regulations, which are part of the Lewis County Comprehensive Plan Periodic Update.

My wife and I are full time residents in Packwood, having chosen to retire here in our home that we have owned since 1988. We have experienced the ups and downs in the community over the years including the devastation that happened when the Mill closed, causing the permanent population shrunk to less than 400.

The new saving grace for the community is tourism, which is generally embraced by the entire community. This has brought revitalization to the community along with the challenges of meeting and accommodating this new industry. Short Term Rentals are an example of what is needed in the community to meet the needs of tourism. I understand this and am very excited to see some controls being put on this transient housing type that will protect and benefit the community as a whole. Below is a point by point review of the proposed STR regulations that are before you with my thoughts, concerns, and suggestions:

17.105.010 Purpose.

The purpose of this chapter is to ensure that short-term rentals are not having a significant impact on residential housing supply in Lewis County and are operated in a manner that protects public health and safety, while also encouraging the economic benefits of tourism.

I totally agree with this purpose, the highlight being "operated in a manner that protects public health and safety". The STR permitting requirements will address this concern.

17.105.020 Applicability.

This chapter applies dwelling units or portions therefore that meet the definition of "short-term rental" in section 17.10.190.

Concern: "Short term rental" means a lodging use, that is not a hotel, motel or bed and breakfast, in which a dwelling unit, or portion thereof, is offered or provided to a guest for a fee for fewer than thirty (30) consecutive nights and for no more than 180 days during a calendar year." I do not see the need for a 180 day limit. This limits a business owner's ability to run their business while not necessarily adding to the housing stock. After speaking with some STR owners, they told me that they would be "cherry picking" the prime days to operate during the year so that they can reach all seasons and all visitors. The units will sit idle, unused in the interim. I do not think that this helps anyone. If the purpose of the 180 day limit is to allow homeowners to reside in their home for 6 months and then STR their home for 6 months, I think that this is fine, but these folks must get their STR permit, as the classification of the property changes from residential to commercial, and it is unfair to other STRs to operate at a lower tax rate. A business is a business.

17.105.030 Allowance of short-term rentals.

Short-term rentals are allowed as described in Chapter 17.42 with the following limitations:

- (1) Within Urban Growth Area – Small Towns, pursuant to Chapter 17.17 LLC, and Type I LAMIRDS, which is land designated Small Town Mixed Use (STMU), Rural Residential Center (RRC) or Commercial Crossroads (CC) on the official zoning map, no more than 25% of the total existing dwelling units within each separate urban growth area or Type I LAMIRD may be provided as short term rental.

I agree with a cap. If Commissioners have a different, better number, I am fine with that. I caution staff that they come up with a good way of determining and defining "existing dwelling units" which will be an ever changing number.

(2) Multifamily housing may not be provided as short-term rental, except if the requirements of 17.17.210(1) have been met. OK

(3) Where there is a primary dwelling unit and one (1) accessory dwelling unit on a single parcel, only one (1) dwelling may be provided as short-term rental. Where there is a primary dwelling unit and two (2) accessory dwelling units on a single parcel, only two (2) dwellings may be provided as short-term rental.

I disagree with the limiting of STRs on a single property. With a cap and other zoning code allowances on what can be built on a property, the property owner should be able to do as he wishes. If he can meet all of the STR permitting requirements for more than one structure, or two, or three, then so be it. There is a cap, and first come, first serve.

(4) Short-term rentals shall not be operated outdoors, such as a tent or treehouse, except as allowed in an RV park or campground. OK

(5) Recreational vehicles or yurts shall not be provided as short-term rentals except those that are permitted as a residence or as allowed in a RV park or campground. OK

(6) Short-term rentals shall not be used for commercial events, such as a wedding venue. Great! Time and time again, these events have proven to disrupt neighborhoods and cause life and health safety problems.

17.105.040 Standards.

(1) The owner or legal representative shall obtain a short-term rental permit from Lewis County Department of Community Development. Permits shall be renewed annually. OK

(2) The short-term rental shall obtain a building permit as a residence, pursuant to Title 15 LCC. Good in concept. Need clarification for existing dwellings, especially existing dwellings that are conversions from other uses. i.e. garages, shops, sheds, unpermitted additions, unpermitted structures, etc.

(3) The maximum occupancy shall be no more than two (2) guests per bedroom plus three (3) additional guests. The number of bedrooms is determined by the approved building permit for the structure. A guest is a person over two (2) years of age. Good

(4) A minimum of one on-site parking space per bedroom shall be provided. Good

(5) The property address shall be posted so it is clearly visible from the road. Good

(6) The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road. Local means within Lewis County. A problem with "advertising" the nature of the property and possibly "alerting" bad guys of a potential target. Especially since, lets face it, what is the "local rep" going to do?

(7) Solid waste shall be stored in completely enclosed and secured receptacles and shall be stored indoors. Good, but discriminatory. Should be a code requirement for all properties. Refuse company requires refuse to

be at curbside (on county ROW) for them to pick up. So rewrite to state that all refuse containers shall be removed from road frontage within 24 hours after garbage pickup or a fine of \$? Will be levied.

(8) A sign shall be posted conspicuously inside the short-term rental with the following information: **OK with all of below**

- (a) The unified business identification number and the Lewis County short-term rental permit number.
- (b) Name, address and phone number of the property owner and agent(s) authorized to act on the property owner's behalf.
- (c) A map of the property boundary, indicating access points, adjacent private property or common areas, and any easements, including access easements to shorelines.
- (d) A floor plan indicating location of fire extinguishers and all exits.
- (e) Instructions regarding waste collection and removal.
- (f) Posted quiet times starting no later than 10:00PM and ending no earlier than 7:00AM.
- (g) The statement "Occupants shall follow all local burn restrictions."

17.105.050 Permit issuance.

(1) The short-term rental permit shall be processed as a Type I application. **OK**

(a) All short-term rental owners that obtain a permit prior to December 31, 2025 shall be vested and not subject to the limitations of 17.105.030(1), unless the permit is revoked or relinquished. **Big practical problem here, need to rework: These regs will not take affect until late November at the latest. There are 400ish? STRs in Packwood? There is no way that staff can process all of these TYPE 1 permits by 1/1/26. A Type 1 permit must go through:**

Master site review: Building setbacks, septic review, Critical areas review, building separation (fire), etc. In this case, existing structures will need to have site inspections to verify acceptable fire and life safety issues, such as emergency exists, fire extinguishers, smoke and carbon detectors, legal staircases, stuctural integrity, etc. I suggest that this be re-worded to state that "Permit applications for existing STR's shall be made by 12/1/25 and that any STR where a permit is not issued by 5/1/26 shall cease to operate unless an extension is granted by county staff."

(b) After January 1, 2026, new short term rental permits shall be issued on a first come, first served basis. **Change date to 6/1/26 (allowing for existing requesting an extension (above) have opportunity to reach code compliance).**

(2) To obtain a permit, the property owner or agent authorized to act on the property owner's behalf shall demonstrate that all of the following are met:

- (a) The standards **listed** subsection 17.105.040. **OK**
- (a) There are working smoke and carbon monoxide detectors and properly maintained and charged fire extinguisher on the premises. **OK**
- (b) There is a permitted and properly functioning septic system or sewer connection. **OK**
- (c) There is solid waste collection during all months the dwelling unit or portion thereof is provided as short-term rental. **OK**
- (d) Proof of paid taxes and fees associated with the property. **OK**
- (e) Valid liability insurance of one million dollars or more that covers the use of the short-term rental unit as required by RCW 64.37.050. **OK**

(f) *There is a Certificate of Occupancy issued by Lewis County.* Important to show that the county has reviewed the structure for structural and building code compliance and is therefore safe for occupancy, protecting the public's health safety and welfare. Just like any new construction would have to do.

(3) Any short-term rental permit shall be renewed annually based on the permit issuance date. Failure to renew a permit within six (6) months of the permit renewal deadline shall result in automatic revocation of the permit.
OK

(3) Any permit issued pursuant to this section is non-transferable; transfer of property to a different owner shall require application for a new short-term rental permit. *I disagree with this provision. There are STRs that are constructed to be just that, an STR. They are a business, are taxed and valued as such. If we assume that there is a cap, and that cap is reached, the sale value of the property, it's taxing state (ie. Business) can be seriously diminished. Additionally, those people that have invested their retirement income in STR real estate will take a drastic, unfair, loss when passing the property on to their heirs.*

(4) A property owner may voluntarily relinquish a short-term rental permit upon written 30-day notice to the Lewis County Department of Community Development and shall cease all short-term rental operations on the subject property following affirmation of the permit revocation from the County. OK

(5) Failure to obtain and maintain a short-term rental permit, including meeting the standards of subsection 17.105.040 and 17.105.050, shall be processed as a code violation pursuant to Chapter 1.20.

Need to address situation where, for example, an existing permitted STR is going to be expanded or modified. For example, an existing 2 bedroom mobile home is permitted and the owner wants to replace it with a two bedroom stick-built residence. Does he keep his existing permit or must he obtain a new one, and if a new one, and the cap has been reached with a waiting list on file, then what?

In conclusion: I have been actively involved with the Packwood CAC since its inception and have been integrally involved with the process to date. I want to close by applauding each and every Planning Commission member for your dedication to the community and work on this enormous project spending many, many hours in meetings, conferences, and public open houses learning the needs of the community and educating yourselves to be able to make knowledgeable decisions.

Sincerely,



E. Dennis Riebe
117 Robinwood Place
Packwood, Washington

From: [John Steiger](#)
To: [Mindy Brooks](#)
Subject: Re: Lewis County proposed STR regulations
Date: Wednesday, July 16, 2025 8:26:01 AM

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Hi Mindy

I do not see our comments (below) on the list of public comments on your website?? Just wanted to make sure they were received.

John

----- Original Message -----

From "John Steiger" <j.steiger49@gmail.com>

To mindy.brooks@lewiscountywa.gov

Date 7/6/2025 9:38:45 PM

Subject Lewis County proposed STR regulations

Dear Mindy/Lewis County

Our primary objection to the proposed regulations is that they are essentially a "taking" of a part of the value of our property (by limiting our use of it) without reimbursement. While the intent at minimum, is to limit growth in STRs, realistically the regulations will make operating an STR more costly and difficult if not impossible. They will clearly reduce the value of our property.

My wife and I have a home in Packwood. We built our home in 2012. Since retiring, we split our time between Packwood and a seasonal home elsewhere. To enable us to do this financially, we have been renting out our home as a STR rental for part of the year for about six years. We have invested literally tens of thousands of dollars making our property desirable as a STR. In six years, we have we have never had a problem with any of our guests disturbing our neighbors. In fact, it's gratifying to see positive comments from guests from all over the US and the world after they stay in our home and spend a little time in the Packwood area. These are typically not wealthy people. They are often young and our STR allows them the opportunity to sample our beautiful local community in a special way. I think this is a tangible, if hard to measure, benefit to the community.

Beyond the negative and unfair financial impact on us personally, we should all be concerned as to whether limiting/reducing STRs is a reasonable goal of county policy if STRs posed a real problem. Negative impact at the current 25% level has not been demonstrated. Indeed, there is no evidence that the the percent of properties used as STRs will continue to increase. There is actually evidence (lower rents) that the market has reached a saturation point. If so, why do we even need regulations limiting STRs to 25%? Is this the classic "Solution in search of a problem?"

Beyond the lack of need for limiting STRs, clearly some of the proposed regulations or "areas of concern" used to justify the regulations are illogical on their face. For example, the concern with STRs overloading septic systems raise the question, if this is such a concern, why not regulate the number of people who can occupy the other 75% of homes in the area to protect against their overloading of their septic systems. No more large Xmas or July 4th family gatherings? Is there any empirical evidence that this is more of a problem with STRs than other homes in the area? I would really like to see the evidence. In our case, for example, the home is often vacant, obviously resulting in zero impact of the septic. This is just one of many examples I could cite (parking, noise, garbage, drug use, etc.) that are in my experience no more a problem with STRs than other homes in the area. In our five years of welcoming guests we have not had a single bad experience. Most STR owners don't tolerate such behavior because if they do they will soon be out of business.

I'd argue that many of the "justifications" used to support the regulations are more in the realm of urban legend than demonstrable fact. For example, a claim justifying limiting STRs to 25% of available properties is that limiting STRs will increase available "market rate" housing in the Packwood area. I can't speak for others, but WE HAVE ABSOLUTELY NO INTEREST IN RENTING OUT OUR HOME ON A LONG TERM BASIS (GREATER THAN 30 DAYS). There are a number of reasons including that we want to be able to return to Packwood whenever we want, the risks of damage, non-payment of rent, etc. make renting our home an absolute non-starter for us. So the idea that making STR rental so onerous that we would add our home to the pool of local rentals can't be proven.

A area that I don't think has been adequately weighed in limiting ("regulating") STRs is the adverse impact on the local economy. We, for example, pay a percentage of our gross rents to a local Packwood property management company. They in turn hire local people to clean, maintain the property, respond to guest concerns, and handle the rentals of our home. I estimate that our guests alone generate 300-600 "tourist days" staying in our home during which they likely patronize Blanton's, the gas stations, the breweries, White Pass ski area, etc. Multiply this by the dozens of STRs that you will eventually drive out of business and the county will be seriously negatively impacting the local economy. Rather than create more housing, this will reduce local jobs.

The proposal to give existing STRs that "register" before the end of the year preference for permits may be intended to soften the financial blow to existing STRs. Giving existing operators preference, but still requiring, undoubtedly costly "permits" does not in any way reduce the impact of the adverse impact on the value of our properties as a result of these regulations. Especially since the preference does not run with the land and in fact, goes away as soon as the property is sold or inherited.

I WOULD THEREFORE SUGGEST THAT SINCE THERE IS REALLY NO DEMONSTRABLE HARM BEING CAUSED BY THE EXISTING STRs (I certainly challenge the county to demonstrate actual harm), THE LEAST THE COUNTY COULD DO IS GRANDFATHER IN ALL EXISTING STRs TO RUN WITH THE PROPERTY AND APPLY THE NEW REGULATIONS ONLY TO NEW STRs. That way the county can limit the growth in STRs if

it wishes, but without taking a portion of the value of our properties we have often spent years building.

Thank you for the opportunity to comment.

Sincerely,

John Steiger
Lisa Guzman

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From: [Christian Crow](#)
To: [Mindy Brooks](#)
Subject: For new Tax regulations and rules for STRs
Date: Thursday, July 17, 2025 6:57:17 AM

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I am for new regulations due to my beliefs on STRs.

STRs are a direct contributor to the housing crisis in Washington State. Specifically, family size homes, not cabins. I live next to a large STR and I can tell you, they'll get people in there being absolutely loud. Sometimes they'll play loud bass music until the morning hours. It's annoying. The people who own the STR are out of Puyallup. They don't even live in Lewis County. Our Pleasant Valley here in Mineral is getting too loud. At least put more regulations on STRs for conduct.

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From: [Shiloh Reynolds](#)
To: [Mindy Brooks](#)
Subject: Correction
Date: Friday, July 18, 2025 8:03:44 AM

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Hi Mindy! Please accept the following modifications to my statement. I just wanted to recognize my husband as well in our business history in East Lewis County. Thanks! :)

I have been a short-term rental owner since 2018 and have maintained a property in High Valley, Packwood since 2020 (which doubles as my personal family vacation cabin in use by myself and my family used by us every month of the year with rare exception). During this time, and throughout the 21 years I served thousands of visitors and rural clients in east Lewis county through my husband's and my former business, Rivers Coffeehouse and Bistro in Morton as well as my work as a mental health counselor. We also created and maintained 2 Airbnbs in Morton. Our team had never encountered serious incidents involving guests. On the contrary, the vast majority of our guests have been respectful, appreciative, and enthusiastic about visiting our region.

While our bistro has now closed and my other vacation rentals in Morton have been sold to new owners, I continue to operate our remaining Packwood property as Airbnbs when not in use by me or my family. However, this past year has marked a difficult turning point. Despite Packwood's growing popularity as a vacation destination, I've seen a steep decline in income due to the increasing number of short-term rentals entering the market. Competition is up, while demand has not kept pace.

At the same time, Lewis County has increased the assessed value of my property dramatically — from \$344,000 in 2020 to \$1,468,700 in 2025. This is a \$1.12 million increase in just five years, despite only modest renovations and no major upgrades (not even a new roof, which is needed).

