

# CITY COUNCIL STAFF REPORT

DATE: SEPTEMBER 29, 2022 BUSINESS & LEGISLATIVE

SUBJECT: REVIEW AND DISCUSSION OF VACATION RENTAL WORKGROUP

**RECOMMENDATIONS** 

FROM: Teresa Gallavan, Interim City Manager

BY: Special Program Compliance

#### SUMMARY:

The purpose of this staff report is to give City Council the opportunity to review and discuss the recommendations of the Vacation Rental Work Group. Additionally, if City Council finds it appropriate, provide direction to staff for vacation rental ordinance revisions to bring forward for a public meeting.

#### **RECOMMENDATION:**

Provide direction to staff for drafting vacation rental ordinance revisions.

#### BACKGROUND:

On March 29, 2022, the City Council held a Special Study Session to discuss the state of vacation rentals in the City. A comprehensive report was presented to Council outlining various data metrics for vacation rentals. Following a presentation by staff, Council discussed the current state of vacation rentals, and staff subsequently created a working group to review additional data and draft recommendations to allow policy choices.

The group reviewed data and discussed impacts to the City relating to vacation rental density, ancillary use, and housing prior to drafting recommendations. The group consists of real estate professionals, vacation rental industry stakeholders, ONE-PS members, and community members randomly selected after applying; a total of 124 applications were received. Group members actively participated in the discussions, abided by the Rules of Engagement, worked hard on the issues, and provided feedback.

#### **STAFF ANALYSIS:**

City Council directed staff and the working group to address the following issues:

- Vacation Rental Density
- Vacation Rentals as an ancillary use or secondary use of one's property
- Impacts on Housing Supply

The work group makes the following recommendations to City Council:

- 2,500 Citywide vacation rental permits cap, with the stipulation that all submitted permit applications will be processed as well as applications for properties that have an escrow closing date within 30 days of the adopted ordinance.
- 10% neighborhood cap.

Attached hereto as **ATTACHMENT** "A" is a report providing an overview of the vacation rental work group and outlining their recommendations.

#### **FISCAL IMPACT**:

None.

#### **REVIEWED BY:**

Department Director:	Veronica Goedhart
Interim City Manager:	Teresa Gallavan

#### ATTACHMENTS:

A. Vacation Rental Work Group Overview and Recommendations

# 2022

# Department of Special Program Compliance Vacation Rental and Homeshare Work Group



The Department of Special Program Compliance

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### Summary

At the March 29, 2022, Council Study Session, City staff presented to City Council a comprehensive report on the State of Vacation Rentals. The report included data compiled by staff at the request of City Council.

#### The report included:

#### Maps

- Printed, detailed, with visual representation of vacation rental numbers and saturation
- Breakdown by neighborhood or council district
- Density/impact of short-term vacation rentals (STVR)

#### Permits

- Growth by year and by neighborhoods
- What percentage of housing are used for STVR
- Breakdown of permits held by single family residences (SFR), Condos, Estate properties
- Total permits processed by month
- Track and report original and renewal permit dates
- Information that would track trends are new permits similar or different than older ones

#### **Contract Summaries**

- Average number of contracts (agency and individual)
- Average length of stay

#### TOT

- History of STVR TOT
- STVR TOT by month and year
- How is STVR TOT utilized

#### Citations

- Breakdown by neighborhood and type
- Breakdown by year/month
- Percentage of complaints that result in citations
- Total number of suspensions and properties deemed permanently ineligible to operate

#### Hotline

- Complaints Nuisance vs non-nuisance
- Complaints Registered STVR vs non-STVR

Following a presentation by staff, Council discussed the current state of vacation rentals and staff subsequently created a work group to review additional data and draft recommendations to allow policy choices.

### Vacation Rental Work Group - Overview

On July 6, 2022, the City of Palm Springs released a press release and utilizing the City's social media platforms announced the recruitment of working group members to participate in a rounded discussion and generate balanced recommendations on vacation rental policies. The group consists of 11 volunteers. Members included real estate professionals, vacation rental industry stakeholders, ONE-PS members, and community members. A total of three members were selected and the remaining eight members were randomly selected. A total of 124 applications were received.

Members volunteered to assist with discussion items around the Vacation Rental Ordinance and provide recommendation for future policy considerations. The work group mission is to:

- Provide input on items regarding
  - Vacation Rental density
  - Vacation Rentals as an ancillary or secondary use of one's property
  - Impacts towards housing supply
- Encourage public participation from the community
- Create consensus and provide recommendations

Work group members were advised of required time commitment, Rules of Engagement and Ground rules for an effective and respectful communication and decision making<sup>1</sup>, Attachment "A".

Participants included:

#### **Michael Flannery**

I Moved to Palm Springs in 2002, after 12 years in Silicon Valley in Tech Sales & Marketing. I found a new home; I love Palm Springs. Upon arrival, I began flipping homes, eventually became a general contractor, founding Solterra Builders. Solterra went on to be become synonymous with Mid Century revitalization projects, as well as one of the largest residential for hire builder in the Valley from 2007 to 2013. In 2009, I founded Acme House Company, with the idea that responsible vacation rental management was needed and marketable. By 2013 I downsized the construction & development, focusing all my time on Acme which had grown to over 100 homes under management. Today we manage 170 luxury properties valley wide, employing a team of over 50, providing an average salary of \$70,000. I was instrumental in working with the city for ordinance changes during 2016/17, while President of the industry group Vacation Rental Tourism Association, which I helped roll into VRON in 2018. I now hold a board seat on VRON. I am also a board member of Palm Springs Hospitality Association. In 2019 I renovated the old B of A building at 750 N Palm Canyon Dr. into a mixed thriving project called the Flannery Exchange. At the Flannery Exchange, we run an events business on the rooftop deck, offer co working, daily office rentals, conference rooms and business events space, and office leases, as well as being home to 5 retailers and restaurants. With my wife, we own Cafe La Jefa and Bar Chingona in the Flannery Exchange.

<sup>&</sup>lt;sup>1</sup> City of Palm Springs Rules of Engagement and Ground Rules for Communication and Decision Making, Attachment "A".

#### Jim Gazan

Homeowner; Resident. Jim Gazan has lived as a full-time resident in palm springs for twelve years. In that time, he has volunteered and held positions in marquee events such as the Palm Springs International Film Festival, Modernism Week and held positions on his neighborhood board, OnePS and the Measure J Commission.

Jim feels strongly in moderation as it relates to the Short-Term Rental Industry. Now that Palm Springs is one of the remaining cities in the Valley to permit STR's it is critical to put a limit on rentals before the industry takes over neighborhoods.

Jim has been impacted positively and negatively from neighboring STR's, and lives in a neighborhood with one of the highest concentrations of rentals. He knows first had the loss of community that rental saturation can have on a neighborhood.

#### **Bruce Hoban**

Homeowner, Resident, President, Co-Founder and Board of Directors of VRON-PS, On the Board of Directors for Palm Springs Hospitality Association, Palm Springs Resorts, and Plaza Theater Foundation

#### **Bruce Juenger**

Bruce Juenger lives in the Miralon development and is on the Board of Directors for the Miralon Community Corporation (Homeowners Association). His background is in Real Estate Asset Management. He has resided in Palm Springs either full or part time since 1990.

