



HOCKING HILLS
LODGING OWNERS
ASSOCIATION

List of Concerns to Draft #6

There is absolutely no reference to grandfathering the hundreds of lodging owners that have consistently paid bed taxes, followed existing rules, and prioritized guest safety.

Section-Specific Issues

Section 1

Win-Win: There is no mention of the STR's interest, or a Win-Win as proposed in the Town Hall held in October.

Section 3

Documentation from local agencies: How long will the Tax Administrator, County Health Department, etc. have to provide owners with the required documentation. Will there be a streamlined process for obtaining this documentation?

Background Check: What cost will be involved with this and must it be completed each year at renewal? What county office will be handling this requirement?

Water testing: We believe this information is incorrect. Water sampling is done by the EPA. The comment references Septic. Please verify if this is well or septic.

Inspections/Fees: Fee schedule should be provided. There are no caps to the amount of inspections and costs that could accumulate to an owner with the way this is currently worded.

Section 4

Local Contact: The names and times each local contact person is available could change from day to day- the requirement to specifically list out the names and times for each day is not feasible. Please verify that the 24-contact person must be awake at all times. Example: STR owner lives next door to their STR and is the local contact person- must they hire someone to field calls while they sleep?

Guest Acknowledgement: Are "check box" acceptable? Many listing platforms like Airbnb don't allow an opportunity to obtain wet signatures from guests and don't allow for outside agreements off platform.



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Decks: Is this required to be signed off on by someone? There are no clear definitions.

Landscaping: Leaving this up to the “discretion of the STR Administrator” is vague and may not be implemented uniformly across the board. This section seems unnecessary and extremely costly to those needing to implement.

Two Points of Egress: Clear code citations and definitions are required, especially for second-floor bedrooms. What counts as an egress window in a second story bedroom?

Signage and Similar Standards: *Heights?* Existing STRs should be reasonably grandfathered to avoid costly retroactive upgrades.

Building Standards: The reasoning comments reference buildings “being built” What is the intent for existing structures? The exact standards being referenced must be clearly identified and made available to owners. Is part of the STR inspection a building code compliance inspection? Building code standards include terms for grandfathering and variances, we assume those terms will be honored even though they aren’t mentioned in the proposal.

Required Parking: the language has been changed in this draft to say “Parking that is within a private driveway does not count” please revise

Section 5

Bridge Crossing- requiring bridge crossings to support ANY vehicles or equipment is too vague

Section 6

Committee to hear Variances: Who will make up this board? What industries, expertise, office holders? How will they be selected? If the board would be completed through a separate ordinance, shouldn't that ordinance be completed before approving this one?

Additional Clarifications Needed

Does “building standards” require existing STRs to be brought up to current code? Greater clarity is needed regarding the specific building, fire, and safety codes being referenced, as well as limits on inspection and compliance costs.

What structures are prohibited from operating as STRs?



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What deck safety standards apply and who will be signing off on this?

Is the 200-foot landscaping requirement realistic for all properties?

No recognition for grandfathering current owners that are in good standing with paying bed taxes and not having complaints against them.

Many properties will require a variance to obtain a permit- the parameters explaining how the STR Variance Board will be made up should be clear.

General Concerns

The proposed regulations single out existing short-term rentals (STRs), even though many of the same risks apply to long-term rentals, other businesses, and residences. Retroactively imposing new requirements on established STRs will create financial hardship on many current business owners and in some cases the requirements can not be met as written. New construction is different; those owners know the rules upfront.

Conclusion

We support a simplified and concise permit process that encourages safety for our guests and support for our emergency services. The current draft lacks clarity, consistency, and leaves important requirements up for interpretation—particularly for existing STRs that have operated safely for years. Many of the requirements are redundant and could be covered during the process STR owners already complete while registering with the Lodging Tax Administrator.