In 2024, I listed the property for sale at \$800,000 and reduced the price to \$700,000 over the course of the year. It only received two showings. At the time, the county had assessed the home at \$997,000 — nearly \$300,000 higher than what the market would bear. If the assessed value is so out of step with market reality, something in the valuation process seems fundamentally flawed.

Meanwhile, the operating costs of managing the rental have become unsustainable. Monthly property taxes now exceed \$1,000. Cleaners, supplies, and general maintenance consume roughly 70% of my gross income. Taxes alone have taken \$7,000 this year so far. I used to generate approximately \$64,000 annually from this rental. This year, halfway through peak season, I've grossed only \$20,000 — most of which is absorbed by this overhead.

Beyond my personal situation, I believe Packwood is facing a larger question about its identity and long-term vision. As conversations about affordable housing arise, it's important to also consider the lack of supporting infrastructure for full-time residents. Many essential services still require travel to Yakima or Chehalis, making full-time living here impractical for many — regardless of housing cost.

Packwood is, and has always been, a gateway to Mount Rainier National Park and vast stretches of national forest. It's a rare and cherished destination, valued for its pristine environment, small-town character, and low-density development. I worry deeply about the creeping threat of urban sprawl - of Packwood becoming the next Graham or Spanaway, overtaken by fast development, low-cost housing projects, and strip malls. Once these landscapes are changed, there's no getting them back.

I urge the council to consider the long-term implications of zoning, property taxation, and infrastructure planning. Let's be careful stewards of what makes Packwood special.

Sincerely,

Shiloh Reynolds

From: [Andy Starr](#)
To: [Mindy Brooks](#)
Cc: [Sarah Starr](#)
Subject: Follow Up Written Testimony Regarding SRT Regulations - Starr
Date: Thursday, July 17, 2025 10:38:13 AM

You don't often get email from arstarr91@gmail.com. [Learn why this is important](#)

Dear Mindy and Members of the Lewis County Planning Commission,

Thank you for your continued time and effort on the Packwood Growth Plan including Short-Term Rental (STR) regulations. We appreciate your patience and willingness to extend the July 8th meeting so everyone's oral testimony could be heard.

We want to acknowledge the hard work that has gone into the overall Packwood Growth Plan. We've watched Packwood change a lot since we started visiting when we were kids. We understand this is a complex issue which requires thoughtful solutions to manage growth, preserve the character of the community, and plan for the future.

That said, we are writing again to highlight a perspective that we hope is considered in this phase of planning: those of us who are actively under development. We purchased an empty lot in Packwood in 2019. After years of saving, planning, and preparing, we just closed on financing to build our home. Construction is scheduled to begin this summer and expected to be completed around this time next year. Due to our current jobs, we can't live in Packwood full time yet and having the option to rent short-term has always been part of our plan to make this financially viable for us. We currently rent an apartment and this will be our first home.

Under the current draft regulations, we are very concerned that the 25% cap will be reached before our home is completed. Based on the numbers presented, only a small number of additional permits remain. If no allowances are made for those in active construction, we risk missing out on the same opportunity afforded to neighbors who were simply able to build a little sooner. That difference could have lasting financial consequences for families like ours.

We respectfully urge the Commission to do two things:

1. **Extend the grace period to at least 12 months or more**, to allow those already under development a fair chance to apply for a permit.
2. **Re-evaluate the 25% cap**, particularly how it impacts owners who are already invested and committed to Packwood, but haven't yet had the opportunity to complete their build.

We are excited to be planting permanent roots in a community we grew up visiting with our friends and family. Thank you again for your work and for considering the voices of those families actively investing in the community's future.

Sincerely,

Andy and Sarah Starr
144 Bugle Lane
Packwood, WA 98116



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Written Testimony for July 22 Planning Commission Meeting

To: Lewis County Planning Commission

Submitted by: Michael John Beaupain

Property: 250 Snyder Rd, Packwood, WA 98361

Phone: 301-767-7823

Email: mickbeau1@hotmail.com

Dear Planning Commission Members,

Thank you for your time and service to the residents and property owners of Lewis County.

My name is Michael John Beaupain. I am a member of the U.S. Foreign Service and I own a single property at 250 Snyder Road in Packwood. Although I am currently stationed in Washington, D.C., where I rent a home, this property is my only residence and my long-term investment in Lewis County.

I use this home as a short-term rental, not as a business empire, but as a way to help offset my rent and keep the house from sitting vacant. I am not trying to turn a major profit—only to maintain the property and pay for its upkeep.

However, in recent years, I've found myself facing ever-rising property taxes and increasingly complex county requirements that are both financially and logistically burdensome. These processes—while perhaps designed to target large STR operators—end up hurting small, responsible owners like me. Larger operators can afford legal and accounting help. I cannot. I am simply trying to keep up, and it is becoming more and more difficult.

I do not object to paying taxes. I support reasonable, transparent processes that ensure everyone contributes their fair share. But I am asking the County to take into account the unintended consequences of over-complication and disproportionate burden on individual homeowners who are trying to do the right thing.

Please continue to prioritize simplicity, fairness, and clarity in your policies—and recognize that many STR owners are not large companies, but working professionals like myself, doing our best to be good stewards of our homes and our community.

Thank you for your consideration.

Sincerely,

Michael John Beaupain

From: [Karli Devoe](#)
To: [Mindy Brooks](#)
Subject: Re: Packwood STRs
Date: Monday, July 21, 2025 3:57:43 PM

Testimony of Karli Devoe, Packwood resident, for Lewis County Planning Commission meeting on July 22nd, 2025

Karli Devoe
120 Edmonds Rd
Packwood, WA 98361
360-888-2818
karlidevoe@gmail.com

To my previous testimony, I would like to add the following:

-I have a business license issued to my address at 120 Edmonds Rd which is currently STMU, and am currently working on building a retail candy/books/antiques/stationery store with an attached commercial kitchen for making artisanal chocolates and sweets. I need the zoning in this area to continue to allow for small businesses to function.

-Also, my husband and I are hoping to continue renting transient accommodations, which I believe would also require the zoning on our street to continue to allow for businesses. We rent vintage trailers and the old White Pass Ticket Booth and want to make sure we are able to continue this, as it is currently our main source of income.

Thank you for your time.

Karli Devoe

On Wed, Jul 16, 2025 at 3:31 PM Mindy Brooks <Mindy.Brooks@lewiscountywa.gov> wrote:

Hi.

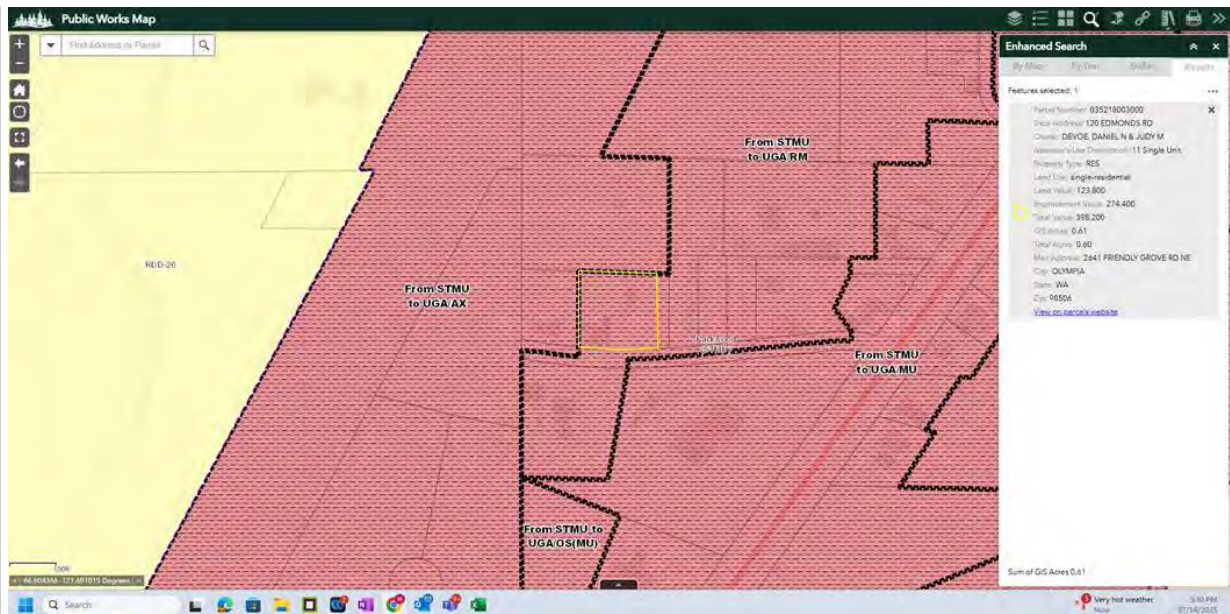
Thank you for providing testimony on the proposed development regulations and for meeting to talk with me about your situation. We spoke about the option of you asking for a different zoning designation. I wanted to provide a bit more information so you can decide if you would like to additionally submit testimony.

The current recommended zoning for your property is to change from Small Town Mixed Use (STMU) to Residential Medium (RM) zone (see map below). The RM zone was proposed for your property and the property to the south of you because staff assumed based on the Assessor data that both were residential uses.

Transient accommodations, which includes motels with detached units, is proposed to be not allowed in the RM zone. I believe your use is most like a motel with detached units because your units – vintage trailer, old ticket booth – are stationary units that you rent out. You could ask to have your zoning changed from RM to Mixed Use (MU) or Airport District (AX), which would allow transient accommodations. However, because we are not allowed to “spot zone” we would need to apply MU or AX to the property south of you as well. You can see the allowed uses for the MU and AX zones in this [proposed Table 2](#) and you can see the proposed regulations in the [UGA – Small Town proposed code](#). AX allows many fewer residential uses than MU. Please note, existing legal residential uses are vested.

If you'd like to have the Planning Commission consider this, please send testimony before 4:00pm on July 21.

Here is the map.



~

Mindy Brooks (she/her)

Director, Community Development

Lewis County

(360) 740-2610

From: [Denette Neville](#)
To: [Mindy Brooks](#)
Subject: STR Regulations
Date: Friday, July 18, 2025 10:53:01 AM

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Dear Commissioner Corbin,

Thank you for suggesting to hold off on the current draft of short-term rental regulations and instead create a steering committee that includes both STR owners and local residents.

I think this is an equitable and fair approach. It gives everyone a chance to be heard and involved in shaping policies that affect our communities. Taking time for open discussion and collaboration will lead to better, more balanced outcomes for everyone—those who rely on STRs and those concerned about their impacts.

I fully support your proposal and hope the Planning Commission sees the value in it too.

Thanks again for your thoughtful direction.

Denette Neville

From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Thank You Commissioner Corbin for Your Proposed Amendment on STR Regulations
Date: Friday, July 18, 2025 9:07:52 AM

Hello Mindy,

Could you please make this part of the written record for 7/22 meeting?

Dear Commissioner Corbin,

I want to extend my sincere thanks for your thoughtful proposal to table the current draft of short-term rental regulations and form a steering committee comprised of both STR owners and local residents.

This approach provides a valuable opportunity for meaningful dialogue and collaborative problem-solving. A stakeholder-driven process has the potential to produce well-balanced policies that reflect the diverse needs of our community—recognizing both the economic benefits that short-term rentals bring to Lewis County and the importance of minimizing any negative impacts.

I fully support this proposal and hope to see it adopted by the Planning Commission. It represents a proactive and inclusive path forward, and I believe it positions Lewis County to be a leader in this space.

Thank you again for your leadership.

Sincerely,

Nick Neville

From: [Todd O'Mealy](#)
To: [Mindy Brooks](#)
Subject: Packwood
Date: Friday, July 18, 2025 12:46:40 PM

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Mindy , I got your name from a friend of mine. She informed me about the push to stop or limit short term rentals in Packwood. I just want to say as a person who's family has been here since the 60s.I think it's a terrible mistake to do that. I watched what happened to this place when the lumber industry folded. Our only way to keep this place alive is through tourism. I know that over 60% of the people in this small town make so sort of living from tourists. Yes I have seen my taxes go crazy. And property values go off the charts. But I know if they limit this industry everything in our community will come crashing down. Thanks for your time.
Todd

From: [Nick Truckey](#)
To: [Mindy Brooks](#)
Subject: Written Testimony for July 22nd Meeting – STR Regulation Consideration for In-Progress Build in Timberline Neighborhood
Date: Friday, July 18, 2025 12:04:31 PM

Dear Planning Commission Members,

My name is Nick Truckey, and I am submitting this testimony as a property owner currently building a home in the Timberline neighborhood of Packwood, which falls within a LAMIRD zoning designation.

This cabin is more than a project. It is a labor of love that I am building with my father, who has been a general contractor for over 40 years. It is a multi-generational effort that involves my wife, our two daughters ages 3 and 1, and our extended family. I work full time as a Pierce County firefighter, and we are working on this cabin together during weekends and off-days. Our dream is to create a lasting family retreat that can be shared across generations.

We are not building this home as a commercial investment. The short-term rental component is simply a way to help make the project financially viable for our family. Every step of this project has been guided by the assumption that STRs would continue to be allowed in this area. From the site planning and septic system to the floor plan and financing, we have moved forward in good faith based on that understanding.

After reviewing the July 17 staff report on STR regulations, I want to express my appreciation for the thoroughness of the work and the clear effort to balance competing interests. I also want to voice my strong support for Chair Corbin's July 22 proposal, which offers a thoughtful and practical alternative to the proposed 25 percent cap. His recommendation to pursue a licensing system and support a community-led STR Association reflects a fair and logical path forward. It acknowledges the diversity of STR owners, many of whom are local families like mine, not large commercial operators.

If Chair Corbin's proposal is adopted, I believe it would allow families like mine to continue building in a responsible and community-minded way. However, if the 25 percent cap is implemented in LAMIRDs like Timberline, I respectfully ask the Commission to consider the following:

1. Include a clear pathway for homes currently under construction with documented STR intent such as permitted plans, septic sizing, and STR-focused design to qualify for STR permits regardless of when final occupancy is granted. I ask that the county maintain a list of in-progress builds like mine so that we may be considered under a legacy status. This would help ensure that families who have already committed resources and time are not unintentionally excluded from eligibility when permits are issued.
2. Allow STR permits to remain valid when ownership is transferred into a family trust or LLC for insurance, liability protection, or estate planning. These are standard structures for family property management and do not reflect a change in operational control. Owners should not lose eligibility simply for protecting their property legally and responsibly.

While I may be part of a small group, I hope the Commission considers the depth of

investment and long-term intent behind builds like mine. We are not speculators. We are working families putting everything into creating something lasting and meaningful. This cabin represents years of hard work and future memories for our entire family.

Thank you for your time, your service, and your consideration of residents like myself who are building with care, intent, and a long-term commitment to the Lewis County community.

Sincerely,
Nick Truckey
Timberline Resident
253-985-0593
truckeyfi@gmail.com

From: [Lara Wood](#)
To: [Mindy Brooks](#)
Subject: Commissioner Corbin
Date: Saturday, July 19, 2025 8:33:32 AM

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Dear Commissioner Corbin,

Thank you for your thoughtful recommendation to table the current short-term rental draft in favor of forming a steering committee of engaged constituents representing both STR owners and permanent local residents. We recognize this is a highly complex issue, especially in a county with such diverse needs and perspectives. We also appreciate that there is no simple solution, and that respectful, collaborative discussion and problem-solving offer the most promising path to a thoughtful resolution.

We are grateful for the time and investment you've made in this topic and enthusiastically support your proposal.

With gratitude,

Lara and Dan

267 Paradise Drive, Ashford

From: [John Steiger](#)
To: [Mindy Brooks](#)
Subject: Comment on STR regulations
Date: Sunday, July 20, 2025 11:03:43 AM

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Hi Mindy

I had a further comment I wanted to send to you and the county commissioners, but I can't seem to get past the counties various email filters. Would it be possible for you to forward it and add to the comments Thanks!

John

Dear Commissioners

I am writing to express my strong opposition to the county's draft short term rental (STR) regulations for Lewis County.

We have attended several public meetings in Packwood and listened to the myths often repeated by the small number of vocal opponents of STRs. While the county staff has done an admirable job in allowing different opinions to be heard, I feel that more work needs to be done to collect pertinent hard data prior to deciding whether STR regulations are even needed, much less what they should entail. I am especially concerned that the draft regulations are not data/research driven, and in fact reflect some of the oft repeated, but unsupported, myths about STRs.