#### Jeffrey Mauk

A San Francisco California resident for 30 years before moving to the Palm Springs Escena community in 2019 with my husband of 25 years. I am a member of the Escena Neighborhood Organization, and current Vice Chairperson, under the One-PS community group. A graduate of the Mayo Clinic School of Physical Therapy, I am now a semi-retired Physical Therapist. I have a 5 decade-long career in health care management, electronic medical record content development and direct patient care. Spanning across MN, OH, TX and CA. Including 23 years practicing as a community home health Physical Therapist in San Francisco. With a strong focus on home safety assessments for homebound clients and their unique living environments. I have owned homes when living in San Francisco and now Palm Springs, both cities with strong tourism-driven economies. And thus have a strong interest in the city's need for managing the seasonal tourism economy, while at the same time, respecting and sustaining the quality of life for all permanent residents who exist here year-round.

#### **Shannon Metcalf**

Shannon Metcalf is the owner of a boutique Co-hosting & Concierge business, Host with the Most since the end of 2016 and is a full time Palm Springs resident. Shannon has served on the Board of Directors of Ocotillo Lodge HOA and Twin Palms Neighborhood Organization, is a member of VRON and has been a volunteer for Modernism Week events since 2014.

#### James O'Keefe

Homeowner, Resident, Works in Realty.

#### **Hank Plante**

Hank Plante is a TV and print journalist who spent three decades reporting on California issues for the CBS TV stations in San Francisco and Los Angeles. Hank's work has received several honors, including six Emmy Awards and broadcasting's highest honor, the George Foster Peabody Award. Hank and his husband have been Palm Springs homeowners for more than 20 years.

#### **Gregory Roberts**

After living in many cities around the country, there is no doubt that Palm Springs is home. The life blood of our city is its residents, businesses, tourists, public services, and resident volunteers. I am committed to the betterment of Palm Springs, so I volunteer and serve on a City Commission and on my neighborhood HOA. I am proud to be a member of the Vacation Rental & Homeshare Workgroup. Visitors and tourists are key drivers of our economy, and it is crucial that we understand and balance our hospitality with the peaceful enjoyment of our neighborhoods and residents. As a part of this Workgroup, I will do my best to make sure that all the stakeholders are heard, and I will do my best to influence and formulate recommendations to the City Council that serve the greater good in keeping Palm Springs the vibrant and robust city that it is and can be.

#### **Chris Ruetz**

Six-year resident of Palm Springs who decided to rent his primary home for ancillary income due to the onset of the Covid pandemic. Now operates a boutique property concierge service for vacation rentals, along with serving on various boards. (VRON, OnePS, and the Movie Colony East NOrg as President)

#### Joe Wild

I am an 18-year full time resident of Palm Springs. The advent of STVRs has drastically changed the landscape of housing opportunities in our village. Single family homes are too expensive for typical families with children. Our "snowbird" population finds it difficult to locate affordable seasonal housing. And, most importantly, we can do something about it. That is why I am volunteering my time to serve on the task force.

The work group was facilitated by Interim City Manager, Teresa Gallavan; Director of Special Programs, Veronica Goedhart; and, Executive Program Manager, Patrick Clifford.

### Workgroup Sessions and Recommendations

Work group sessions were held to elicit feedback and recommendations. Recommendations were made utilizing the rule of majority consensus.

#### **VACATION RENTAL DENSITY**

What started as general discussion quickly morphed into very specific data mining as members asked to learn more details on vacation rental properties. Some important topics rose to the surface that specifically had the potential to be addressed in the Vacation Rental Ordinance when reviewed and updated.

In researching the effects of vacation rentals on the community, multiple conflicting issues come into play. How land-use policy comes up against the need for revenue. How property rights square up with neighbor's rights. How a lucrative hospitality industry, when introduced into a neighborhood of family homes, can potentially impact the quality of life for those who live there year-round. This seems true especially when vacation rentals are not managed in accordance with the rules and regulations as set forth in the City's ordinance.

The quality-of-life issues mentioned above seemed to be primarily focused on noise and parking issues. Aside from the household that does not like strangers in their neighborhoods, those are the top two complaints. The City's strict rules and enforcement has assisted in mitigating these issues for many neighborhoods.

The other issue that looms large not just in our region, but across the globe, is how any increase in vacation rentals invariably removes housing stock from a community. That in turn can be a factor in driving up housing prices and drive out working-class people. Affordable housing is a big issue for Palm Springs.

The inaugural meeting on July 19, 2022, focused primarily on data sources and statistics for vacation rental properties in the City. Local data compiled by City staff was presented to the workgroup for their review and comment. The group unanimously determined that a vacation rental cap was needed; however, requested additional information prior to discussing numbers.

At the August 9, 2022, meeting, the group received additional data regarding updated Vacation Rentals numbers in neighborhoods, an accepted number of households in Palm Springs based on the Housing Element Study, growth of Vacation Rental Applications, condominium data, and statistics on hotels, **Attachment "B"**<sup>2</sup>.

On August 9, 2022, after review and discussion, the group voted on a city-wide vacation rental permit cap of 2,500³. Four (4) members voted in favor, two (2) members voted for a lower number and four (4)

<sup>&</sup>lt;sup>2</sup> Attachment "B" includes multiple data points. Vacation Rentals by organized neighborhood is as of July 28, 2022. Household unit count was sourced from the City of Palm Springs Housing Element Study. Vacation Rental application growth and condominium data was sourced from the Department of Special Program Compliance. Statistics on hotels was sourced from a 2019 Desert Sun Report and Visit Greater Palm Springs

<sup>&</sup>lt;sup>3</sup> The current number of vacation rental permits is 2,477 with 200 pending new applications. The group recognizes that the cap will be exceeded upon adoption of the revised Ordinance.

voted for a higher cap number (One (1) member was absent). The group recommends that all submitted applications would be processed as well as properties that closed escrow within 30 days of the adoption of the ordinance.

At the August 16, 2022, meeting the group requested a second vote on a city-wide cap of 2,500 based on the additional data presented, this vote resulted in 9 members in favor and 1 member abstaining (1 member was absent).

The group also addressed the over-saturation of vacation rentals in specific neighborhoods throughout the City. The group specifically addressed concerns relating to the question, is there a maximum percentage of vacation rental properties in a "neighborhood" that neighbors can still feel they are in a residential community as opposed to a commercial district. The group discussed various methods to address neighborhood saturation, including a neighborhood percentage cap based on housing stock, district percentage cap based on housing stock, and mandatory separation distances between rentals.

Additional information was requested by the group, including a map with vacation rentals by council member district<sup>4</sup>, **Attachment "C".** The discussion proved to be the most challenging for the group with the discussion tabled pending additional data and information. On August 30, 2022, the group reached a majority consensus, without a vote, to include a neighborhood density percentage. The group determined that a percentage cap by district would not address the immediate problem of neighborhood saturation and opted to vote on a percentage cap to be implemented for every identified neighborhood.

The percentages presented to the group for discussion ranged from 6% to 20%. Two votes were conducted, the first for a neighborhood cap of 10% with 6 members voting in favor and 3 against; the second vote was for a 20% neighborhood cap, with 3 members voting in favor and 6 against. (Two members were not present to vote).

#### **Work Group Recommendation**

Based on majority consensus, the group recommends a 2,500 city-wide vacation rental permit cap. Additionally, a 10% neighborhood density cap within the 2,500 permit limitations was recommended.

#### VACATION RENTALS AS AN ANCILLARY USE OR SECONDARY USE

The group reviewed the data presented, such as, Ordinance 1918 – 5.25.020 Findings, Vacation Rental Contract Summary Data from the March 29, 2022, study session, Ordinance 1918 restrictions with conditions, covenants, or restrictions, and discussed topics regarding annual contract limits per Vacation Rental, minimum night stays, and owner occupancy requirements. The group was presented by a work group member, Judge Chad Firetag's *Protect Our Neighborhoods v. City of Palm Springs, et al.,* Decision<sup>5</sup> in which the Court of Appeal affirmed a trial court's finding that the City of Palm Springs' short-term rental ordinances were consistent with the City's Zoning Code, **Attachment "D"**. The section provided specifically addressed the ordinance language of ancillary and secondary use of homes. It was

<sup>&</sup>lt;sup>4</sup> District data was provided utilizing the cities GIS system, Attachment "C"

<sup>&</sup>lt;sup>5</sup> Work group member Bruce Hoban presented to the group a page of California Fourth District Court of Appeals, Honorable Chad Firetag's Opinion, **Attachment "D"**.

represented by the work group member that the ruling determined that the issue of secondary and ancillary use has withstood judicial litigation and therefore a moot issue<sup>6</sup>. There was minimal discussion occurring prior to the determination to not make a recommendation for changes to the current ordinance.

Specific concerns addressed by the group included limitations on how the city could enforce an owner occupancy requirement. The group agreed that that the limitation on contracts annually encourages a minimum night stay and ancillary use as owners are unable to rent a property more than a maximum 36 times a year.

#### Work Group Recommendation:

Based on majority consensus the group recommended no changes to the present language in Ordinance 1918 regarding secondary and ancillary use.

#### **IMPACTS ON HOUSING SUPPLY**

The rise and growth of vacation rental platforms such as Airbnb, HomeAway and Flipkey has created plenty of debate amongst local governments, the hotel industry, the real estate lobby, housing activists and residents about the impact of such rentals on the availability of long-term rental housing. Given that the vacation rental industry continues to grow, people are concerned about the industry's impact on the affordability and availability of long-term rental housing.

The group reviewed a variety of data sources and articles<sup>7</sup> from both staff and group members on this subject. Articles were presented on both sides of the argument of the impact of vacation rentals on housing. The group discussed the need for affordable housing stock in the City citing those new developments in the City are simply not affordable for the working class. The group agreed that vacation rental homes should continue to be an ancillary and secondary use with continued enforcement against corporate investment vacation rental properties; however, no specific recommendation was reached on this. As stated best by one group member, "All opinions could be supported if you look hard enough".

The articles and references reviewed on impacts of the housing supply are listed below:

From Forbes: "The Airbnb Effect on Housing & Rent"
 https://www.forbes.com/sites/garybarker/2020/02/21/the-airbnb-effect-on-housing-and-rent/?sh=7b99799e2226

<sup>&</sup>lt;sup>6</sup> This represents information directly related to the Palm Springs Ordinance language; however, there are other legal opinions in other municipalities and States with differentiating opinions.

<sup>&</sup>lt;sup>7</sup> Articles and reports reference in discussion: *The Effect of Homes-Sharing on House Prices and Rents: Evidence from Airbnb, (2019)* Barron, Kung, Proserpio; *The economic costs and benefits of Airbnb, (2019)* Economic Policy Institute, Bivens; *Staying Power: The Effects of Short-Term Rentals on California's Tourism, Economy and Housing Affordability (2022)*, Milken Institute, Dubetz, Horton, Kesteven; *The Airbnb Effect on Housing & Rent (2020)* Forbes.com; *Research: When Airbnb Listings in a City Increase, So Do Rent Prices (2019)*, Barron, Kung, and Proserpio.

- From the Economic Policy Institute (a non-partisan think tank):

  <a href="https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-no-reason-for-local-policymakers-to-let-airbnb-bypass-tax-or-regulatory-obligations/">https://www.epi.org/publication/the-economic-costs-and-benefits-of-airbnb-no-reason-for-local-policymakers-to-let-airbnb-bypass-tax-or-regulatory-obligations/</a>
- From the Harvard Business Review https://hbr.org/2019/04/research-when-airbnb-listings-in-a-city-increase-so-do-rent-prices
- From the Milken Institute

  https://milkeninstitute.org/report/short-term-rentals-california-tourism-housing

#### **Work Group Recommendation:**

Based on majority consensus the group recommends a 2,500 city-wide vacation rental permit cap and a 10% neighborhood cap.

#### Additional Concerns

During work group discussions, several issues were raised by the group, which had not been directed by the City Council to be looked at. A summary is provided below:

- Ancillary and Secondary Use: While no recommendation was made, the concern regarding owners who use their vacation rental properties as investment properties is inconsistent with the findings of the Ordinance.
- Impacts on Housing Supply: The group discussed the shortage of affordable housing in Palm Springs. While no recommendation was made, the sentiment of primary concern is availability for affordable housing, the solution should start with the construction of more affordable housing, such as multi-family housing.
- American with Disabilities Act ("ADA"): Some members of the working group asked whether vacation rental properties are required to be ADA compliant. Based on a review of the applicable ADA regulations, it appears that a short-term rental of a single-family residence is not required to be ADA compliant if it does not contain more than five rooms for rent and is occupied by the owner of the establishment as his/her residence. If the short-term rental is not owner-occupied or there are more than five rooms, the analysis must be applied to determine if the short-term rental would be considered a place of lodging subject to the ADA. However, regardless of whether residential property owners are, or are not, required to make their properties ADA compliant, the City's current regulatory approach does not impose any legal requirements or liability on the City. If the City Council would like to investigate this issue further, the Council can instruct the City Attorney to conduct further research into the matter.
- Loss of Community: During the discussion, a working group member presented a pinhead map
  demonstrating the number of second homes in Palm Springs that are not permitted vacation
  rentals. As explained by the group member, the intent of the introduction of the map was
  demonstrate that the number of second homes vary greatly by neighborhood, with some
  neighborhoods having a large number that may contribute to the "loss of community".
   ATTACHMENT "E"8.

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<sup>&</sup>lt;sup>8</sup> Work group member Bruce Hoban presented to the group a map prepared by National Demographics Board, prepared at the request of Vacation Rentals Owners and Neighbors Palm Springs. The map demonstrates second homes in Palm Springs that are not permitted as vacation rentals. Permitted vacation rentals are a subset of the consensus defined "vacant" second homes.

# Attachment "A"

#### **RULES OF ENGAGEMENT**

- Each workgroup will have a facilitator.
- Each workgroup member should attend all meetings for the entire term of the workgroup.

The workgroups will adhere to the agreed upon timeline and produce work products in a timely fashion.