The following are points in response to some of these STR myths (full disclosure – we STR our home in Packwood for part of the year)

- Myth: STRs are purchased by wealthy out of town investors with no ties or concern for the local community. In my experience, STRs in Packwood are typically owner occupied for a portion of the year. Many, if not the majority STR owners, are families with deep ties to the community who use their properties a portion of the year, but have found it necessary to STR their properties in the face of dramatic Lewis County property tax and insurance bill increases. Where folks own several units, these are often "small businesses" again owned and managed by local residents. County staff have presented a count of STRs in different areas, but they have not provided data on what proportion are "part time" STRs also used part time by the owners or small local businesses. This lack of basic data allows the myth of the "absentee owner" to continue to cloud the issue.
- Myth: STRs decrease the availability "affordable" rental housing. I have not seen data from the Packwood area that would support this myth. I can certainly confirm that we would never rent our property on a long term basis because that would make it impossible

for ourselves and our extended family to use our property. Finally, if we did rent our property long term, we would have to charge a rent far above an amount considered "affordable" just to pay the combined cost of mortgage, interest, insurance and Lewis County property tax. Again, county staff have not provided any data on the percentage of current STRs which would (or could with a reasonable ROI) be converted from STR to long term rental housing.

- Myth: STRs cause problems of trash, noise, etc. in the community. This myth is typically presented with no actual data to support it. We and our neighbors have had literally hundreds of guests. We have had literally zero issues or complaints from our neighbors. STR opponents often complain about "trash on trails," etc. and attribute it to STRs. How do they know the source of the alleged trash? None of us want to see our beautiful Packwood environment despoiled. But there are already laws against littering. Perhaps the county staff who drafted the proposed regulations could provide data from the sheriff's office on the percentage of arrests due to STR guest v. local residents? Short of hard data, this remains an unsubstantiated myth.
- Myth: STRs pose threat to the environment re human waste. This is a newly expressed "concern" that surfaced with the draft STR regulations, the argument being that even with county permitted septic systems, somehow STR use might "overwhelm" the permitted system as a result of large short term use by STR guests. I guess this is the myth that STR guests "flush more often" than homeowners and their visiting friends and family. I am not an engineer, but at least with our system, liquids are pumped out to the drain field. I'm pretty sure most functioning systems can handle liquid from multiple showers. If not, then perhaps the county should revisit its septic system regulations. But there is certainly no logical or data driven basis for greater concern with STRs impacting the environment than any other usage.
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seemingly more affordable. This is a reality throughout Washington, not just in Packwood, and therefore it seems a stretch to blame it on STRS. Certainly the lack of a sewer system downtown has limited options for cheaper housing. It is also certainly fair to point out STRs positive impact on both county taxes and local employment. Perhaps county staff could produce hard data on the impact on county taxes and local employment directly attributable to STRs? For example, does the county know how many people are employed in the STR business and how much tax revenue is generated by STRs? A small increase in "affordable housing" is not much of a help if it comes at the expense of local people losing jobs!

Thank you for the opportunity to comment.

John Steiger

From: [Rhonda Ashpole](#)
To: [Mindy Brooks](#)
Cc: [Steve Ashpole](#)
Subject: STR - written testimony from homeowner
Date: Monday, July 21, 2025 3:22:14 PM
Attachments: [IMG_4843.PNG](#)
[IMG_4842.PNG](#)
[IMG_4841.PNG](#)

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Dear Mindy and the Lewis County Board -

We are writing to express shared concerns with our fellow STR owners in the Packwood area regarding possible STR land use regulations. We participated via Zoom on July 8 and really were encouraged to hear so many of our same concerns expressed, as well as to feel that we share a very similar story with other owners.

We have had our Goat Rocks property in our family for 30 years. My dad, a custom home builder, built it from the ground up. He drove up nearly every weekend for two years with his van full of building materials. Our first family overnight there was in December of 1995.

As my parents aged, taking care of the cabin became more difficult for them. My dad kept driving up (which became less safe over time) to his beloved property but about 8 years ago it had become too much. He considered selling because it was stressful for him worrying about the upkeep and maintenance. We asked him if he wanted to sell it!?? He had been making more impulsive decisions due to aging, anxiety and Parkinsons and we really didn't think that was his desire long-term.

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Long story short, the property and care of it was passed to us in 2017. Due to our financial situation (and two college aged kids to support) we had to see how a venture with Airbnb would go in order to help us maintain it and keep it in the family, honoring our parent's wishes.

Utilizing the property as a STR has allowed us to invest back into our property 10's of thousands of dollars in upkeep and upgrades the past 7 years. We pay our taxes and insurance, upkeep and that's about it off our rental income. We do NOT want it rented out more than about 30% of the year as the priority remains for it to be our "family legacy property" and generate enough income to pay for it.

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We hope that Lewis County will consider all of our concerns and also know that the vast majority of us are not making much money and are not in it for those reasons. Any regulations

set forth we hope will be WELL researched and justified, and that there will be sound logic behind any new regulation or guidelines. Thank you for your time in looking over our testimony.

Kindly,
Steve and Rhonda Ashpole
Goat Rocks
126 Lake Creek Drive
Packwood, Washington



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

July 21st, 2025

Mindy Brooks
Lewis County Community Development
2025 NE Kresky Ave
Chehalis, WA 98532

Re: WDFW Comments on Proposed Lewis County Development Regulations

Dear Mindy,

Thank you for the opportunity to provide input on the proposed updates to Lewis County's development regulations. The Washington Department of Fish and Wildlife (WDFW) has reviewed the following chapters and offers comments to help ensure that critical areas, particularly Fish and Wildlife Habitat Conservation Areas (FWHCAs), are effectively protected in accordance with state law and best available science (BAS).

Our main points and recommendations are highlighted in bold throughout the letter for clarity. In addition to general policy guidance, we have provided suggested language for code additions and edits, including specific locations within the Lewis County Code where these recommendations could be incorporated to improve consistency with the Growth Management Act (GMA), Revised Code of Washington (RCW) 36.70A, and relevant Washington Administrative Code (WAC) provisions. These recommendations are provided for your consideration and are intended to support the County's planning efforts. Ultimately, Lewis County retains full discretion over how to incorporate or address these suggestions as part of the local decision-making process.

Chapter 16 Subdivisions

While we understand and support the intent to promote more efficient land use, our primary concern is regarding the subdivision of parcels that contain critical areas. The proposed increase in densities could result in subdivisions where newly created lots are heavily encumbered by critical areas, leaving little viable space for development. In these cases, reasonable use provisions may become the only viable option, leading to significant encroachment into these sensitive areas. This could have severe long-term impacts on the environment, including the loss of habitat, and increased vulnerability to natural hazards. To mitigate negative impacts from subdividing properties containing or adjacent to critical areas, WDFW recommends requiring a comprehensive environmental assessment for any parcel with mapped critical areas. This assessment should document the location and extent of these areas and evaluate how the proposed subdivision may affect them.

Recommended Code Addition: "For any subdivision proposal involving parcels containing or adjacent to critical areas as defined in the Lewis County Critical Areas Ordinance (Chapter 17.35), the applicant shall submit a comprehensive environmental assessment identifying critical areas and evaluating potential impacts."

Chapter 17.15 UGA Cities and Chapter 17.17 UGA Small Towns

WAC 365-196-310(4)(c)(iv) requires discouraging Urban Growth Area (UGA) expansions into critical areas unless it can be demonstrated that: "(A) The new development can be safely accommodated without impacting critical area functions and values; and (B) The infrastructure is provided in a manner that protects the environment." However, the current ordinances do not address this nor include criteria for protecting critical areas during UGA boundary modifications.

Recommendation: Add language requiring UGA expansions to be reviewed for consistency with WAC 365-196-310(4)(c)(iv) and RCW 36.70A.110(2), discouraging expansions into mapped critical areas.

WAC 365-196-335 requires counties to identify and designate open space corridors to support wildlife habitat connectivity and recreation, complemented by WAC 365-190-130 emphasizing habitat conservation for long-term ecological viability. The ordinance currently lacks mechanisms to map or protect these corridors when applying city zoning or approving developments within UGAs.

Recommendation: Incorporate provisions requiring identification, mapping, and protection of open space corridors and habitat linkages in coordination with WDFW's Priority Habitats and Species (PHS) and Washington Habitat Connectivity Action Plan (WAHCAP) data as part of UGA planning and development review.

Chapter 17.20E Master Planned Resort (MPR)

We would like to acknowledge and build upon our previous comment letter submitted on May 23, 2025, which outlined key environmental considerations for MPR designations within the county. We recognize that the MPR overlay provides an important foundation for environmental protection, particularly through Lewis County Code 17.20E.020(4), which mandates compliance with critical area regulations, and LCC 17.20E.050(1)(d), which requires environmental remediation if a project is abandoned. However, the current MPR ordinance allows water bodies to count toward the required 40% open space designation. While lakes, wetlands, and rivers offer ecological value, including them in the open space calculation can diminish the intent of preserving functional upland habitat and recreational space.

In alignment with WAC 365-190-130, which highlights the importance of meaningful habitat protection in land use planning, we recommend that open water areas be excluded from the 40% open space requirement. Instead, the open space requirement should apply only to upland and terrestrial land cover to better support habitat structure, species movement, and passive recreation.

Recommended Code Addition (to LCC 17.20E.030 – Development Standards): "For the purposes of meeting the 40% open space requirement, only upland and terrestrial areas shall be counted. Open water features, including lakes, reservoirs, or ponds, may be preserved as environmental assets but shall not contribute to the minimum open space calculation."

Given the ecological sensitivity of the proposed MPR sites, including the former TransAlta mine and the Thompson Road area, WDFW recommends that the County explicitly require identification and protection of open space corridors to avoid habitat fragmentation. This is supported by WAC 365-196-335, which directs counties to protect open space connections between critical areas and habitats. These corridors help maintain species movement and resilience and are especially vital for species listed as sensitive, threatened, or endangered by WDFW.

Recommended Code Addition (to LCC 17.20E.030 – Development Standards or 17.20E.040): "All Master Planned Resort proposals shall identify and preserve open space corridors that maintain or enhance habitat connectivity between critical areas. Such corridors shall be mapped during site planning and incorporated into long-term conservation areas through easements, buffers, or other permanent mechanisms."

By implementing these targeted updates, clarifying open space standards, requiring robust environmental review, and preserving habitat connectivity, Lewis County can advance the intent of the Growth Management Act to ensure no net loss of ecological function in its most sensitive landscapes. WDFW stands ready to provide technical assistance, mapping tools, and species data to help the County implement these improvements and ensure the long-term success of the Master Planned Resort framework.

Chapter 17.127 Energy Facilities

The current language broadly addresses minimizing impacts on natural resources but does not explicitly require compliance with the Lewis County Critical Areas Ordinance (CAO). Per RCW 36.70A.060 and RCW 36.70A.172, counties must protect critical areas such as wetlands, fish and wildlife habitat conservation areas, and aquifer recharge zones through locally adopted regulations. We recommend incorporating a clear requirement that all energy facility proposals comply with the CAO to ensure consistent protections of critical areas.

Recommended Code Addition: “All energy facility proposals shall comply with the applicable requirements of the Lewis County Critical Areas Ordinance (LCC Chapter 17.35)”

The ordinance should require early and ongoing coordination with state agencies throughout planning, review, and permitting processes for energy facilities, especially where critical areas are present. WDFW is available to provide technical assistance and guidance for project locations containing PHS.

Recommended Code Addition: “Where energy facility proposals occur within or adjacent to mapped critical areas, applicants shall coordinate with the appropriate state agency during pre-application, permitting, and environmental review processes to ensure no net loss per RCW 36.70A.060 and WAC 365-190-130.”

Chapter 17.142.210 Surface Mining

We urge the County to explicitly require that all surface mining proposals comply fully with the Lewis County Critical Areas Ordinance. Surface mining operations inherently disturb the land and can impact wetlands, riparian areas, and other critical habitats that provide important ecological functions. Compliance with the CAO is essential to avoid net loss of priority habitats and maintain ecosystem function consistent with RCW 36.70A.060 and RCW 36.70A.172.

Recommended Code Addition: “All surface mining operations, regardless of location, shall comply with the applicable requirements of the Lewis County Critical Areas Ordinance.”

The ordinance should clearly require that applicants identify and map critical areas on proposed mining sites, including wetlands, streams, and PHS as defined by WDFW. WDFW welcomes opportunities to provide technical review and assistance on Environmental Impact Statements (EIS) or mitigation plans associated with surface mining projects to ensure that fish and wildlife habitat impacts are properly identified and addressed.

Recommended Code Addition: “Surface mining special use permit applications must include detailed mapping of existing site features and critical areas, and the County may request consultation with WDFW for evaluation of Priority Habitats and Species.”

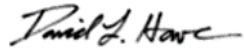
WDFW appreciates the opportunity to collaborate with Lewis County in strengthening the protections for critical areas and supporting sustainable growth. We encourage the County to carefully consider these recommendations to enhance the conservation of critical areas. WDFW remains available to provide technical assistance, data, and guidance as needed throughout the ongoing planning and implementation process.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Brittney Salter".

Brittney Salter
WDFW Southwest Washington Land Use Planning Lead

Reviewed and approved by:

A handwritten signature in black ink, appearing to read "David L. Howe".

Dave Howe, WDFW Region 5 Habitat Program Manager
Jessica McConnell, WDFW Region 5 Assistant Habitat Program Manager

Written Testimony for July 22 Planning Commission Meeting

To: Lewis County Planning Commission

Submitted by: Michael John Beaupain

Property: 250 Snyder Rd, Packwood, WA 98361

Phone: 301-767-7823

Email: mickbeau1@hotmail.com

Dear Planning Commission Members,

Thank you for your time and service to the residents and property owners of Lewis County.

My name is Michael John Beaupain. I am a member of the U.S. Foreign Service and I own a single property at 250 Snyder Road in Packwood. Although I am currently stationed in Washington, D.C., where I rent a home, this property is my only residence and my long-term investment in Lewis County.

I use this home as a short-term rental, not as a business empire, but as a way to help offset my rent and keep the house from sitting vacant. I am not trying to turn a major profit—only to maintain the property and pay for its upkeep.

However, in recent years, I've found myself facing ever-rising property taxes and increasingly complex county requirements that are both financially and logistically burdensome. These processes—while perhaps designed to target large STR operators—end up hurting small, responsible owners like me. Larger operators can afford legal and accounting help. I cannot. I am simply trying to keep up, and it is becoming more and more difficult.

I do not object to paying taxes. I support reasonable, transparent processes that ensure everyone contributes their fair share. But I am asking the County to take into account the unintended consequences of over-complication and disproportionate burden on individual homeowners who are trying to do the right thing.

Please continue to prioritize simplicity, fairness, and clarity in your policies—and recognize that many STR owners are not large companies, but working professionals like myself, doing our best to be good stewards of our homes and our community.

Thank you for your consideration.

Sincerely,

Michael John Beaupain

From: [Denette Neville](#)
To: [Mindy Brooks](#)
Subject: STR Regulations
Date: Friday, July 18, 2025 10:53:01 AM

You don't often get email from denetteneville@gmail.com. [Learn why this is important](#)

Dear Commissioner Corbin,

Thank you for suggesting to hold off on the current draft of short-term rental regulations and instead create a steering committee that includes both STR owners and local residents.

I think this is an equitable and fair approach. It gives everyone a chance to be heard and involved in shaping policies that affect our communities. Taking time for open discussion and collaboration will lead to better, more balanced outcomes for everyone—those who rely on STRs and those concerned about their impacts.

I fully support your proposal and hope the Planning Commission sees the value in it too.

Thanks again for your thoughtful direction.

Denette Neville

From: [Nickolas Neville](#)
To: [Mindy Brooks](#)
Cc: [Scott Brummer](#)
Subject: Thank You Commissioner Corbin for Your Proposed Amendment on STR Regulations
Date: Friday, July 18, 2025 9:07:52 AM

Hello Mindy,

Could you please make this part of the written record for 7/22 meeting?

Dear Commissioner Corbin,

I want to extend my sincere thanks for your thoughtful proposal to table the current draft of short-term rental regulations and form a steering committee comprised of both STR owners and local residents.

This approach provides a valuable opportunity for meaningful dialogue and collaborative problem-solving. A stakeholder-driven process has the potential to produce well-balanced policies that reflect the diverse needs of our community—recognizing both the economic benefits that short-term rentals bring to Lewis County and the importance of minimizing any negative impacts.