Participants will agree to ground rules to facilitate the quality of the communication, including:

#### Ground rules for an effective and respectful communication

- Only one person may speak at a time.
- Resist defending positions; rather look for common ground and areas of agreement.
- Agree on what important words mean.
- When speaking explain the reasons behind your statements and ask for feedback from the group.
- Speak to be understood, not to win.
- Ask questions to understand the rationale and data behind the position of others.
- Test your assumptions and inferences by asking questions.
- Don't assume motives behind the statement of others. Assume positive intent.
- Be sensitive to differences in perspectives.
- Avoid debating issues (discussion, not debate) and assigning blame.
- Do not interrupt others or monopolize the communication. Raise your hand to speak and the facilitator will keep a list with the order (all members are expected to participate with their perspective).
- Avoid personal attacks, cheap shots or loaded questions. Use open-ended questions.
- Keep discussion focused.
- Keep the focus on agenda items.
- When speaking be brief and to the point (try to give examples). Attend all meetings.
- Be on time for meeting.

#### **Ground rules for decision-making**

The Working Group will use the procedure of Consensus with Qualification to make decisions. Here consensus does not mean 100 percent agreement on everything by all participants, it means that each individual is able to accept a proposal or idea of the majority of participants and are willing to completely accept a proposal or idea. It also means is that all concerns have been addressed and everyone has been heard and understood. Thus, consensus can be defined as a state of mutual agreement among members of a group where all legitimate concerns of participants have been addressed to the satisfaction of the group. Consensus with qualification works like this:

An agenda is developed in advance containing three types of topics:

- Reports (recent events of work)
- Open Discussion (problem solving and brainstorming)
- Proposals (for group decision)

Proposals are presented and clarified to the group. Participants grade the proposal as:

- Completely agree
- Can live with it
- Have legitimate concerns (possible consequences of the proposal that are contrary to the goals of the group)

Concerns are listed and addressed by the group. Changes can be introduced to the proposal.

If there isn't consensus, participants will clarify their objections while searching for areas of agreement. The goal is to reach consensus or a broad majority wherever is possible. However, staff reports given to the City Council will also outline the points of significant disagreement or alternatives as appropriate.

After each meeting staff will prepare a summary of the meeting, which will be made available to participants before the next meeting if at all possible.

#### **Roles**

Facilitators: Help participants and the group to follow ground rules, identify, clarify and reframe issues, test parties' assumptions / inferences, help resolve disputes, make presentations.

Participants: Actively participate in the discussion, follow the ground rules, work hard on the issues not the people, and provide feedback on reports and future agendas.

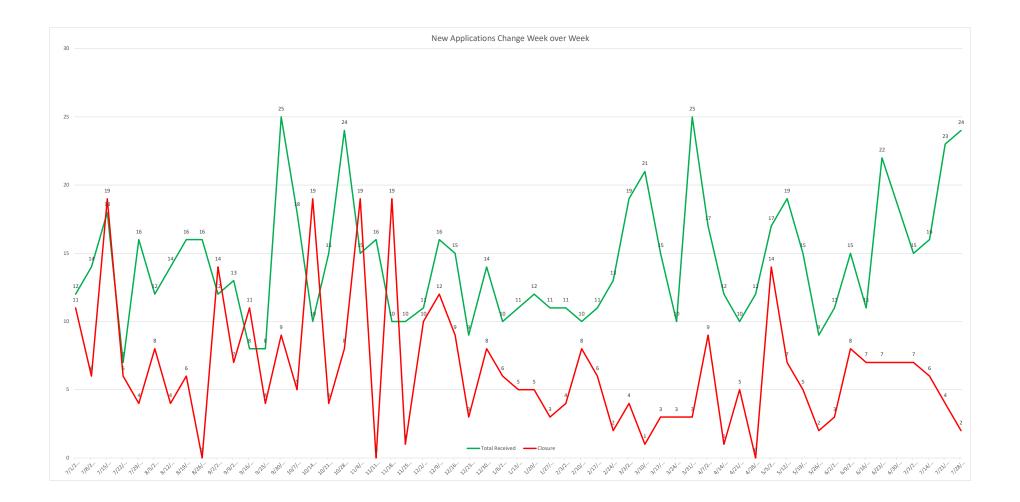
# Attachment "B"