I fully support this proposal and hope to see it adopted by the Planning Commission. It represents a proactive and inclusive path forward, and I believe it positions Lewis County to be a leader in this space.

Thank you again for your leadership.

Sincerely,

Nick Neville

From: [Todd O'Mealy](#)
To: [Mindy Brooks](#)
Subject: Packwood
Date: Friday, July 18, 2025 12:46:40 PM

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Mindy , I got your name from a friend of mine. She informed me about the push to stop or limit short term rentals in Packwood. I just want to say as a person who's family has been here since the 60s.I think it's a terrible mistake to do that. I watched what happened to this place when the lumber industry folded. Our only way to keep this place alive is through tourism. I know that over 60% of the people in this small town make so sort of living from tourists. Yes I have seen my taxes go crazy. And property values go off the charts. But I know if they limit this industry everything in our community will come crashing down. Thanks for your time.
Todd

From: [Nick Truckey](#)
To: [Mindy Brooks](#)
Subject: Written Testimony for July 22nd Meeting – STR Regulation Consideration for In-Progress Build in Timberline Neighborhood
Date: Friday, July 18, 2025 12:04:31 PM

Dear Planning Commission Members,

My name is Nick Truckey, and I am submitting this testimony as a property owner currently building a home in the Timberline neighborhood of Packwood, which falls within a LAMIRD zoning designation.

This cabin is more than a project. It is a labor of love that I am building with my father, who has been a general contractor for over 40 years. It is a multi-generational effort that involves my wife, our two daughters ages 3 and 1, and our extended family. I work full time as a Pierce County firefighter, and we are working on this cabin together during weekends and off-days. Our dream is to create a lasting family retreat that can be shared across generations.

We are not building this home as a commercial investment. The short-term rental component is simply a way to help make the project financially viable for our family. Every step of this project has been guided by the assumption that STRs would continue to be allowed in this area. From the site planning and septic system to the floor plan and financing, we have moved forward in good faith based on that understanding.

After reviewing the July 17 staff report on STR regulations, I want to express my appreciation for the thoroughness of the work and the clear effort to balance competing interests. I also want to voice my strong support for Chair Corbin's July 22 proposal, which offers a thoughtful and practical alternative to the proposed 25 percent cap. His recommendation to pursue a licensing system and support a community-led STR Association reflects a fair and logical path forward. It acknowledges the diversity of STR owners, many of whom are local families like mine, not large commercial operators.

If Chair Corbin's proposal is adopted, I believe it would allow families like mine to continue building in a responsible and community-minded way. However, if the 25 percent cap is implemented in LAMIRDs like Timberline, I respectfully ask the Commission to consider the following:

1. Include a clear pathway for homes currently under construction with documented STR intent such as permitted plans, septic sizing, and STR-focused design to qualify for STR permits regardless of when final occupancy is granted. I ask that the county maintain a list of in-progress builds like mine so that we may be considered under a legacy status. This would help ensure that families who have already committed resources and time are not unintentionally excluded from eligibility when permits are issued.
2. Allow STR permits to remain valid when ownership is transferred into a family trust or LLC for insurance, liability protection, or estate planning. These are standard structures for family property management and do not reflect a change in operational control. Owners should not lose eligibility simply for protecting their property legally and responsibly.

While I may be part of a small group, I hope the Commission considers the depth of

investment and long-term intent behind builds like mine. We are not speculators. We are working families putting everything into creating something lasting and meaningful. This cabin represents years of hard work and future memories for our entire family.

Thank you for your time, your service, and your consideration of residents like myself who are building with care, intent, and a long-term commitment to the Lewis County community.

Sincerely,
Nick Truckey
Timberline Resident
253-985-0593
truckeyfi@gmail.com

From: [Lara Wood](#)
To: [Mindy Brooks](#)
Subject: Commissioner Corbin
Date: Saturday, July 19, 2025 8:33:32 AM

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Dear Commissioner Corbin,

Thank you for your thoughtful recommendation to table the current short-term rental draft in favor of forming a steering committee of engaged constituents representing both STR owners and permanent local residents. We recognize this is a highly complex issue, especially in a county with such diverse needs and perspectives. We also appreciate that there is no simple solution, and that respectful, collaborative discussion and problem-solving offer the most promising path to a thoughtful resolution.

We are grateful for the time and investment you've made in this topic and enthusiastically support your proposal.

With gratitude,

Lara and Dan

267 Paradise Drive, Ashford

From: [John Steiger](#)
To: [Mindy Brooks](#)
Subject: Comment on STR regulations
Date: Sunday, July 20, 2025 11:03:43 AM

You don't often get email from j.steiger49@gmail.com. [Learn why this is important](#)

Hi Mindy

I had a further comment I wanted to send to you and the county commissioners, but I can't seem to get past the counties various email filters. Would it be possible for you to forward it and add to the comments Thanks!

John

Dear Commissioners

I am writing to express my strong opposition to the county's draft short term rental (STR) regulations for Lewis County.

We have attended several public meetings in Packwood and listened to the myths often repeated by the small number of vocal opponents of STRs. While the county staff has done an admirable job in allowing different opinions to be heard, I feel that more work needs to be done to collect pertinent hard data prior to deciding whether STR regulations are even needed, much less what they should entail. I am especially concerned that the draft regulations are not data/research driven, and in fact reflect some of the oft repeated, but unsupported, myths about STRs.

The following are points in response to some of these STR myths (full disclosure – we STR our home in Packwood for part of the year)

- Myth: STRs are purchased by wealthy out of town investors with no ties or concern for the local community. In my experience, STRs in Packwood are typically owner occupied for a portion of the year. Many, if not the majority STR owners, are families with deep ties to the community who use their properties a portion of the year, but have found it necessary to STR their properties in the face of dramatic Lewis County property tax and insurance bill increases. Where folks own several units, these are often "small businesses" again owned and managed by local residents. County staff have presented a count of STRs in different areas, but they have not provided data on what proportion are "part time" STRs also used part time by the owners or small local businesses. This lack of basic data allows the myth of the "absentee owner" to continue to cloud the issue.
- Myth: STRs decrease the availability "affordable" rental housing. I have not seen data from the Packwood area that would support this myth. I can certainly confirm that we would never rent our property on a long term basis because that would make it impossible

for ourselves and our extended family to use our property. Finally, if we did rent our property long term, we would have to charge a rent far above an amount considered "affordable" just to pay the combined cost of mortgage, interest, insurance and Lewis County property tax. Again, county staff have not provided any data on the percentage of current STRs which would (or could with a reasonable ROI) be converted from STR to long term rental housing.

- Myth: STRs cause problems of trash, noise, etc. in the community. This myth is typically presented with no actual data to support it. We and our neighbors have had literally hundreds of guests. We have had literally zero issues or complaints from our neighbors. STR opponents often complain about "trash on trails," etc. and attribute it to STRs. How do they know the source of the alleged trash? None of us want to see our beautiful Packwood environment despoiled. But there are already laws against littering. Perhaps the county staff who drafted the proposed regulations could provide data from the sheriff's office on the percentage of arrests due to STR guest v. local residents? Short of hard data, this remains an unsubstantiated myth.
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Thank you for the opportunity to comment.

John Steiger

From: [Rhonda Ashpole](#)
To: [Mindy Brooks](#)
Cc: [Steve Ashpole](#)
Subject: STR - written testimony from homeowner
Date: Monday, July 21, 2025 3:22:14 PM
Attachments: [IMG_4843.PNG](#)
[IMG_4842.PNG](#)
[IMG_4841.PNG](#)

You don't often get email from rhondarayash@gmail.com. [Learn why this is important](#)

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set forth we hope will be WELL researched and justified, and that there will be sound logic behind any new regulation or guidelines. Thank you for your time in looking over our testimony.

Kindly,
Steve and Rhonda Ashpole
Goat Rocks
126 Lake Creek Drive
Packwood, Washington

July 21, 2025

Thank you for this opportunity to share my thoughts.

I am a longtime, voting, full time resident of Packwood. I have witnessed and been a part of the changing landscape here for the past 47 years. I worked for the Forest Service, White Pass Ski area, local restaurants, the local Doctor's office and have been a sole proprietor of my own massage therapy practice for 30 years now. My children went to school here and graduated from White Pass School High School.

Yes, things changed when the mill closed. But we were not a dying community. Yes, Packwood has always served as a destination vacation area, but there was a balance between local residents and visitors. That balance no longer exists. I would guess that the population doubles on any given summer weekend and many of them are disrespectful in a multitude of ways. And yet the same infrastructure that is here to serve the full time residents is all there is for handling the increase. It is overtaxed by too many people. Yes, sewer will change much of that strain, but how far out is that? Years!

I strongly support a CAP of 25% as proposed, NOW! And then reassess later. I believe it is overdue! And every single one of the other long time residents that I speak with, but who have not made their own voices heard, agree!

It has been a painful transition to surrender to what feels like a "take over" of our small peaceful living environment to a busy, noisy, congested one, in which there is so much more garbage floating around, long lines, neighborhoods disrupted, feeding the elk/wildlife creating a nuisance and a danger; not respecting burn bans which creates a potential hazard. The tourist spots are at capacity most weekends including the ski area in the winter and Mt Rainier the rest of the year. Camping areas and trail head parking lots are full, and TP and dog poop litters the trails. Emergency services are overtaxed; It is hard to get across the highway in downtown.

Over the past 5 years, my neighborhood has slowly been becoming a vacation playground. The nostalgic sentiment that was expressed about kids riding bikes in the streets is very different from what it was when my kids were growing up here in this same downtown area where I now live. There is more dangerous traffic at any given time of day. Although, for the most part people are quiet after 10 pm, this is not always the case.

I agree that garbage cans should not be left out on the street, by anyone, STR or fulltime residents, but requiring them to be all the way inside a building might be a little too much. As long as the cans are secure and someone local is responsible and present for any mess that might occur due to animals. I have picked up garbage in my neighborhood numerous times when new owners are still figuring out that they aren't in the city anymore!

I also support all the proposed regulations addressing health and safety requirements. I believe it is absolutely appropriate to have occupancy limits based on bedrooms and septic size. Cramming in as many people as possible is just an invitation for bad neighbor behavior, not to mention septic drainage. It would be ideal if STR owners formed relationships with full time resident neighbors as a kind of neighborhood watch to keep everyone safe and happy.

I support the proposed permit process and them being non transferrable.

I love Chairman Corbin's idea about the formation of an STRA so that there could be a collaborative effort. (And by the way, there were STR owner's represented on the Community Advisory Committee, but I think you already know that)

I think the CAP should be put in place NOW! along with the other commonsense regulations with an allowance for revisiting the issue in the future...not the other way around. These regulations are already long overdue.

The testimonies at the last hearing were indeed heartfelt and informative . I especially appreciated the level headed ones that made helpful suggestions. AND so many of the 3 hours of testimony were based on a false narrative that they would be losing what they already have. It was made clear in Mindy's presentation and in the written proposal that this was not the case. But the misunderstanding made for good support of their storyline.

I agree, that most STR owners operate a business that is safe and respectful and that violators should be held accountable. Having a contact number visibly available , or a number to call for all STRs collectively, is a step in the right direction for ending the few that are disruptive. Having more available local law enforcement would also be helpful. Agreed. It is not just visitors who cause disturbance, but local folks also, unfortunately.

The issue of affordable housing is complex as many recognize. I strongly believe that even though I cannot site a study providing factual evidence, as a long term renter in the community, my experiential knowledge, and common sense point to the fact that the STR market does indeed effect the overall housing market including availability for long term renters and even moderate income earners who would like to settle here and buy. I personally know too many quality community members who have left due to available and affordable housing issues. It's the people , not the money that makes a community strong and viable. Many of the quality people here now first began as seasonal workers. The opportunity for staying longterm seems hopeless as the housing market is now. Unless we put a cap on it now, rather than wait a couple years, in the meantime, people will be scrambling to increase the number of STRs exponentially. We must stop it now!

I have witnessed over my years here that this end of the county has been operating “ under the radar” in many ways, some good, some not. I assume that it is hard for some STR owners to swallow the fact that those days are over. Just as our days of clean, quiet living for full time residents has ended, so too , the taking advantage and exploitation of our resources is over for those coming in and seeing opportunity for such. STR's are a business/commercial enterprise and should be recognized as such!

One thing I think both STR owners and fulltime residents can agree upon is that we don't want corporate ownership to come in take over. There should be a limit as to how many STR's can be owned by one person or entity. And County beware that the corporate world will be sneaky about it!

Another point I'd like to make is that Money is not the only measure of community health. Let's not be greedy about growth. The people that own STR's and think they are doing us all a favor by stimulating the economy, don't send their children to school here, or vote on community issues, People didn't stay here when the mill closed because they wanted to make big money. What draws people here to begin with, is being eroded by overcrowding, desires for big city conveniences, and an infrastructure that isn't adequately keeping up. It seems that putting a CAP would be an advantage to the current STR owners so that the market isn't more diluted. I observe that every STR is not occupied every night or even every weekend.

And 6 months to get your permit seems adequate time with an allowance for special circumstances to be considered.

Please, lets pause the number of new STRs before more irreparable damage is done. That is the most responsible action the county can take at this time.

The time is NOW!

Thank you,
Cathy Lilienthal
P.O. Box 174
109 Rainier Ave S
Packwood, WA 98361

From: [Joe Loeffler](#)
To: [Mindy Brooks](#)
Subject: Written Testimony
Date: Monday, July 21, 2025 11:47:09 AM

To the Members of the Lewis County Planning Commission,

Thank you for your time, attention, and thoughtfulness throughout this process.

I am writing today to express my strong support for the amendment to the proposed short-term rental (STR) regulations introduced by the Chair. This amendment strikes a sensible and balanced path forward—it pauses sweeping new regulations while creating space for stakeholders to organize and collaborate on common-sense solutions.

We stand ready to engage in the process described in the amendment and are prepared to show that self-governance is not only possible, but effective. We hope this amendment marks the beginning of a productive and collaborative chapter in this conversation.

Please vote in support of the amendment and continue working with us to shape a regulatory framework that reflects the opportunities and future of Lewis County.

Respectfully,
Joe Loeffler
(206) 295-1567

Written Testimony for July 22 Planning Commission Meeting

To: Lewis County Planning Commission

Name: Briston Meidinger

Property: 408a Craig road, Packwood WA 98361

Phone: 360-789-1225

Email: Office@tmcvacationrentals.com / Briston@pacifictrailrealty.com

Dear Planning Commission Members,

My family owns and operates TMC Vacation Rentals in Packwood. We currently manage 62 properties in the Packwood area. My wife and I moved to Packwood in 2015 when I exited the military after 6 years of Active-duty service with the USAF. We still live here full time with our 2 kids and run TMC Vacation Rentals. I also own Pacific Trail Realty and have had an active real estate license since 2015. My wife and I are also currently board members of “Packwood Learning Community” which is a local 501(c)(3) non-profit for preschool age kids in our area. I also have a few years’ experience with managing long-term rentals here in East Lewis County. But that is not my primary focus these days.

I ask that you consider not supporting the proposed STR regulations by county staff. We have had affordable housing meetings since 2018 or so; And years of discussion about the sub area plan. But this recent proposal for county-wide restrictions seemingly came out of nowhere for a lot of people. I do not believe they would be in the best interest of our community.

I also think our STR community needs to do a better job of getting organized to address issues that full-time residents have with visiting guests. Speeding, noise, trespassing, etc. From my experience, it is pretty rare that we have those types of issues with our guests and neighbors. But issues do happen from time to time and are addressed quickly and effectively. I realize that an out-of-town host may not be able to remedy issues as fast. The formation of a group is now underway and one of its goals is to address some of these good neighbor type issues that have been mentioned.

There is a whole lot to discuss with the topic of STRs, long term rentals, our local economy, etc. So, if you have any questions or are just curious about maybe something specific that I may have knowledge of; feel free to reach out any time. We will probably have close to 3000 reservations in 2025 at TMC. Over the last 10 years we have had a lot of guest experiences, interactions, and general knowledge on subjects that we can share.

Thank you for your time,

Briston Meidinger

Manager, TMC Vacation Rentals

Designated Broker/Owner, Pacific Trail Realty

Public Comment Regarding Proposed STR Regulations – Lewis County Planning Committee

Dear Planning Committee Members,

As a responsible short-term rental (STR) property owner in Packwood, I appreciate the opportunity to provide public comment regarding the proposed regulations on STRs in Lewis County.