## Vacation Rental Neighborhood Information

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Neighborhood	Household	7.28.22 VR Count	%VR to HH	3%	sla ik <b>5%</b>	6%	7%	Blan Over/Un	8%	9%	10%	15%	20%
Racquet Club Estates	540		38.52	16.2	27	32.4	37.8	-170.2	43.2	48.6	54	81	108
Sunmor	142		28.17	4.26	7.1	8.52	9.94	-30.06	11.36	12.78	14.2	21.3	28.4
Twin Palms	329		27.36	9.87	16.45	19.74	23.03	-66.97	26.32	29.61	32.9	49.35	65.8
El Rancho Vista Estates	114		27.19	3.42	5.7	6.84	7.98	-23.02	9.12	10.26	11.4	17.1	22.8
	114		23.42	4.74	7.9	9.48	11.06	-25.94	12.64	14.22	15.8	23.7	31.0
El Mirador	465		21.94	13.95	23.25	27.9	32.55	-69.45	37.2	41.85	46.5	69.75	93
Desert Park Estates  Movie Colony East	773		21.94			46.38	54.11	-111.89	61.84	69.57	77.3	115.95	154.0
Tahquitz River Estates	613		20.55	23.19 18.39	38.65 30.65	36.78	42.91	-83.09	49.04	55.17	61.3	91.95	122.6
<u>'</u>	360		17.78	10.8	18	21.6	25.2	-38.8	28.8	32.4	36	91.95	72
Ranch Club Estates		108	17.76	18.24	30.4	36.48	42.56	-65.44	48.64	54.72	60.8	91.2	121.0
Gene Autry Sunrise Park	705		17.76	21.15	35.25	42.3	49.35	-75.65	56.4	63.45	70.5	105.75	121.0
			17.73			11.94							
The Movie Colony	199			5.97	9.95		13.93	-20.07	15.92	17.91	19.9	29.85	39.8
Vista Las Palmas	419		16.47	12.57	20.95	25.14	29.33	-39.67	33.52	37.71	41.9	62.85	83.8
Demuth Park	683		14.79	20.49	34.15	40.98	47.81	-53.19	54.64	61.47	68.3	102.45	136.6
Deepwell Estates	451		14.63	13.53	22.55	27.06	31.57	-34.43	36.08	40.59	45.1	67.65	90.2
Little Beverly Hills	178		14.04	5.34	8.9	10.68	12.46	-12.54	14.24	16.02	17.8	26.7	35.6
Lawrence Crossley	79		13.92	2.37	3.95	4.74	5.53	-5.47	6.32	7.11	7.9	11.85	15.8
Vista Norte	1069		13.38	32.07	53.45	64.14	74.83	-68.17	85.52	96.21	106.9	160.35	213.8
The Mesa	277	37	13.36	8.31	13.85	16.62	19.39	-17.61	22.16	24.93	27.7	41.55	55.4
Indian Canyons	452		11.73	13.56	22.6	27.12	31.64	-21.36	36.16	40.68	45.2	67.8	90.4
Racquet Club West	858		11.31	25.74	42.9	51.48	60.06	-36.94	68.64	77.22	85.8	128.7	171.6
Warm Sands	479		10.44	14.37	23.95	28.74	33.53	-16.47	38.32	43.11	47.9	71.85	95.8
Oasis del Sol	562		9.96	16.86	28.1	33.72	39.34	-16.66	44.96	50.58	56.2	84.3	112.4
Little Tuscany	690		9.86	20.7	34.5	41.4	48.3	-19.7	55.2	62.1	69	103.5	138
Old Las Palmas	408		9.31	12.24	20.4	24.48	28.56	-9.44	32.64	36.72	40.8	61.2	81.6
Los Compadres	516	44	8.53	15.48	25.8	30.96	36.12	-7.88	41.28	46.44	51.6	77.4	103.2
Araby Cove	109	7	6.42	3.27	5.45	6.54	7.63	0.63	8.72	9.81	10.9	16.35	21.8
Tahquitz Creek Golf	1150		6.17	34.5	57.5	69	80.5	9.5	92	103.5	115	172.5	230
Sonora Sunrise	1678		5.07	50.34	83.9	100.68	117.46	32.46	134.24	151.02	167.8	251.7	335.6
Midtown	1036		4.92	31.08	51.8	62.16	72.52	21.52	82.88	93.24	103.6	155.4	207.2
Upper Westside	1247		4.41	37.41	62.35	74.82	87.29	32.29	99.76	112.23	124.7	187.05	249.4
Historic Tennis Club	518		3.09	15.54	25.9	31.08	36.26	20.26	41.44	46.62	51.8	77.7	103.6
Araby Commons	732		2.60	21.96	36.6	43.92	51.24	32.24	58.56	65.88	73.2	109.8	146.4
Andreas Hills	753	19	2.52	22.59	37.65	45.18	52.71	33.71	60.24	67.77	75.3	112.95	150.6
Whitewater Club	211	5	2.37	6.33	10.55	12.66	14.77	9.77	16.88	18.99	21.1	31.65	42.2
Desert Highland/Gateway	480		2.29	14.4	24	28.8	33.6	22.6	38.4	43.2	48	72	96
Baristo	1147	25	2.18	34.41	57.35	68.82	80.29	55.29	91.76	103.23	114.7	172.05	229.4
Rogers Ranch	431	9	2.09	12.93	21.55	25.86	30.17	21.17	34.48	38.79	43.1	64.65	86.2
Canyon Palms	445	7	1.57	13.35	22.25	26.7	31.15	24.15	35.6	40.05	44.5	66.75	89
Melody Ranch	826		1.21	24.78	41.3	49.56	57.82	47.82	66.08	74.34	82.6	123.9	165.2
Canyon Corridor	1063		0.94	31.89	53.15	63.78	74.41	64.41	85.04	95.67	106.3	159.45	212.6
N/A	8709	55	0.63	261.27	435.45	522.54	609.63	554.63	696.72	783.81	870.9	1306.35	1741.8
Gateway	584	1	0.17	17.52	29.2	35.04	40.88	39.88	46.72	52.56	58.4	87.6	116.8
Four Seasons	538		0.00	16.14	26.9	32.28	37.66	37.66	43.04	48.42	53.8	80.7	107.6
Escena	587		0.00	17.61	29.35	35.22	41.09	41.09	46.96	52.83	58.7	88.05	117.4
West Gate PS	319		0.00	9.57	15.95	19.14	22.33	22.33	25.52	28.71	31.9	47.85	63.8
Rimrock	61	-	0.00	1.83	3.05	3.66	4.27	4.27	4.88	5.49	6.1	9.15	12.2
Mountain Gate	509	0	0.00	15.27	25.45	30.54	35.63	35.63	40.72	45.81	50.9	76.35	101.8
Palm Springs Villa II	461	0	0.00	13.83	23.05	27.66	32.27	32.27	36.88	41.49	46.1	69.15	92.2
Total	35721	2445	0.07	1071.63	1786.05	2143.26	2500.47		2857.68	3214.89	3572.1	5358.15	7144.2
Single Family	22,210			666.3	1110.5	1332.6	1554.7		1776.8	1998.9	2221	3331.5	4442

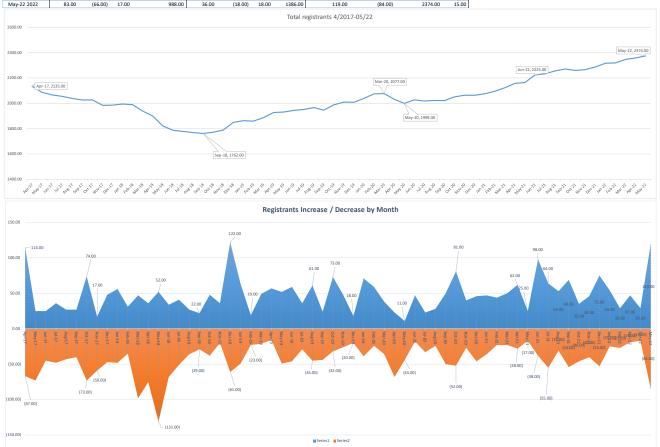
# Vacation Rental Neighborhood Information

Neighborhood	Household	Dec 2017 VR Count	Dec 2018 VR Count	Dec 2019 VR Count	Dec 2020 VR Count	2021 VR Count	2.1.22 VR Count 7.28.22 VR Count	Sparkline	Total Unit Change	% Change	%VR to HH
Gene Autry	608	45	54	63	66	91	93 108		63	140.00	17.76
Demuth Park	683	38	47	61	66	91	89 101		63	165.79	14.79
Vista Norte	1069	81	81	99		120			62	76,54	13.38
Desert Park Estates	465	44	52	68		93			58	131.82	21.94
Racquet Club Estates	540	153	155	174	180	189	198 208		55	35.95	38.52
Ranch Club Estates	360	32	37	48		63			32	100.00	17.78
Sunrise Park	705	96	102	101	112	119			29	30.21	17.73
Movie Colony East	773	139	137	143	138	161	149 166		27	19.42	21.47
Upper Westside	1247	32	28	30	32	46			23	71.88	4.41
Racquet Club West	858	74	87	101	92	98			23	31.08	11.31
Tahquitz Creek Golf	1150	51	42	47	47	60		-	20	39.22	6.17
Tahquitz River Estates	613	106	102	119	113	126	128 126		20	18.87	20.55
Little Tuscany	690	51	48	48		60	l l		17	33.33	9.86
Twin Palms	329	73	75	83		90			17	23,29	27.36
El Mirador	158	23	22	27		33			14	60.87	23.42
Oasis del Sol	562	42	40	43		52			14	33.33	9.96
Desert Highland/Gateway	480	1	1	1	3	9	10 11		10	1000.00	2.29
Deepwell Estates	451	57	51	58		64	-		9	15.79	14.63
Lawrence Crossley	79	2	2	4	8	9	10 11		9	450.00	13.92
The Mesa	277	30	35	34	33	34			7	23.33	13.36
Andreas Hills	753	12	13	16		17			7	58.33	2.52
Little Beverly Hills	178	18	18	23		24			7	38.89	14.04
El Rancho Vista Estates	114	25	24	28		26			6	24.00	27.19
Melody Ranch	826	4	4	4	7	10			6	150.00	1.21
Sonora Sunrise	1678	80	56	68	65	76	l l		5	6.25	5.07
Araby Commons	732	14	14	15		14			5	35.71	2.60
Sunmor	142	35	37	40		40			5	14.29	28.17
The Movie Colony	199	30	31	30		33			4	13.33	17.09
Warm Sands	479	48	45	46		43			2	4.17	10.44
Los Compadres	516	42	28	32		38			2	4.76	8.53
Canyon Palms	445	6	7	7	6	5	5 7		1	16.67	1.57
Rogers Ranch	431	8	6	4	6	7	7 9		1	12.50	2.09
Araby Cove	109	6	6	15	7	7	7 7		1	16.67	6.42
Four Seasons	538	0	0	0	0	0	0 0		0	0.00	0.00
Escena	587	0	0	1	0	0	0 0		0	0.00	0.00
Gateway	584	1	1	1	1	1	1 1	<del>                                     </del>	0	0.00	0.17
Whitewater Club	211	5	3	2	2	4	5 5		0	0.00	2.37
Canyon Corridor	1063	10	6	7	10	9	11 10		0	0.00	0.94
West Gate PS	319	1	0	0	0	0	0 0		-1	-100.00	0.00
Rimrock	61	1	0	0	0	0	0 0	· · · · · · · · · · · · · · · · · · ·	-1	-100.00	0.00
Vista Las Palmas	419	70	73	77		71			-1	-1.43	16.47
Mountain Gate	509	2	1	0	0	0	00		-2	-100.00	0.00
Old Las Palmas	408	41	39	41	53	37			-3	-7.32	9.31
Indian Canyons	452	56	56	57	57	56			-3	-5.36	11.73
Midtown	1036	57	50	52		49	l l	\	-6	-10.53	4.92
Baristo	1147	31	24	25		24			-6	-19.35	2.18
Historic Tennis Club	518	25	24	22		18			-9	-36.00	3.09
N/A	7782	71	49	38		51			-16	-22.54	0.71
Palm Springs Villa II	461	19	1	1	0	0	0 0		-19	-100.00	0.00
Total	34794	1888	1814	2004	2026	2268			13	200.00	3.50
	10	1000	1014	2004	2020	2208	2230 2773	ı	1		



#### **Vacation Rental Application Information**

			Agency			Individu	ıal			Total		
lonth Year	Activty + A	ctivity -	Net A	gency Registrants	Activity + Ac	tivity -2	Vet3 I	ndividual	Total Activity + Total	Activity - Total	Registrants C	hange
Apr-17 2017	44.00	(42.00)	2.00	1011.00	70.00	(25.00)	45.00	1124.00	114.00	(67.00)	2135.00	
May-17 2017	11.00	(50.00)	(39.00)	972.00	14.00	(23.00)	(9.00)	1115.00	25.00	(73.00)	2087.00	(48.00
Jun-17 2017	4.00	(7.00)	(3.00)	969.00	21.00	(38.00)	(17.00)	1098.00	25.00	(45.00)	2067.00	(20.00
Jul-17 2017	32.00	(19.00)	13.00	982.00	4.00	(29.00)	(25.00)	1073.00	36.00	(48.00)	2055.00	(12.00
Aug-17 2017	14.00	(18.00)	(4.00)	978.00	13.00	(25.00)	(12.00)	1061.00	27.00	(43.00)	2039.00	(16.00
Sep-17 2017	5.00	(8.00)	(3.00)	975.00	22.00	(32.00)	(10.00)	1051.00	27.00	(40.00)	2026.00	(13.0
Oct-17 2017	24.00	(33.00)	(9.00)	966.00	50.00	(40.00)	10.00	1061.00	74.00	(73.00)	2027.00	1.0
Nov-17 2017	4.00	(17.00)	(13.00)	953.00	13.00	(42.00)	(29.00)	1032.00	17.00	(59.00)	1985.00	(42.0
Dec-17 2017	32.00	(30.00)	2.00	955.00	16.00	(17.00)	(1.00)	1031.00	48.00	(47.00)	1986.00	1.0
Jan-18 2018	19.00	(26.00)	(7.00)	948.00	37.00	(22.00)	15.00	1046.00	56.00	(48.00)	1994.00	8.0
Feb-18 2018	5.00	(14.00)	(9.00)	939.00	26.00	(21.00)	5.00	1051.00	31.00	(35.00)	1990.00	(4.0
Mar-18 2018	28.00	(54.00)	(26.00)	913.00	19.00	(44.00)	(25.00)	1026.00	47.00	(98.00)	1939.00	(51.0
Apr-18 2018	21.00	(53.00)	(32.00)	881.00	15.00	(22.00)	(7.00)	1019.00	36.00	(75.00)	1900.00	(39.0
May-18 2018	28.00	(72.00)	(44.00)	837.00	24.00	(59.00)	(35.00)	984.00	52.00	(131.00)	1821.00	(79.0
Jun-18 2018	17.00	(42.00)	(25.00)	812.00	17.00	(26.00)	(9.00)	975.00	34.00	(68.00)	1787.00	(34.0
Jul-18 2018	21.00	(32.00)	(11.00)	802.00	20.00	(19.00)	1.00	976.00	41.00	(51.00)	1778.00	(9.0
Aug-18 2018	9.00	(20.00)	(11.00)	791.00	18.00	(16.00)	2.00	978.00	27.00	(36.00)	1769.00	(9.0
Sep-18 2018	11.00	(8.00)	3.00	794.00	11.00	(21.00)	(10.00)	968.00	22.00	(29.00)	1762.00	(7.0
Oct-18 2018	26.00	(16.00)	10.00	804.00	22.00	(22.00)	0.00	968.00	48.00	(38.00)	1772.00	10.0
Nov-18 2018	25.00	(5.00)	20.00	824.00	11.00	(15.00)	(4.00)	964.00	36.00	(20.00)	1788.00	16.0
Dec-18 2018	60.00	(35.00)	25.00	849.00	62.00	(26.00)	36.00	1000.00	122.00	(61.00)	1849.00	61.0
Jan-19 2019	33.00	(21.00)	12.00	849.00 861.00	30.00	(28.00)	2.00	1000.00	63.00	(49.00)	1849.00	14.0
Feb-19 2019	10.00	(12.00)	(2.00)	859.00	9.00	(11.00)	(2.00)	1002.00	19.00	(23.00)	1859.00	(4.0
Mar-19 2019	21.00	(13.00)	8.00	867.00	28.00	(8.00)	20.00	1020.00	49.00	(21.00)	1887.00	28.0
Apr-19 2019	20.00	(12.00)	8.00	875.00	37.00	(4.00)	33.00	1053.00	57.00	(16.00)	1928.00	41.0
May-19 2019	19.00	(34.00)	(15.00)	860.00	33.00	(15.00)	18.00	1071.00	52.00	(49.00)	1931.00	3.0
Jun-19 2019	28.00	(29.00)	(1.00)	859.00	31.00	(17.00)	14.00	1085.00	59.00	(46.00)	1944.00	13.0
Jul-19 2019	18.00	(18.00)	0.00	859.00	18.00	(11.00)	7.00	1092.00	36.00	(29.00)	1951.00	7.0
Aug-19 2019	31.00	(24.00)	7.00	866.00	30.00	(21.00)	9.00	1101.00	61.00	(45.00)	1967.00	16.0
Sep-19 2019	18.00	(25.00)	(7.00)	859.00	6.00	(19.00)	(13.00)	1088.00	24.00	(44.00)	1947.00	(20.0
Oct-19 2019	42.00	(16.00)	26.00	885.00	31.00	(16.00)	15.00	1103.00	73.00	(32.00)	1988.00	41.0
Nov-19 2019	32.00	(16.00)	16.00	901.00	16.00	(10.00)	6.00	1109.00	48.00	(26.00)	2010.00	22.0
Dec-19 2019	10.00	(9.00)	1.00	902.00	8.00	(11.00)	(3.00)	1106.00	18.00	(20.00)	2008.00	(2.0
Jan-20 2020	36.00	(19.00)	17.00	919.00	35.00	(20.00)	15.00	1121.00	71.00	(39.00)	2040.00	32.0
Feb-20 2020	29.00	(11.00)	18.00	937.00	30.00	(13.00)	17.00	1138.00	59.00	(24.00)	2075.00	35.0
Mar-20 2020	20.00	(17.00)	3.00	940.00	18.00	(19.00)	(1.00)	1137.00	38.00	(36.00)	2077.00	2.0
Apr-20 2020	10.00	(34.00)	(24.00)	916.00	13.00	(34.00)	(21.00)	1116.00	23.00	(68.00)	2032.00	(45.0
May-20 2020	7.00	(20.00)	(13.00)	903.00	4.00	(24.00)	(20.00)	1096.00	11.00	(44.00)	1999.00	(33.0
Jun-20 2020	11.00	(13.00)	(2.00)	901.00	36.00	(5.00)	31.00	1127.00	47.00	(18.00)	2028.00	29.0
Jul-20 2020	2.00	(11.00)	(9.00)	892.00	21.00	(22.00)	(1.00)	1126.00	23.00	(33.00)	2018.00	(10.0
Aug-20 2020	18.00	(7.00)	11.00	903.00	10.00	(17.00)	(7.00)	1119.00	28.00	(24.00)	2022.00	4.0
Sep-20 2020	16.00	(23.00)	(7.00)	896.00	34.00	(27.00)	7.00	1126.00	50.00	(50.00)	2022.00	0.0
Oct-20 2020	34.00	(26.00)	8.00	904.00	47.00	(26.00)	21.00	1147.00	81.00	(52.00)	2051.00	29.0
Nov-20 2020	16.00	(15.00)	1.00	905.00	24.00	(12.00)	12.00	1159.00	40.00	(27.00)	2064.00	13.0
Dec-20 2020	15.00	(21.00)	(6.00)	899.00	31.00	(25.00)	6.00	1165.00	46.00	(46.00)	2064.00	0.0
Jan-21 2021	17.00	(19.00)	(2.00)	897.00	30.00	(17.00)	13.00	1178.00	47.00	(36.00)	2075.00	11.0
Feb-21 2021	15.00	(16.00)	(1.00)	896.00	29.00	(7.00)	22.00	1200.00	44.00	(23.00)	2096.00	21.0
Mar-21 2021	32.00	(10.00)	22.00	918.00	18.00	(13.00)	5.00	1205.00	50.00	(23.00)	2123.00	27.0
Apr-21 2021	24.00	(12.00)	12.00	930.00	38.00	(16.00)	22.00	1227.00	62.00	(28.00)	2157.00	34.0
May-21 2021	11.00	(7.00)	4.00	934.00	14.00	(10.00)	4.00	1231.00	25.00	(17.00)	2165.00	8.0
Jun-21 2021	49.00	(19.00)	30.00	964.00	49.00	(19.00)	30.00	1261.00	98.00	(38.00)	2225.00	60.0
Jul-21 2021	24.00	(20.00)	4.00	968.00	40.00	(35.00)	5.00	1266.00	64.00	(55.00)	2234.00	9.0
Aug-21 2021	31.00	(15.00)	16.00	984.00	22.00	(16.00)	6.00	1272.00	53.00	(31.00)	2256.00	22.0
Sep-21 2021	30.00	(23.00)	7.00	991.00	39.00	(31.00)	8.00	1280.00	69.00	(54.00)	2271.00	15.0
Oct-21 2021	16.00	(39.00)	(23.00)	968.00	19.00	(7.00)	12.00	1292.00	35.00	(46.00)	2260.00	(11.0
Nov-21 2021	22.00	(23.00)	(1.00)	967.00	24.00	(17.00)	7.00	1299.00	46.00	(40.00)	2266.00	6.0
Dec-21 2021	31.00	(34.00)	(3.00)	964.00	44.00	(19.00)	25.00	1324.00	75.00	(53.00)	2288.00	22.0
Jan-22 2022	24.00	(14.00)	10.00	974.00	30.00	(11.00)	19.00	1343.00	54.00	(25.00)	2317.00	29.0
Feb-22 2022	14.00	(15.00)	(1.00)	973.00	15.00	(12.00)	3.00	1346.00	29.00	(27.00)	2319.00	2.0
Mar-22 2022	21.00	(13.00)	8.00	981.00	26.00	(6.00)	20.00	1366.00	47.00	(19.00)	2347.00	28.0
Apr-22 2022	17.00	(7.00)	10.00	991.00	12.00	(10.00)	2.00	1368.00	29.00	(17.00)	2359.00	12.0
												15.0
May-22 2022	83.00	(66.00)	17.00	988.00	36.00	(18.00)	18.00	1386.00	119.00	(84.00)	2374.00	15.0