I urge the committee not to impose limits on the number of STRs in the county and to refrain from adding new regulations to those already in place. These changes could have unintended and far-reaching negative impacts on the local economy, private property rights, and community vitality.

1. STRs Support the Local Economy and Tourism

Packwood and Ashford are uniquely positioned as gateways to Mount Rainier National Park and the Gifford Pinchot National Forest. STRs are a vital piece of the tourism infrastructure. Unlike hotels or motels—which are few and often fully booked—STRs provide much-needed lodging capacity for families, hikers, skiers, and park visitors.

- Tourists spend money at local businesses, including restaurants, grocery stores, outfitters, gas stations, and more.
- STRs create jobs for housekeepers, handymen, landscapers, and property managers—many of whom live locally.
- Limiting STRs discourages investment, slows business growth, and reduces tax revenue generated through lodging and sales taxes.

If STR availability is artificially limited, tourists will simply book in neighboring counties like Pierce or Yakima, taking their tourism dollars elsewhere. This would be a major loss for local business owners and workers in Lewis County.

2. Limiting STRs Will Not Improve Housing Affordability

The argument that capping STRs will lead to more affordable housing is not supported by market realities. Housing prices are driven by many factors—construction costs, land availability, interest rates, and migration trends.

- Limiting STRs won't reduce home prices. Even if all STRs disappeared tomorrow, prices would continue to rise due to demand outpacing supply.
- STRs are self-regulating: if market saturation causes lower profits, or if owners can't find reliable cleaners or staff, they will voluntarily leave the STR market.

- Property owners won't convert to long-term rentals unless it's financially viable—and many rural homes are not suited for traditional rentals.
- If STR revenue drops below expectations, owners will sell, sit empty, or use homes as personal vacation properties, none of which guarantees affordable housing for working families.

3. STRs Improve Neighborhood Appearance and Maintenance

Contrary to the notion that STRs degrade neighborhoods, they often raise the standard of property care.

- STR owners are highly incentivized to maintain their homes, keeping them clean, attractive, and well-landscaped to appeal to guests and avoid complaints.
- STRs often renovate and repurpose formerly dilapidated or vacant homes, improving overall neighborhood appeal.
- By contrast, many long-term rentals and even owner-occupied homes in the area show signs of neglect—inoperable vehicles, overgrown yards, and trash accumulation.

Adding stricter regulation to STRs while ignoring the state of other properties sends the wrong message and punishes those who are actively investing in the community.

4. Property Rights and Regulatory Fairness

STR owners have invested significant time and money into their properties under the current zoning and regulatory framework. Retroactive policy changes erode property rights and community trust.

If new regulations are adopted, they must be applied evenly to all residential properties, including:

- Long-term rentals, which can cause the same or greater neighborhood disruptions.
- Owner-occupied homes, which are often exempt from rules that STRs must follow despite having similar impacts.

Fair governance requires a level playing field—not singling out STRs for targeted restrictions and compliance burdens.

5. STRs Fill a Flexible Housing Need

STRs support more than just tourism. They provide temporary housing for traveling professionals, seasonal workers, displaced families, and emergency responders. These guests rely on flexible, furnished accommodations in places where hotels are not a viable option.

Overregulating STRs would remove this essential layer of the housing market and reduce community resilience during times of crisis or seasonal demand.

In Closing

I respectfully request that the Lewis County Planning Committee:

- Reject any proposal to limit the number of STRs;
- Avoid adding unnecessary and burdensome regulations;
- And if regulations are revised, ensure they apply fairly across all residential property types, not just STRs.

Let's support a balanced approach that preserves neighborhood character, respects property rights, promotes economic vitality, and recognizes the real-world dynamics of the local housing and tourism markets.

Thank you for your service and consideration.

Sincerely,

James Peterson
Packwood Property Owner
253-820-5950

Primebuildnw@gmail.com

From: [Travis Redfield](#)
To: [Mindy Brooks](#)
Subject: Additional Comment on Short-Term Rental Regulations in Packwood
Date: Monday, July 21, 2025 3:44:48 PM

After attending the recent oral testimony regarding the proposed short-term rental (STR) regulations, I wanted to submit additional comments for your consideration.

At the end of the hearing, it was stated that the STR regulations are *not* aimed at addressing housing issues. This left me confused, as that had seemed to be one of the primary justifications leading up to this point. Wanting to better understand the rationale, I went back and reviewed several County Council meetings and workshop recordings on YouTube. What I consistently heard in those recordings were two primary concerns: (1) complaints about STRs being party houses or nuisances, and (2) a general negative sentiment toward STRs and visitors in Packwood.

Regarding the first point: In my neighborhood—and broadly around Packwood—I have not witnessed STRs causing problems. The STRs I’ve seen are clean, well-maintained, have proper parking, and are generally quiet. I often see families enjoying a peaceful stay, and appreciating the beauty of the area.

By contrast, some of the longer-term residences in our neighborhood are in poor condition—vehicles parked in yards, visible trash, and ongoing personal conflicts between neighbors that require authorities. I have seen consistent issues with these properties that go completely unregulated.

On the second point: I understand that, especially in the period after COVID, there was discomfort about Packwood changing and “outsiders” coming in. I’ll admit, I was uncertain at first too. But over time, I’ve come to appreciate the positive aspects of STRs. I’ve met owners who genuinely care about Packwood, and I’ve seen visitors bringing life and joy back into the area. It’s heartening to see people making memories here—families, couples, and outdoor enthusiasts alike.

I know the Commission is trying to balance many concerns, but I hope the final regulations reflect the diversity of actual lived experiences. Many STRs operate responsibly and make positive contributions to our community. I appreciate the opportunity to share mine.

Thank You

Travis Redfield

138 Tahoma St East

Packwood WA

July 20, 2025

1

To:

Lewis County Commissioners and Planning Commission
Lewis County Community Development Department
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Commissioners and Planning Staff,

As a teacher, a military wife, and a mother of five, I have dedicated my life to serving others, building community, and creating a stable future for my family. Our short-term rental in Packwood isn't just an investment—it's our lifeline. It helps us afford rising costs, support our children's needs, and contribute to a town we've come to love and care about deeply. I'm not a corporation or an absentee landlord—I'm a semi-local mom doing what I can to make ends meet. This memorandum is both a legal and personal response to the proposed short-term rental restrictions in Packwood, which I believe will do more harm than good to families like mine, to responsible property owners, and to the economic future of our community. I ask that you consider both the legal framework and the lived realities behind these regulations.

Sincerely,

Alison Weiss
Home Owner
112 Fairway Drive
Packwood, WA 9836

1
alisonweiss253@gmail.com
(253) 732-3834

I. INTRODUCTION

Short-term rentals have become a vital economic and cultural component of rural communities, especially in tourist-reliant towns like Packwood. Recent proposals seek to heavily restrict the operation of STRs through zoning limitations, occupancy rules, and categorical bans on certain types of dwellings. These restrictions, however, rest on assumptions unsupported by robust data, conflict with constitutional and statutory property rights, and risk economic harm to homeowners and the broader community.

II. REBUTTAL TO CLAIMED NEGATIVE IMPACTS OF STRs

A. Claim: STRs drive up property values

Rebuttal: This claim misinterprets the role of STRs in housing markets. While STRs may impact housing demand slightly, they are not a primary driver of rising property values in rural areas. Housing prices are influenced primarily by macroeconomic trends, such as post-pandemic migration patterns, inflation, and interest rates.

Case Law: In *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365 (1926), the Supreme Court held that zoning must be justified by a clear public interest. Mere speculation about property values is not sufficient. Courts continue to scrutinize zoning ordinances that unfairly burden specific property uses without substantial evidence (see *City of Ladue v. Gilleo*, 512 U.S. 43 (1994)).

Example: A 2020 study by the Urban Institute found that while STRs may have marginal effects on housing prices in large cities, the impact in rural towns is statistically insignificant and often offset by the benefits of increased tourism dollars.

B. Claim: STRs reduce affordable housing by converting long-term rentals

Rebuttal: Affordable housing shortages are a result of underbuilding, not STRs. In fact, many STRs are owner-occupied secondary homes, vacation homes, or cabins that were never available for long-term rental. Limiting STRs will not suddenly turn vacation homes into long-term rentals; instead, they may sit vacant, generating no local economic activity or tax revenue.

Example: In Lake Chelan, WA, strict STR limits were followed by a decrease in tourism-related tax revenue and no measurable increase in available long-term rentals. This suggests that STR units are not easily convertible.

Legal Perspective: In *Rental Housing Ass'n of Puget Sound v. City of Seattle*, 358 F. Supp. 3d 1095 (W.D. Wash. 2019), the court emphasized that housing regulations must be narrowly tailored and supported by actual evidence, not assumptions.

C. Claim: STR guests disrespect neighbors (noise, nudity, trash)

Rebuttal: The behavior of guests should be addressed through nuisance laws and noise ordinances that already exist, not via categorical bans on property use. Isolated incidents do not justify sweeping restrictions.

Case Law: In *Thomas v. City of St. Augustine*, 730 F. Supp. 1536 (M.D. Fla. 1990), the court held that the city could not impose discriminatory regulations on vacation rentals without concrete evidence of harm.

Example: Example: In Leavenworth, Washington—a similarly sized tourism town—the STR community formed a local Short-Term Rental Alliance in collaboration with the city. The association developed a self-regulation framework that includes agreed upon guest rules, a local contact network, and a community complaint hotline. Association members also commit to education, fire-safety protocols, and trash management standards. As a result, nuisance complaints dropped significantly, and enforcement costs for the city decreased. This collaborative model preserved neighborhood peace and STR rights without the need for heavy-handed regulation or bans.

D. Claim: STRs create low-wage jobs

Rebuttal: This argument is immaterial to land use law. The hospitality and tourism sectors are essential to rural economies, especially where industrial or high-wage jobs are scarce. STRs stimulate jobs in maintenance, hospitality, cleaning, and tourism services—sectors often filled by local small business owners and entrepreneurs.

Example: A study by the Economic Policy Institute (2018) found STRs in small towns support 2.6 indirect jobs for every 1 direct STR unit, many of which are small-business based.

E. Claim: Infrastructure (septic, water) cannot support the increased use

Rebuttal: STRs use existing residential infrastructure and are typically used intermittently—unlike full-time residential occupancy. Permits already require proof of functioning septic and water systems.

Legal Note: The proposed requirement that an STR must be on a parcel with an “approved septic or sewer” is already redundant with state building codes (WAC 246-272A), and may constitute regulatory overreach if used as a blanket denial mechanism.

F. Claim: Facilities (groceries) are insufficient

Rebuttal: This is not a zoning issue. Increased demand helps support rural stores that might otherwise close. Tourists boost off-season revenue for struggling businesses.

Example: In Mariposa County, CA (gateway to Yosemite), STR visitors increased grocery store revenue by over 25%, enabling year-round operation and expansion of services.

G. Claim: Emergency Services (EMS) are insufficient

Rebuttal: Transient population fluctuations are common in recreation towns. The appropriate response is to invest in EMS—not restrict STRs. Lodging taxes collected from STRs (e.g., Lewis County’s 4% lodging tax) can and should be allocated toward EMS capacity.

H. Claim: STRs reduce full-time residents and volunteer firefighters

Rebuttal: Volunteer shortages predate the STR boom and are linked more to rural depopulation than STRs. Many STR owners are part-time residents who still volunteer and contribute to the community.

III. REBUTTAL TO PROPOSED RESTRICTIONS IN PACKWOOD

1. Dwelling Unit Restrictions

Limiting STRs to one unit per two-unit parcel and banning them outright on parcels with four or more units is arbitrary and lacks a rational basis. These restrictions could constitute a regulatory taking under *Lucas v. South Carolina Coastal Council*, 505 U.S. 1003 (1992), if they deprive the owner of economically beneficial use of their property.

Example: In *Barron v. Baltimore*, 32 U.S. 243 (1833), and later in *Penn Central Transp. Co. v. NYC*, 438 U.S. 104 (1978), courts held that government must balance individual property rights with public benefit—blanket bans fail this test without data or due process.

2. Occupancy Limits

Limiting occupancy to two guests per bedroom plus three is unnecessarily strict and may conflict with the Fair Housing Act if it disproportionately affects families.

Case Law: In *Familystyle of St. Paul, Inc. v. City of St. Paul*, 728 F. Supp. 1396 (D. Minn. 1990), occupancy limits were deemed discriminatory when they did not serve a compelling governmental interest.

3. RV, Tent, Yurt Restrictions

These rules contradict the current Lewis County Code, which allows RVs and yurts as residences. Selective enforcement on STRs violates equal protection principles unless justified by demonstrable harm (*Village of Willowbrook v. Olech*, 528 U.S. 562 (2000)).

4. Commercial Events Ban

Prohibiting events like weddings is a zoning matter that should be addressed with a permit process, not a categorical ban. Many rural properties use events to supplement income, which is critical in areas with limited economic opportunity.

5. Parking, Signage, Local Contact Requirements

These are generally reasonable but must be applied equitably. Requirements such as having a local representative within Lewis County may violate the Commerce Clause (*Granholm v. Heald*, 544 U.S. 460 (2005)) by unduly burdening out-of-county property owners.

6. Non-transferability of Permits

Non-transferable permits diminish property value and liquidity, especially for retirees and single-income homeowners relying on STR income. This could be challenged under Washington's vested rights doctrine and as a restraint on alienation.

IV. CONCLUSION

In the past two years alone, courts have struck down short-term rental bans and policies that discriminate, restrict commerce, or fail to justify their impact (*South Lake Tahoe, California*, 2025; *New Orleans, Fifth Circuit*, 2023; *Glen Ellyn, Illinois*, 2025) .

Packwood's proposed regulations—notably the caps, occupancy limits, structure bans, and non-transferability—lack empirical support and violate constitutional protections under the Takings Clause, Equal Protection, Dormant Commerce Clause, and Washington's vested-rights doctrine. Unless grounded in clear evidence of harm, and narrowly tailored, they are legally vulnerable. Rather than protect the public interest, these rules disproportionately burden property owners, devalue private assets, and erode the legal foundation of property rights.

These restrictions will harm local families, reduce owner investment, and weaken the social and economic fabric of Packwood. Restricting responsible STR operations will not solve housing affordability, infrastructure deficits, or emergency service needs—but it will reduce tax revenue, hollow out the local economy, and punish law-abiding homeowners. A better path lies in stakeholder collaboration, enforceable behavior-focused rules, and self-regulation models that serve both public interests and private property rights. These proposals must be withdrawn or substantially revised before they expose the county to unnecessary litigation and long-term economic harm.

Sincerely,

Alison Weiss and family



From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Email from Commissioners Contact Form
Date: Monday, July 21, 2025 10:54:20 AM

Kate Chatterton

Administrative Assistant Sr

Lewis County Board of County Commissioners

360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: contact@lewiscountywa.gov <contact@lewiscountywa.gov>
Sent: Monday, July 21, 2025 1:59 AM
To: Tammy Martin <Tammy.Martin@lewiscountywa.gov>; Rieva Lester <Rieva.Lester@lewiscountywa.gov>; BOCC <BOCC@lewiscountywa.gov>
Subject: Email from Commissioners Contact Form

Name: Alison Weiss

Email: alisonweiss253@gmail.com

Message: Dear Commissioners and Planning Staff, As an educator, a military wife, and a mother of five, I have dedicated my life to serving others, building community, and creating a stable future for my family. Our short-term rental in Packwood isn't just an investment—it's our lifeline. It helps us afford rising costs, support our children's needs, and contribute to a town we've come to love and care about deeply. I'm not a corporation or an absentee landlord—I'm a semi-local mom doing what I can to make ends meet. This is a personal response to the proposed short-term rental restrictions in Packwood, which I believe will do more harm than good to families like mine, to responsible property owners, and to the economic future of our community. I ask that you consider both the legal framework and the lived realities behind these regulations. In the past two years alone, courts have struck down short-term rental bans and policies that discriminate, restrict commerce, or fail to justify their impact (South Lake Tahoe, California, 2025; New Orleans, Fifth Circuit, 2023; Glen Ellyn, Illinois, 2025) .