### Vacation Rental Condominium Information

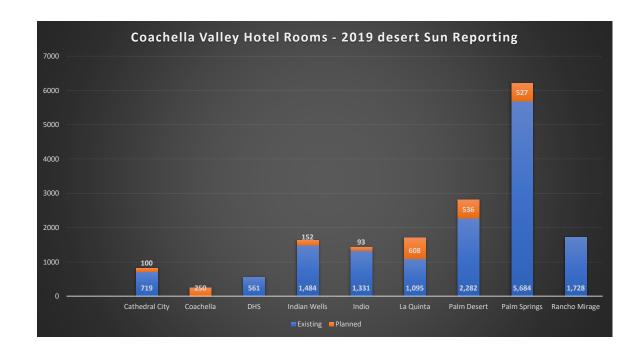
Status	Active
Property Type	(Multiple Items)

Count of HOA Mgmt Co	Column Labels				
Row Labels		1	2	3 4	Grand Total
247 W Stevens HOA		1	1		2
Club Condominiums		3	4	1	8
Coco Cabana		3	4	1	8
Colony Palms			1		1
Desert Seville HOA			1		1
Estados South		1	1	3	5
Little Tuscany Townhouse Two			1		1
Los Pueblos Association			6	4	10
Mesquite CC		9	64		73
Mountain Shadows			1	11 2	2 14
Oasis Villa			9		9
Oceo Master & Condo Assoc				1	1
Ocotillo Lodge		43		1	44
Palm 2150			2	2	4
Palm Canyon Villas		4	21	1	26
Palm Murray HOA			2		2
Palm Springs Biarritz		25			25
Palm Springs Biltmore		1	1		2
Palm Springs Country Club			1		1
Palm Springs Deauville		10	2		12
Palm Springs Villa Hermosa		3	1		4
Palm Springs Villas I		3			3
Plaza Villas		8	20		28
Racquet Club Colony		2			2
Racquet Club Cottages West		1	5		6
Racquet Club Garden Villas		2			2
Ranch Club Palm Estates			4	1	5
Rancho El Mirador			2		2
Sandstone Villas		2	5		7
Sophia HOA		1	2		3
Sundance II			7	1	8
Sundance Villas			10	1	11
Sunkist Villas			2		2
Sunrise Racquet Club			4		4
The Desert Star		6			6
The Palms			1	1	2
Vacation Internationale			1		1
Ventana Del Sol		8		1	9
Villas de Las Flores			8		8
Zanjero Residences, Inc				1	1
Pending Entry		6	5	3	14
Grand Total		142	199	34 2	377
	1				