Packwood's proposed regulations—notably the caps, occupancy limits, structure bans, and non-transferability—lack empirical support and violate constitutional protections under the Takings Clause, Equal Protection, Dormant Commerce Clause, and Washington's vested-rights doctrine. Unless grounded in clear evidence of harm, and narrowly tailored, they are legally flawed. Rather than protect the public interest, these rules disproportionately burden property owners, devalue private assets, and erode the legal foundation of property rights. These restrictions will harm local families, reduce

owner investment, and weaken the social and economic fabric of Packwood. Restricting responsible STR operations will not solve housing affordability, infrastructure deficits, or emergency service needs—but it will reduce tax revenue, hollow out the local economy, and punish law-abiding homeowners. A better path lies in stakeholder collaboration, and self-regulation models that serve both public interests and private property rights. These proposals must be withdrawn or substantially revised before they expose the county to unnecessary litigation and long-term economic harm. Thank you.

User Agent: Mozilla/5.0 (iPhone; CPU iPhone OS 18_5 like Mac OS X)

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July 21, 2025

Mindy Brooks
Community Development Director
Lewis County Community Development Department
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Ms. Brooks & the Lewis County Commissioners,

We would like to reiterate our deep concern and opposition to the proposed Short Term Rental (STR) regulations currently under consideration for Lewis County. This is a follow-up letter in response to the public hearing that was held on July 8.

- 1) The commissioners expressed surprise at the fact that there was such a significant community response, noting that “this topic has been underway for three years.” But it is abundantly clear that the regulations and discussions all initiated in Packwood, a very unique niche town. But then, at some point in May or June 2025, the commissioners decided to apply these proposed regulations COUNTY WIDE with no community input, research and considerations given. Obviously, **a major group of stakeholders was omitted from the previous years’ conversations (i.e. all STR owners of Lewis County, outside of Packwood).** The vast majority of Lewis county is RURAL, and not like Packwood. Research and due diligence must be applied to the regulations, should you wish to apply them county wide.
- 2) **We believe the parcel limitation should be removed from the proposed regulations altogether. It would not help the communities it intends to help, and it would also hurt healthy small businesses and farmers like us, and our network of local residents and resources that would also lose jobs due to this restriction.**

The commissioners stated in closing remarks that their intent was to allow all existing STRs to continue operation. Yet, with the proposed parcel limitation of STRs, you will instantly restrict STR owners like us who own two STRs on our parcel, to only one unit. This would cut our STR income in half, causing us to lose approximately \$50,000 in revenue per year. Revenue that we count on to keep our small farm afloat, and to pay back the investment it took to build a second unit on our property. This particular regulation was written with the intent to increase affordable housing options, but you and the commissioners admitted in closing remarks, that regulating STRs will have little effect on affordable housing.

And furthermore, to re-state what many of us brought up in the July 8 hearing, restricting property owners with STRs to one STR per parcel could be considered a regulatory taking. Our small farm business would be deprived of a significant amount of economic value and beneficial use on our property should this be applied. Preventing us from using our second dwelling unit for income generation—when no prior restriction existed—undermines our property rights and our ability to make responsible, productive use of our land.

- 3) **Due to privacy concerns**, we ask that the following requirement be removed from the proposal: “The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road.”

And also, “Local means within Lewis County” is a highly unreasonable request, considering the distance of communities like Mineral and Ashford from Lewis County services, and the proximity to services in Pierce County within minutes. How could someone potentially as far away as Chehalis be a “local representative”? This is projecting excessive and unnecessary regulation on Lewis County constituents.

- 4) **“Good neighbor standards” for waste receptacles** – another excessive and unreasonable request. How could we possibly store garbage cans indoors when LeMay Waste Services requires our cans to be put out by the highway (which is ¼ mile from the nearest building on our parcel), and we aren’t allowed to build a building near our property boundary due to setbacks and agricultural classification restrictions for property use and buildings? Regular homeowners have garbage too – will you require every resident to store their garbage indoors? Will you require LeMay Waste Services to carry keys to every STR’s secured indoor storage in order to collect waste? If not, then this is an impractical regulation.
- 5) **Unique stays** – You repeatedly mentioned that “unique stay” properties with several tiny houses, yurts or vintage RVs would be considered Transient Accommodations and STRs regulations would not apply. But Transient Accommodations only apply when you have 3 or more of these units. What about properties with only 1 or 2? Would they be considered Transient Accommodations, or STRs? Would they be restricted to the parcel limitations as well? Do you plan to streamline and simplify the permitting of these units and relax energy regulations, due to the fact that tiny homes, domes, etc are inherently energy efficient due to their size? Currently, the permitting process for these unique stay units is a nightmare for everyone involved: owners, inspectors and permitting officers.
- 6) **Permit transfer** – as we understand it, you would require STR owners to a) comply with a lengthy list of regulations, b) have a business license, c) apply and pay for an STR license, and d) the assessors have determined that our STRs have an economic value (as stated during the July 8 hearing, during discussion of the assessors and that they assign additional value to properties with STRs), then why prohibit transfer of permit upon transfer of ownership? **With all of the previous attributes, STRs are therefore a business, and should be transferable as such upon transfer of ownership.**

We ask again that the commissioners of Lewis County please approach this issue with balance and care. STRs are not just a "luxury" or nuisance—they are a vital part of how many working families survive in Lewis County, especially those of us trying to keep family farms alive for the next generation. By suffocating a healthy and thriving small business sector with regulations, you run the risk of forcing heartfelt, prideful property owners like us to sell out to corporations and developers. This is a slippery slope, and would lead to a sad direction for the future of Lewis County.

Please don't put hard working Washingtonian families like ours out of business.

Sincerely,

A handwritten signature in black ink, appearing to be 'Stan Lin', with a long, sweeping horizontal line extending to the right.

Stan Lin & the Lin Family

Wildlin Farm

From: [Karli Devoe](#)
To: [Mindy Brooks](#)
Subject: Re: Packwood STRs
Date: Monday, July 21, 2025 3:57:43 PM

Testimony of Karli Devoe, Packwood resident, for Lewis County Planning Commission meeting on July 22nd, 2025

Karli Devoe
120 Edmonds Rd
Packwood, WA 98361
360-888-2818
karlidevoe@gmail.com

To my previous testimony, I would like to add the following:

-I have a business license issued to my address at 120 Edmonds Rd which is currently STMU, and am currently working on building a retail candy/books/antiques/stationery store with an attached commercial kitchen for making artisanal chocolates and sweets. I need the zoning in this area to continue to allow for small businesses to function.

-Also, my husband and I are hoping to continue renting transient accommodations, which I believe would also require the zoning on our street to continue to allow for businesses. We rent vintage trailers and the old White Pass Ticket Booth and want to make sure we are able to continue this, as it is currently our main source of income.

Thank you for your time.

Karli Devoe

On Wed, Jul 16, 2025 at 3:31 PM Mindy Brooks <Mindy.Brooks@lewiscountywa.gov> wrote:

Hi.

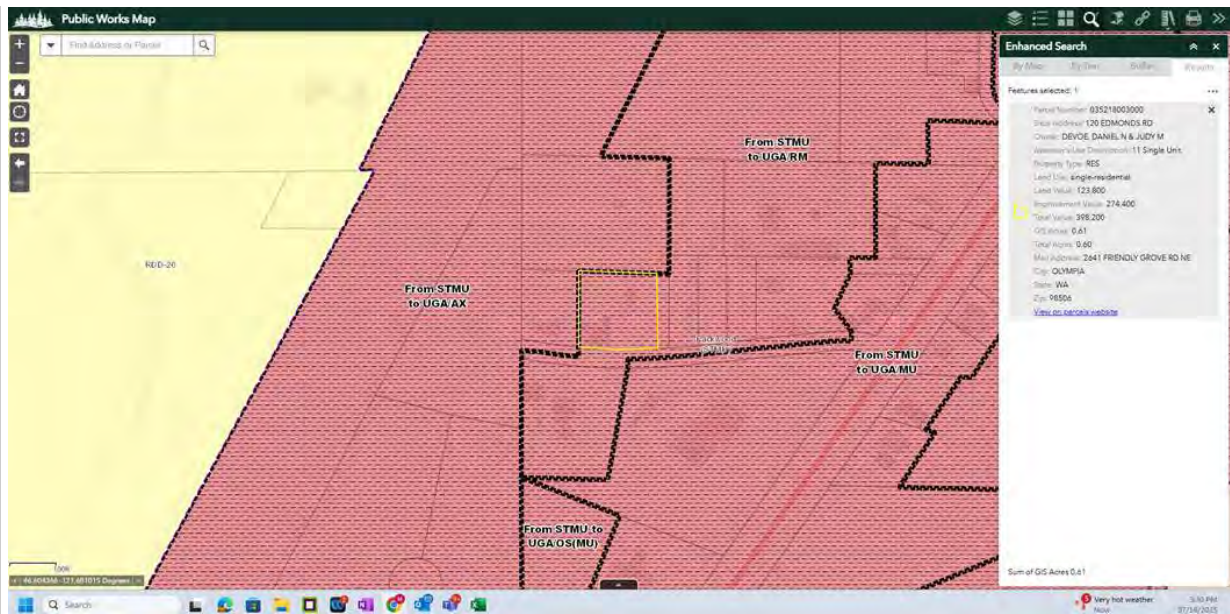
Thank you for providing testimony on the proposed development regulations and for meeting to talk with me about your situation. We spoke about the option of you asking for a different zoning designation. I wanted to provide a bit more information so you can decide if you would like to additionally submit testimony.

The current recommended zoning for your property is to change from Small Town Mixed Use (STMU) to Residential Medium (RM) zone (see map below). The RM zone was proposed for your property and the property to the south of you because staff assumed based on the Assessor data that both were residential uses.

Transient accommodations, which includes motels with detached units, is proposed to be not allowed in the RM zone. I believe your use is most like a motel with detached units because your units – vintage trailer, old ticket booth – are stationary units that you rent out. You could ask to have your zoning changed from RM to Mixed Use (MU) or Airport District (AX), which would allow transient accommodations. However, because we are not allowed to “spot zone” we would need to apply MU or AX to the property south of you as well. You can see the allowed uses for the MU and AX zones in this [proposed Table 2](#) and you can see the proposed regulations in the [UGA – Small Town proposed code](#). AX allows many fewer residential uses than MU. Please note, existing legal residential uses are vested.

If you'd like to have the Planning Commission consider this, please send testimony before 4:00pm on July 21.

Here is the map.



~

Mindy Brooks (she/her)

Director, Community Development

Lewis County

(360) 740-2610

July 21, 2025

Thank you for this opportunity to share my thoughts.

I am a longtime, voting, full time resident of Packwood. I have witnessed and been a part of the changing landscape here for the past 47 years. I worked for the Forest Service, White Pass Ski area, local restaurants, the local Doctor's office and have been a sole proprietor of my own massage therapy practice for 30 years now. My children went to school here and graduated from White Pass School High School.

Yes, things changed when the mill closed. But we were not a dying community. Yes, Packwood has always served as a destination vacation area, but there was a balance between local residents and visitors. That balance no longer exists. I would guess that the population doubles on any given summer weekend and many of them are disrespectful in a multitude of ways. And yet the same infrastructure that is here to serve the full time residents is all there is for handling the increase. It is overtaxed by too many people. Yes, sewer will change much of that strain, but how far out is that? Years!

I strongly support a CAP of 25% as proposed, NOW! And then reassess later. I believe it is overdue! And every single one of the other long time residents that I speak with, but who have not made their own voices heard, agree!

It has been a painful transition to surrender to what feels like a "take over" of our small peaceful living environment to a busy, noisy, congested one, in which there is so much more garbage floating around, long lines, neighborhoods disrupted, feeding the elk/wildlife creating a nuisance and a danger; not respecting burn bans which creates a potential hazard. The tourist spots are at capacity most weekends including the ski area in the winter and Mt Rainier the rest of the year. Camping areas and trail head parking lots are full, and TP and dog poop litters the trails. Emergency services are overtaxed; It is hard to get across the highway in downtown.

Over the past 5 years, my neighborhood has slowly been becoming a vacation playground. The nostalgic sentiment that was expressed about kids riding bikes in the streets is very different from what it was when my kids were growing up here in this same downtown area where I now live. There is more dangerous traffic at any given time of day. Although, for the most part people are quiet after 10 pm, this is not always the case.

I agree that garbage cans should not be left out on the street, by anyone, STR or fulltime residents, but requiring them to be all the way inside a building might be a little too much. As long as the cans are secure and someone local is responsible and present for any mess that might occur due to animals. I have picked up garbage in my neighborhood numerous times when new owners are still figuring out that they aren't in the city anymore!

I also support all the proposed regulations addressing health and safety requirements. I believe it is absolutely appropriate to have occupancy limits based on bedrooms and septic size. Cramming in as many people as possible is just an invitation for bad neighbor behavior, not to mention septic drainage. It would be ideal if STR owners formed relationships with full time resident neighbors as a kind of neighborhood watch to keep everyone safe and happy.

I support the proposed permit process and them being non transferrable.

I love Chairman Corbin's idea about the formation of an STRA so that there could be a collaborative effort. (And by the way, there were STR owner's represented on the Community Advisory Committee, but I think you already know that)

I think the CAP should be put in place NOW! along with the other commonsense regulations with an allowance for revisiting the issue in the future...not the other way around. These regulations are already long overdue.

The testimonies at the last hearing were indeed heartfelt and informative . I especially appreciated the level headed ones that made helpful suggestions. AND so many of the 3 hours of testimony were based on a false narrative that they would be losing what they already have. It was made clear in Mindy's presentation and in the written proposal that this was not the case. But the misunderstanding made for good support of their storyline.

I agree, that most STR owners operate a business that is safe and respectful and that violators should be held accountable. Having a contact number visibly available , or a number to call for all STRs collectively, is a step in the right direction for ending the few that are disruptive. Having more available local law enforcement would also be helpful. Agreed. It is not just visitors who cause disturbance, but local folks also, unfortunately.

The issue of affordable housing is complex as many recognize. I strongly believe that even though I cannot site a study providing factual evidence, as a long term renter in the community, my experiential knowledge, and common sense point to the fact that the STR market does indeed effect the overall housing market including availability for long term renters and even moderate income earners who would like to settle here and buy. I personally know too many quality community members who have left due to available and affordable housing issues. It's the people , not the money that makes a community strong and viable. Many of the quality people here now first began as seasonal workers. The opportunity for staying longterm seems hopeless as the housing market is now. Unless we put a cap on it now, rather than wait a couple years, in the meantime, people will be scrambling to increase the number of STRs exponentially. We must stop it now!

I have witnessed over my years here that this end of the county has been operating “ under the radar” in many ways, some good, some not. I assume that it is hard for some STR owners to swallow the fact that those days are over. Just as our days of clean, quiet living for full time residents has ended, so too , the taking advantage and exploitation of our resources is over for those coming in and seeing opportunity for such. STR's are a business/commercial enterprise and should be recognized as such!

One thing I think both STR owners and fulltime residents can agree upon is that we don't want corporate ownership to come in take over. There should be a limit as to how many STR's can be owned by one person or entity. And County beware that the corporate world will be sneaky about it!

Another point I'd like to make is that Money is not the only measure of community health. Let's not be greedy about growth. The people that own STR's and think they are doing us all a favor by stimulating the economy, don't send their children to school here, or vote on community issues, People didn't stay here when the mill closed because they wanted to make big money. What draws people here to begin with, is being eroded by overcrowding, desires for big city conveniences, and an infrastructure that isn't adequately keeping up. It seems that putting a CAP would be an advantage to the current STR owners so that the market isn't more diluted. I observe that every STR is not occupied every night or even every weekend.

And 6 months to get your permit seems adequate time with an allowance for special circumstances to be considered.

Please, lets pause the number of new STRs before more irreparable damage is done. That is the most responsible action the county can take at this time.

The time is NOW!

Thank you,
Cathy Lilienthal
P.O. Box 174
109 Rainier Ave S
Packwood, WA 98361

From: [Joe Loeffler](#)
To: [Mindy Brooks](#)
Subject: Written Testimony
Date: Monday, July 21, 2025 11:47:09 AM

To the Members of the Lewis County Planning Commission,

Thank you for your time, attention, and thoughtfulness throughout this process.

I am writing today to express my strong support for the amendment to the proposed short-term rental (STR) regulations introduced by the Chair. This amendment strikes a sensible and balanced path forward—it pauses sweeping new regulations while creating space for stakeholders to organize and collaborate on common-sense solutions.

We stand ready to engage in the process described in the amendment and are prepared to show that self-governance is not only possible, but effective. We hope this amendment marks the beginning of a productive and collaborative chapter in this conversation.

Please vote in support of the amendment and continue working with us to shape a regulatory framework that reflects the opportunities and future of Lewis County.

Respectfully,
Joe Loeffler
(206) 295-1567

Written Testimony for July 22 Planning Commission Meeting

To: Lewis County Planning Commission

Name: Briston Meidinger

Property: 408a Craig road, Packwood WA 98361

Phone: 360-789-1225

Email: Office@tmcvacationrentals.com / Briston@pacifictrailrealty.com

Dear Planning Commission Members,

My family owns and operates TMC Vacation Rentals in Packwood. We currently manage 62 properties in the Packwood area. My wife and I moved to Packwood in 2015 when I exited the military after 6 years of Active-duty service with the USAF. We still live here full time with our 2 kids and run TMC Vacation Rentals. I also own Pacific Trail Realty and have had an active real estate license since 2015. My wife and I are also currently board members of “Packwood Learning Community” which is a local 501(c)(3) non-profit for preschool age kids in our area. I also have a few years’ experience with managing long-term rentals here in East Lewis County. But that is not my primary focus these days.

I ask that you consider not supporting the proposed STR regulations by county staff. We have had affordable housing meetings since 2018 or so; And years of discussion about the sub area plan. But this recent proposal for county-wide restrictions seemingly came out of nowhere for a lot of people. I do not believe they would be in the best interest of our community.

I also think our STR community needs to do a better job of getting organized to address issues that full-time residents have with visiting guests. Speeding, noise, trespassing, etc. From my experience, it is pretty rare that we have those types of issues with our guests and neighbors. But issues do happen from time to time and are addressed quickly and effectively. I realize that an out-of-town host may not be able to remedy issues as fast. The formation of a group is now underway and one of its goals is to address some of these good neighbor type issues that have been mentioned.

There is a whole lot to discuss with the topic of STRs, long term rentals, our local economy, etc. So, if you have any questions or are just curious about maybe something specific that I may have knowledge of; feel free to reach out any time. We will probably have close to 3000 reservations in 2025 at TMC. Over the last 10 years we have had a lot of guest experiences, interactions, and general knowledge on subjects that we can share.

Thank you for your time,

Briston Meidinger

Manager, TMC Vacation Rentals

Designated Broker/Owner, Pacific Trail Realty

Public Comment Regarding Proposed STR Regulations – Lewis County Planning Committee

Dear Planning Committee Members,

As a responsible short-term rental (STR) property owner in Packwood, I appreciate the opportunity to provide public comment regarding the proposed regulations on STRs in Lewis County.

I urge the committee not to impose limits on the number of STRs in the county and to refrain from adding new regulations to those already in place. These changes could have unintended and far-reaching negative impacts on the local economy, private property rights, and community vitality.

1. STRs Support the Local Economy and Tourism

Packwood and Ashford are uniquely positioned as gateways to Mount Rainier National Park and the Gifford Pinchot National Forest. STRs are a vital piece of the tourism infrastructure. Unlike hotels or motels—which are few and often fully booked—STRs provide much-needed lodging capacity for families, hikers, skiers, and park visitors.

- Tourists spend money at local businesses, including restaurants, grocery stores, outfitters, gas stations, and more.
- STRs create jobs for housekeepers, handymen, landscapers, and property managers—many of whom live locally.
- Limiting STRs discourages investment, slows business growth, and reduces tax revenue generated through lodging and sales taxes.

If STR availability is artificially limited, tourists will simply book in neighboring counties like Pierce or Yakima, taking their tourism dollars elsewhere. This would be a major loss for local business owners and workers in Lewis County.

2. Limiting STRs Will Not Improve Housing Affordability

The argument that capping STRs will lead to more affordable housing is not supported by market realities. Housing prices are driven by many factors—construction costs, land availability, interest rates, and migration trends.

- Limiting STRs won't reduce home prices. Even if all STRs disappeared tomorrow, prices would continue to rise due to demand outpacing supply.
- STRs are self-regulating: if market saturation causes lower profits, or if owners can't find reliable cleaners or staff, they will voluntarily leave the STR market.

- Property owners won't convert to long-term rentals unless it's financially viable—and many rural homes are not suited for traditional rentals.
- If STR revenue drops below expectations, owners will sell, sit empty, or use homes as personal vacation properties, none of which guarantees affordable housing for working families.

3. STRs Improve Neighborhood Appearance and Maintenance

Contrary to the notion that STRs degrade neighborhoods, they often raise the standard of property care.

- STR owners are highly incentivized to maintain their homes, keeping them clean, attractive, and well-landscaped to appeal to guests and avoid complaints.
- STRs often renovate and repurpose formerly dilapidated or vacant homes, improving overall neighborhood appeal.
- By contrast, many long-term rentals and even owner-occupied homes in the area show signs of neglect—inoperable vehicles, overgrown yards, and trash accumulation.

Adding stricter regulation to STRs while ignoring the state of other properties sends the wrong message and punishes those who are actively investing in the community.

4. Property Rights and Regulatory Fairness

STR owners have invested significant time and money into their properties under the current zoning and regulatory framework. Retroactive policy changes erode property rights and community trust.

If new regulations are adopted, they must be applied evenly to all residential properties, including:

- Long-term rentals, which can cause the same or greater neighborhood disruptions.
- Owner-occupied homes, which are often exempt from rules that STRs must follow despite having similar impacts.

Fair governance requires a level playing field—not singling out STRs for targeted restrictions and compliance burdens.

5. STRs Fill a Flexible Housing Need

STRs support more than just tourism. They provide temporary housing for traveling professionals, seasonal workers, displaced families, and emergency responders. These guests rely on flexible, furnished accommodations in places where hotels are not a viable option.

Overregulating STRs would remove this essential layer of the housing market and reduce community resilience during times of crisis or seasonal demand.

In Closing

I respectfully request that the Lewis County Planning Committee:

- Reject any proposal to limit the number of STRs;
- Avoid adding unnecessary and burdensome regulations;
- And if regulations are revised, ensure they apply fairly across all residential property types, not just STRs.

Let's support a balanced approach that preserves neighborhood character, respects property rights, promotes economic vitality, and recognizes the real-world dynamics of the local housing and tourism markets.

Thank you for your service and consideration.

Sincerely,

James Peterson
Packwood Property Owner
253-820-5950

Primebuildnw@gmail.com

From: [Travis Redfield](#)
To: [Mindy Brooks](#)
Subject: Additional Comment on Short-Term Rental Regulations in Packwood
Date: Monday, July 21, 2025 3:44:48 PM

After attending the recent oral testimony regarding the proposed short-term rental (STR) regulations, I wanted to submit additional comments for your consideration.

At the end of the hearing, it was stated that the STR regulations are *not* aimed at addressing housing issues. This left me confused, as that had seemed to be one of the primary justifications leading up to this point. Wanting to better understand the rationale, I went back and reviewed several County Council meetings and workshop recordings on YouTube. What I consistently heard in those recordings were two primary concerns: (1) complaints about STRs being party houses or nuisances, and (2) a general negative sentiment toward STRs and visitors in Packwood.

Regarding the first point: In my neighborhood—and broadly around Packwood—I have not witnessed STRs causing problems. The STRs I’ve seen are clean, well-maintained, have proper parking, and are generally quiet. I often see families enjoying a peaceful stay, and appreciating the beauty of the area.

By contrast, some of the longer-term residences in our neighborhood are in poor condition—vehicles parked in yards, visible trash, and ongoing personal conflicts between neighbors that require authorities. I have seen consistent issues with these properties that go completely unregulated.

On the second point: I understand that, especially in the period after COVID, there was discomfort about Packwood changing and “outsiders” coming in. I’ll admit, I was uncertain at first too. But over time, I’ve come to appreciate the positive aspects of STRs. I’ve met owners who genuinely care about Packwood, and I’ve seen visitors bringing life and joy back into the area. It’s heartening to see people making memories here—families, couples, and outdoor enthusiasts alike.

I know the Commission is trying to balance many concerns, but I hope the final regulations reflect the diversity of actual lived experiences. Many STRs operate responsibly and make positive contributions to our community. I appreciate the opportunity to share mine.

Thank You

Travis Redfield

138 Tahoma St East

Packwood WA





State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

July 21st, 2025

Mindy Brooks
Lewis County Community Development
2025 NE Kresky Ave
Chehalis, WA 98532

Re: WDFW Comments on Proposed Lewis County Development Regulations

Dear Mindy,

Thank you for the opportunity to provide input on the proposed updates to Lewis County's development regulations. The Washington Department of Fish and Wildlife (WDFW) has reviewed the following chapters and offers comments to help ensure that critical areas, particularly Fish and Wildlife Habitat Conservation Areas (FWHCAs), are effectively protected in accordance with state law and best available science (BAS).

Our main points and recommendations are highlighted in bold throughout the letter for clarity. In addition to general policy guidance, we have provided suggested language for code additions and edits, including specific locations within the Lewis County Code where these recommendations could be incorporated to improve consistency with the Growth Management Act (GMA), Revised Code of Washington (RCW) 36.70A, and relevant Washington Administrative Code (WAC) provisions. These recommendations are provided for your consideration and are intended to support the County's planning efforts. Ultimately, Lewis County retains full discretion over how to incorporate or address these suggestions as part of the local decision-making process.

Chapter 16 Subdivisions

While we understand and support the intent to promote more efficient land use, our primary concern is regarding the subdivision of parcels that contain critical areas. The proposed increase in densities could result in subdivisions where newly created lots are heavily encumbered by critical areas, leaving little viable space for development. In these cases, reasonable use provisions may become the only viable option, leading to significant encroachment into these sensitive areas. This could have severe long-term impacts on the environment, including the loss of habitat, and increased vulnerability to natural hazards. To mitigate negative impacts from subdividing properties containing or adjacent to critical areas, WDFW recommends requiring a comprehensive environmental assessment for any parcel with mapped critical areas. This assessment should document the location and extent of these areas and evaluate how the proposed subdivision may affect them.

Recommended Code Addition: "For any subdivision proposal involving parcels containing or adjacent to critical areas as defined in the Lewis County Critical Areas Ordinance (Chapter 17.35), the applicant shall submit a comprehensive environmental assessment identifying critical areas and evaluating potential impacts."

Chapter 17.15 UGA Cities and Chapter 17.17 UGA Small Towns

WAC 365-196-310(4)(c)(iv) requires discouraging Urban Growth Area (UGA) expansions into critical areas unless it can be demonstrated that: "(A) The new development can be safely accommodated without impacting critical area functions and values; and (B) The infrastructure is provided in a manner that protects the environment." However, the current ordinances do not address this nor include criteria for protecting critical areas during UGA boundary modifications.

Recommendation: Add language requiring UGA expansions to be reviewed for consistency with WAC 365-196-310(4)(c)(iv) and RCW 36.70A.110(2), discouraging expansions into mapped critical areas.

WAC 365-196-335 requires counties to identify and designate open space corridors to support wildlife habitat connectivity and recreation, complemented by WAC 365-190-130 emphasizing habitat conservation for long-term ecological viability. The ordinance currently lacks mechanisms to map or protect these corridors when applying city zoning or approving developments within UGAs.

Recommendation: Incorporate provisions requiring identification, mapping, and protection of open space corridors and habitat linkages in coordination with WDFW's Priority Habitats and Species (PHS) and Washington Habitat Connectivity Action Plan (WAHCAP) data as part of UGA planning and development review.

Chapter 17.20E Master Planned Resort (MPR)

We would like to acknowledge and build upon our previous comment letter submitted on May 23, 2025, which outlined key environmental considerations for MPR designations within the county. We recognize that the MPR overlay provides an important foundation for environmental protection, particularly through Lewis County Code 17.20E.020(4), which mandates compliance with critical area regulations, and LCC 17.20E.050(1)(d), which requires environmental remediation if a project is abandoned. However, the current MPR ordinance allows water bodies to count toward the required 40% open space designation. While lakes, wetlands, and rivers offer ecological value, including them in the open space calculation can diminish the intent of preserving functional upland habitat and recreational space.

In alignment with WAC 365-190-130, which highlights the importance of meaningful habitat protection in land use planning, we recommend that open water areas be excluded from the 40% open space requirement. Instead, the open space requirement should apply only to upland and terrestrial land cover to better support habitat structure, species movement, and passive recreation.

Recommended Code Addition (to LCC 17.20E.030 – Development Standards): "For the purposes of meeting the 40% open space requirement, only upland and terrestrial areas shall be counted. Open water features, including lakes, reservoirs, or ponds, may be preserved as environmental assets but shall not contribute to the minimum open space calculation."

Given the ecological sensitivity of the proposed MPR sites, including the former TransAlta mine and the Thompson Road area, WDFW recommends that the County explicitly require identification and protection of open space corridors to avoid habitat fragmentation. This is supported by WAC 365-196-335, which directs counties to protect open space connections between critical areas and habitats. These corridors help maintain species movement and resilience and are especially vital for species listed as sensitive, threatened, or endangered by WDFW.

Recommended Code Addition (to LCC 17.20E.030 – Development Standards or 17.20E.040): "All Master Planned Resort proposals shall identify and preserve open space corridors that maintain or enhance habitat connectivity between critical areas. Such corridors shall be mapped during site planning and incorporated into long-term conservation areas through easements, buffers, or other permanent mechanisms."

By implementing these targeted updates, clarifying open space standards, requiring robust environmental review, and preserving habitat connectivity, Lewis County can advance the intent of the Growth Management Act to ensure no net loss of ecological function in its most sensitive landscapes. WDFW stands ready to provide technical assistance, mapping tools, and species data to help the County implement these improvements and ensure the long-term success of the Master Planned Resort framework.

Chapter 17.127 Energy Facilities

The current language broadly addresses minimizing impacts on natural resources but does not explicitly require compliance with the Lewis County Critical Areas Ordinance (CAO). Per RCW 36.70A.060 and RCW 36.70A.172, counties must protect critical areas such as wetlands, fish and wildlife habitat conservation areas, and aquifer recharge zones through locally adopted regulations. We recommend incorporating a clear requirement that all energy facility proposals comply with the CAO to ensure consistent protections of critical areas.

Recommended Code Addition: “All energy facility proposals shall comply with the applicable requirements of the Lewis County Critical Areas Ordinance (LCC Chapter 17.35)”

The ordinance should require early and ongoing coordination with state agencies throughout planning, review, and permitting processes for energy facilities, especially where critical areas are present. WDFW is available to provide technical assistance and guidance for project locations containing PHS.

Recommended Code Addition: “Where energy facility proposals occur within or adjacent to mapped critical areas, applicants shall coordinate with the appropriate state agency during pre-application, permitting, and environmental review processes to ensure no net loss per RCW 36.70A.060 and WAC 365-190-130.”

Chapter 17.142.210 Surface Mining

We urge the County to explicitly require that all surface mining proposals comply fully with the Lewis County Critical Areas Ordinance. Surface mining operations inherently disturb the land and can impact wetlands, riparian areas, and other critical habitats that provide important ecological functions. Compliance with the CAO is essential to avoid net loss of priority habitats and maintain ecosystem function consistent with RCW 36.70A.060 and RCW 36.70A.172.

Recommended Code Addition: “All surface mining operations, regardless of location, shall comply with the applicable requirements of the Lewis County Critical Areas Ordinance.”

The ordinance should clearly require that applicants identify and map critical areas on proposed mining sites, including wetlands, streams, and PHS as defined by WDFW. WDFW welcomes opportunities to provide technical review and assistance on Environmental Impact Statements (EIS) or mitigation plans associated with surface mining projects to ensure that fish and wildlife habitat impacts are properly identified and addressed.

Recommended Code Addition: “Surface mining special use permit applications must include detailed mapping of existing site features and critical areas, and the County may request consultation with WDFW for evaluation of Priority Habitats and Species.”

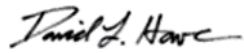
WDFW appreciates the opportunity to collaborate with Lewis County in strengthening the protections for critical areas and supporting sustainable growth. We encourage the County to carefully consider these recommendations to enhance the conservation of critical areas. WDFW remains available to provide technical assistance, data, and guidance as needed throughout the ongoing planning and implementation process.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Brittney Salter". The signature is written in a cursive, flowing style.

Brittney Salter
WDFW Southwest Washington Land Use Planning Lead

Reviewed and approved by:

A handwritten signature in black ink, appearing to read "David L. Howe". The signature is written in a cursive, flowing style.

Dave Howe, WDFW Region 5 Habitat Program Manager
Jessica McConnell, WDFW Region 5 Assistant Habitat Program Manager

July 20, 2025

1

To:

Lewis County Commissioners and Planning Commission
Lewis County Community Development Department
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Commissioners and Planning Staff,

As a teacher, a military wife, and a mother of five, I have dedicated my life to serving others, building community, and creating a stable future for my family. Our short-term rental in Packwood isn't just an investment—it's our lifeline. It helps us afford rising costs, support our children's needs, and contribute to a town we've come to love and care about deeply. I'm not a corporation or an absentee landlord—I'm a semi-local mom doing what I can to make ends meet. This memorandum is both a legal and personal response to the proposed short-term rental restrictions in Packwood, which I believe will do more harm than good to families like mine, to responsible property owners, and to the economic future of our community. I ask that you consider both the legal framework and the lived realities behind these regulations.

Sincerely,

Alison Weiss
Home Owner
112 Fairway Drive
Packwood, WA 9836

1
alisonweiss253@gmail.com
(253) 732-3884

I. INTRODUCTION

Short-term rentals have become a vital economic and cultural component of rural communities, especially in tourist-reliant towns like Packwood. Recent proposals seek to heavily restrict the operation of STRs through zoning limitations, occupancy rules, and categorical bans on certain types of dwellings. These restrictions, however, rest on assumptions unsupported by robust data, conflict with constitutional and statutory property rights, and risk economic harm to homeowners and the broader community.

II. REBUTTAL TO CLAIMED NEGATIVE IMPACTS OF STRs

A. Claim: STRs drive up property values

Rebuttal: This claim misinterprets the role of STRs in housing markets. While STRs may impact housing demand slightly, they are not a primary driver of rising property values in rural areas. Housing prices are influenced primarily by macroeconomic trends, such as post-pandemic migration patterns, inflation, and interest rates.

Case Law: In *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365 (1926), the Supreme Court held that zoning must be justified by a clear public interest. Mere speculation about property values is not sufficient. Courts continue to scrutinize zoning ordinances that unfairly burden specific property uses without substantial evidence (see *City of Ladue v. Gilleo*, 512 U.S. 43 (1994)).

Example: A 2020 study by the Urban Institute found that while STRs may have marginal effects on housing prices in large cities, the impact in rural towns is statistically insignificant and often offset by the benefits of increased tourism dollars.

B. Claim: STRs reduce affordable housing by converting long-term rentals

Rebuttal: Affordable housing shortages are a result of underbuilding, not STRs. In fact, many STRs are owner-occupied secondary homes, vacation homes, or cabins that were never available for long-term rental. Limiting STRs will not suddenly turn vacation homes into long-term rentals; instead, they may sit vacant, generating no local economic activity or tax revenue.

Example: In Lake Chelan, WA, strict STR limits were followed by a decrease in tourism-related tax revenue and no measurable increase in available long-term rentals. This suggests that STR units are not easily convertible.

Legal Perspective: In *Rental Housing Ass'n of Puget Sound v. City of Seattle*, 358 F. Supp. 3d 1095 (W.D. Wash. 2019), the court emphasized that housing regulations must be narrowly tailored and supported by actual evidence, not assumptions.

C. Claim: STR guests disrespect neighbors (noise, nudity, trash)

Rebuttal: The behavior of guests should be addressed through nuisance laws and noise ordinances that already exist, not via categorical bans on property use. Isolated incidents do not justify sweeping restrictions.

Case Law: In *Thomas v. City of St. Augustine*, 730 F. Supp. 1536 (M.D. Fla. 1990), the court held that the city could not impose discriminatory regulations on vacation rentals without concrete evidence of harm.

Example: Example: In Leavenworth, Washington—a similarly sized tourism town—the STR community formed a local Short-Term Rental Alliance in collaboration with the city. The association developed a self-regulation framework that includes agreed upon guest rules, a local contact network, and a community complaint hotline. Association members also commit to education, fire-safety protocols, and trash management standards. As a result, nuisance complaints dropped significantly, and enforcement costs for the city decreased. This collaborative model preserved neighborhood peace and STR rights without the need for heavy-handed regulation or bans.

D. Claim: STRs create low-wage jobs

Rebuttal: This argument is immaterial to land use law. The hospitality and tourism sectors are essential to rural economies, especially where industrial or high-wage jobs are scarce. STRs stimulate jobs in maintenance, hospitality, cleaning, and tourism services—sectors often filled by local small business owners and entrepreneurs.

Example: A study by the Economic Policy Institute (2018) found STRs in small towns support 2.6 indirect jobs for every 1 direct STR unit, many of which are small-business based.

E. Claim: Infrastructure (septic, water) cannot support the increased use

Rebuttal: STRs use existing residential infrastructure and are typically used intermittently—unlike full-time residential occupancy. Permits already require proof of functioning septic and water systems.

Legal Note: The proposed requirement that an STR must be on a parcel with an “approved septic or sewer” is already redundant with state building codes (WAC 246-272A), and may constitute regulatory overreach if used as a blanket denial mechanism.

F. Claim: Facilities (groceries) are insufficient

Rebuttal: This is not a zoning issue. Increased demand helps support rural stores that might otherwise close. Tourists boost off-season revenue for struggling businesses.

Example: In Mariposa County, CA (gateway to Yosemite), STR visitors increased grocery store revenue by over 25%, enabling year-round operation and expansion of services.

G. Claim: Emergency Services (EMS) are insufficient

Rebuttal: Transient population fluctuations are common in recreation towns. The appropriate response is to invest in EMS—not restrict STRs. Lodging taxes collected from STRs (e.g., Lewis County’s 4% lodging tax) can and should be allocated toward EMS capacity.

H. Claim: STRs reduce full-time residents and volunteer firefighters

Rebuttal: Volunteer shortages predate the STR boom and are linked more to rural depopulation than STRs. Many STR owners are part-time residents who still volunteer and contribute to the community.

III. REBUTTAL TO PROPOSED RESTRICTIONS IN PACKWOOD

1. Dwelling Unit Restrictions

Limiting STRs to one unit per two-unit parcel and banning them outright on parcels with four or more units is arbitrary and lacks a rational basis. These restrictions could constitute a regulatory taking under *Lucas v. South Carolina Coastal Council*, 505 U.S. 1003 (1992), if they deprive the owner of economically beneficial use of their property.

Example: In *Barron v. Baltimore*, 32 U.S. 243 (1833), and later in *Penn Central Transp. Co. v. NYC*, 438 U.S. 104 (1978), courts held that government must balance individual property rights with public benefit—blanket bans fail this test without data or due process.

2. Occupancy Limits

Limiting occupancy to two guests per bedroom plus three is unnecessarily strict and may conflict with the Fair Housing Act if it disproportionately affects families.

Case Law: In *Familystyle of St. Paul, Inc. v. City of St. Paul*, 728 F. Supp. 1396 (D. Minn. 1990), occupancy limits were deemed discriminatory when they did not serve a compelling governmental interest.

3. RV, Tent, Yurt Restrictions

These rules contradict the current Lewis County Code, which allows RVs and yurts as residences. Selective enforcement on STRs violates equal protection principles unless justified by demonstrable harm (*Village of Willowbrook v. Olech*, 528 U.S. 562 (2000)).

4. Commercial Events Ban

Prohibiting events like weddings is a zoning matter that should be addressed with a permit process, not a categorical ban. Many rural properties use events to supplement income, which is critical in areas with limited economic opportunity.

5. Parking, Signage, Local Contact Requirements

These are generally reasonable but must be applied equitably. Requirements such as having a local representative within Lewis County may violate the Commerce Clause (*Granholm v. Heald*, 544 U.S. 460 (2005)) by unduly burdening out-of-county property owners.

6. Non-transferability of Permits

Non-transferable permits diminish property value and liquidity, especially for retirees and single-income homeowners relying on STR income. This could be challenged under Washington's vested rights doctrine and as a restraint on alienation.

IV. CONCLUSION

In the past two years alone, courts have struck down short-term rental bans and policies that discriminate, restrict commerce, or fail to justify their impact (*South Lake Tahoe, California*, 2025; *New Orleans, Fifth Circuit*, 2023; *Glen Ellyn, Illinois*, 2025) .

Packwood's proposed regulations—notably the caps, occupancy limits, structure bans, and non-transferability—lack empirical support and violate constitutional protections under the Takings Clause, Equal Protection, Dormant Commerce Clause, and Washington's vested-rights doctrine. Unless grounded in clear evidence of harm, and narrowly tailored, they are legally vulnerable. Rather than protect the public interest, these rules disproportionately burden property owners, devalue private assets, and erode the legal foundation of property rights.

These restrictions will harm local families, reduce owner investment, and weaken the social and economic fabric of Packwood. Restricting responsible STR operations will not solve housing affordability, infrastructure deficits, or emergency service needs—but it will reduce tax revenue, hollow out the local economy, and punish law-abiding homeowners. A better path lies in stakeholder collaboration, enforceable behavior-focused rules, and self-regulation models that serve both public interests and private property rights. These proposals must be withdrawn or substantially revised before they expose the county to unnecessary litigation and long-term economic harm.

Sincerely,

Alison Weiss and family



From: [Kathryn Chatterton](#)
To: [Mindy Brooks](#)
Subject: FW: Email from Commissioners Contact Form
Date: Monday, July 21, 2025 10:54:20 AM

Kate Chatterton

Administrative Assistant Sr

Lewis County Board of County Commissioners

360-740-1120 | Kathryn.Chatterton@lewiscountywa.gov

From: contact@lewiscountywa.gov <contact@lewiscountywa.gov>
Sent: Monday, July 21, 2025 1:59 AM
To: Tammy Martin <Tammy.Martin@lewiscountywa.gov>; Rieva Lester <Rieva.Lester@lewiscountywa.gov>; BOCC <BOCC@lewiscountywa.gov>
Subject: Email from Commissioners Contact Form

Name: Alison Weiss

Email: alisonweiss253@gmail.com

Message: Dear Commissioners and Planning Staff, As an educator, a military wife, and a mother of five, I have dedicated my life to serving others, building community, and creating a stable future for my family. Our short-term rental in Packwood isn't just an investment—it's our lifeline. It helps us afford rising costs, support our children's needs, and contribute to a town we've come to love and care about deeply. I'm not a corporation or an absentee landlord—I'm a semi-local mom doing what I can to make ends meet. This is a personal response to the proposed short-term rental restrictions in Packwood, which I believe will do more harm than good to families like mine, to responsible property owners, and to the economic future of our community. I ask that you consider both the legal framework and the lived realities behind these regulations. In the past two years alone, courts have struck down short-term rental bans and policies that discriminate, restrict commerce, or fail to justify their impact (South Lake Tahoe, California, 2025; New Orleans, Fifth Circuit, 2023; Glen Ellyn, Illinois, 2025) . Packwood's proposed regulations—notably the caps, occupancy limits, structure bans, and non-transferability—lack empirical support and violate constitutional protections under the Takings Clause, Equal Protection, Dormant Commerce Clause, and Washington's vested-rights doctrine. Unless grounded in clear evidence of harm, and narrowly tailored, they are legally flawed. Rather than protect the public interest, these rules disproportionately burden property owners, devalue private assets, and erode the legal foundation of property rights. These restrictions will harm local families, reduce

owner investment, and weaken the social and economic fabric of Packwood. Restricting responsible STR operations will not solve housing affordability, infrastructure deficits, or emergency service needs—but it will reduce tax revenue, hollow out the local economy, and punish law-abiding homeowners. A better path lies in stakeholder collaboration, and self-regulation models that serve both public interests and private property rights. These proposals must be withdrawn or substantially revised before they expose the county to unnecessary litigation and long-term economic harm. Thank you.

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]

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Stan Lin
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(253) 256-2538

July 21, 2025

Mindy Brooks
Community Development Director
Lewis County Community Development Department
2025 NE Kresky Ave
Chehalis, WA 98532

Dear Ms. Brooks & the Lewis County Commissioners,

We would like to reiterate our deep concern and opposition to the proposed Short Term Rental (STR) regulations currently under consideration for Lewis County. This is a follow-up letter in response to the public hearing that was held on July 8.

- 1) The commissioners expressed surprise at the fact that there was such a significant community response, noting that “this topic has been underway for three years.” But it is abundantly clear that the regulations and discussions all initiated in Packwood, a very unique niche town. But then, at some point in May or June 2025, the commissioners decided to apply these proposed regulations COUNTY WIDE with no community input, research and considerations given. Obviously, **a major group of stakeholders was omitted from the previous years’ conversations (i.e. all STR owners of Lewis County, outside of Packwood).** The vast majority of Lewis county is RURAL, and not like Packwood. Research and due diligence must be applied to the regulations, should you wish to apply them county wide.
- 2) **We believe the parcel limitation should be removed from the proposed regulations altogether. It would not help the communities it intends to help, and it would also hurt healthy small businesses and farmers like us, and our network of local residents and resources that would also lose jobs due to this restriction.**

The commissioners stated in closing remarks that their intent was to allow all existing STRs to continue operation. Yet, with the proposed parcel limitation of STRs, you will instantly restrict STR owners like us who own two STRs on our parcel, to only one unit. This would cut our STR income in half, causing us to lose approximately \$50,000 in revenue per year. Revenue that we count on to keep our small farm afloat, and to pay back the investment it took to build a second unit on our property. This particular regulation was written with the intent to increase affordable housing options, but you and the commissioners admitted in closing remarks, that regulating STRs will have little effect on affordable housing.

And furthermore, to re-state what many of us brought up in the July 8 hearing, restricting property owners with STRs to one STR per parcel could be considered a regulatory taking. Our small farm business would be deprived of a significant amount of economic value and beneficial use on our property should this be applied. Preventing us from using our second dwelling unit for income generation—when no prior restriction existed—undermines our property rights and our ability to make responsible, productive use of our land.

- 3) **Due to privacy concerns**, we ask that the following requirement be removed from the proposal: “The name and phone number of the local property representative, who can be reached 24 hours per day, shall be posted so it is clearly visible from the road.”

And also, “Local means within Lewis County” is a highly unreasonable request, considering the distance of communities like Mineral and Ashford from Lewis County services, and the proximity to services in Pierce County within minutes. How could someone potentially as far away as Chehalis be a “local representative”? This is projecting excessive and unnecessary regulation on Lewis County constituents.

- 4) **“Good neighbor standards” for waste receptacles** – another excessive and unreasonable request. How could we possibly store garbage cans indoors when LeMay Waste Services requires our cans to be put out by the highway (which is ¼ mile from the nearest building on our parcel), and we aren’t allowed to build a building near our property boundary due to setbacks and agricultural classification restrictions for property use and buildings? Regular homeowners have garbage too – will you require every resident to store their garbage indoors? Will you require LeMay Waste Services to carry keys to every STR’s secured indoor storage in order to collect waste? If not, then this is an impractical regulation.
- 5) **Unique stays** – You repeatedly mentioned that “unique stay” properties with several tiny houses, yurts or vintage RVs would be considered Transient Accommodations and STRs regulations would not apply. But Transient Accommodations only apply when you have 3 or more of these units. What about properties with only 1 or 2? Would they be considered Transient Accommodations, or STRs? Would they be restricted to the parcel limitations as well? Do you plan to streamline and simplify the permitting of these units and relax energy regulations, due to the fact that tiny homes, domes, etc are inherently energy efficient due to their size? Currently, the permitting process for these unique stay units is a nightmare for everyone involved: owners, inspectors and permitting officers.
- 6) **Permit transfer** – as we understand it, you would require STR owners to a) comply with a lengthy list of regulations, b) have a business license, c) apply and pay for an STR license, and d) the assessors have determined that our STRs have an economic value (as stated during the July 8 hearing, during discussion of the assessors and that they assign additional value to properties with STRs), then why prohibit transfer of permit upon transfer of ownership? **With all of the previous attributes, STRs are therefore a business, and should be transferable as such upon transfer of ownership.**

We ask again that the commissioners of Lewis County please approach this issue with balance and care. STRs are not just a "luxury" or nuisance—they are a vital part of how many working families survive in Lewis County, especially those of us trying to keep family farms alive for the next generation. By suffocating a healthy and thriving small business sector with regulations, you run the risk of forcing heartfelt, prideful property owners like us to sell out to corporations and developers. This is a slippery slope, and would lead to a sad direction for the future of Lewis County.

Please don't put hard working Washingtonian families like ours out of business.

Sincerely,

A handwritten signature in black ink, appearing to be 'Stan Lin', with a long, sweeping horizontal line extending to the right.

Stan Lin & the Lin Family

Wildlin Farm