		Total Beds
Condo HOA Count	40	
Total 1 Bedroom	142	142
Total 2 Bedroom	199	398
Total 3 Bedroom	34	102
Total 4 Bedroom	2	8
Total VR Condo	377	
Total VR Condo Beds	650	

### Coachella Valley Hotel Information

Coachella Valley Hotel Room	Existing	Planned		
Cathedral City		719	100	
Coachella			250	
DHS		561		
Indian Wells		1,484	152	
Indio		1,331	93	
La Quinta		1,095	608	
Palm Desert		2,282	536	
Palm Springs		5,684	527	
Rancho Mirage		1,728		
Total		14,884	2,266	



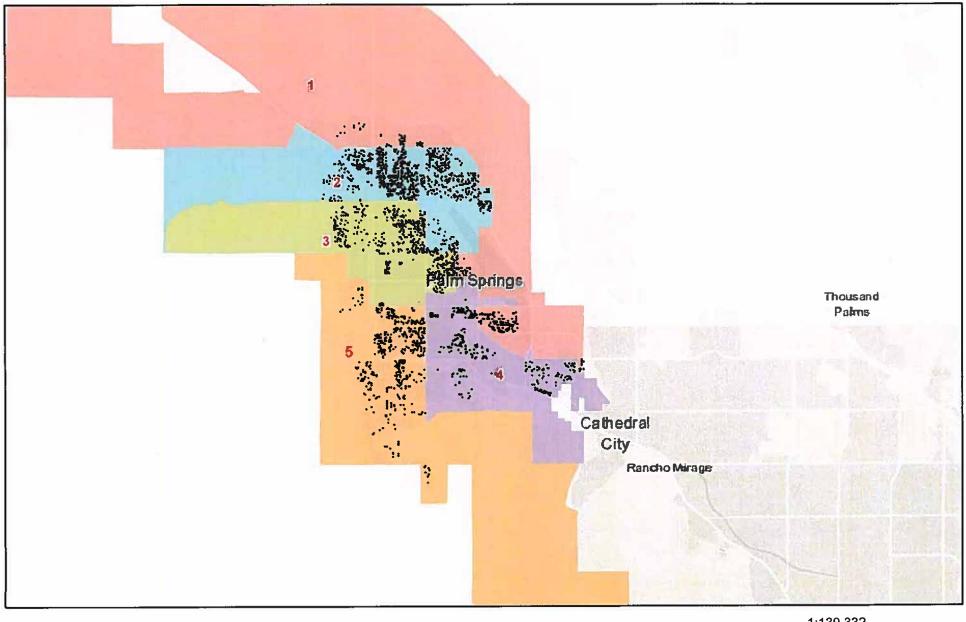
				occ	ADR
2018	January	City of Palm Springs, CA+	Total	62.4%	\$154.21
	February	City of Palm Springs, CA+	Total	75.9%	\$183.12
	March	City of Palm Springs, CA+	Total	85.8%	\$209.66
	April	City of Palm Springs, CA+	Total	74.4%	\$237.49
	May	City of Palm Springs, CA+	Total	60.8%	\$165.58
	June	City of Palm Springs, CA+	Total	52.8%	\$130.43
	July	City of Palm Springs, CA+	Total	52.7%	\$116.75
	August	City of Palm Springs, CA+	Total	48.3%	\$118.14
	September	City of Palm Springs, CA+	Total	54.3%	\$136.62
	October	City of Palm Springs, CA+	Total	58.3%	\$155.19
	November	City of Palm Springs, CA+	Total	65.3%	\$168.75
	December	City of Palm Springs, CA+	Total	59.3%	\$155.65
2019	January	City of Palm Springs, CA+	Total	61.2%	\$161.66
2017	February	City of Palm Springs, CA+	Total	73.5%	\$186.19
	March	City of Palm Springs, CA+	Total	83.7%	\$219.57
	April	City of Palm Springs, CA+	Total	74.8%	\$237.43
	May		Total	65.7%	\$170.95
	June	City of Palm Springs, CA+	Total	57.2%	\$170.75
		City of Palm Springs, CA+		53.6%	\$132.26
	July	City of Palm Springs, CA+	Total Total	52.4%	\$121.43 \$124.47
	August	City of Palm Springs, CA+	Total	55.5%	
	September	City of Palm Springs, CA+	Total	60.9%	\$136.98
	October	City of Palm Springs, CA+	Total		\$158.69
	November	City of Palm Springs, CA+	Total	62.8%	\$167.50
0000	December	City of Palm Springs, CA+	Total	52.9%	\$153.20
2020	January	City of Palm Springs, CA+	Total	63.5%	\$163.35
	February	City of Palm Springs, CA+	Total	74.2%	\$194.98
	March	City of Palm Springs, CA+	Total	34.1%	\$181.34
	April	City of Palm Springs, CA+	Total	21.4%	\$88.71
	May	City of Palm Springs, CA+	Total	29.1%	\$88.62
	June	City of Palm Springs, CA+	Total	34.1%	\$126.11
	July	City of Palm Springs, CA+	Total	40.4%	\$134.52
	August	City of Palm Springs, CA+	Total	42.0%	\$132.33
	September	City of Palm Springs, CA+	Total	44.9%	\$144.90
	October	City of Palm Springs, CA+	Total	46.3%	\$159.86
	November	City of Palm Springs, CA+	Total	43.8%	\$154.36
	December	City of Palm Springs, CA+	Total	28.5%	\$120.12
2021	January	City of Palm Springs, CA+	Total	31.8%	\$109.98
	February	City of Palm Springs, CA+	Total	48.4%	\$149.96
	March	City of Palm Springs, CA+	Total	59.8%	\$176.98
	April	City of Palm Springs, CA+	Total	65.2%	\$206.56
	May	City of Palm Springs, CA+	Total	59.4%	\$200.66
	June	City of Palm Springs, CA+	Total	55.8%	\$162.40
	July	City of Palm Springs, CA+	Total	54.5%	\$154.98
	August	City of Palm Springs, CA+	Total	50.0%	\$147.83
	September	City of Palm Springs, CA+	Total	51.6%	\$166.99
	October	City of Palm Springs, CA+	Total	63.6%	\$208.35
	November	City of Palm Springs, CA+	Total	68.7%	\$202.18
	December	City of Palm Springs, CA+	Total	62.4%	\$187.08
2022	January	City of Palm Springs, CA+	Total	58.7%	\$182.27
	February	City of Palm Springs, CA+	Total	71.7%	\$241.23
	March	City of Palm Springs, CA+	Total	77.1%	\$262.81
	April	City of Palm Springs, CA+	Total	75.1%	\$309.50
	May	City of Palm Springs, CA+	Total	60.9%	\$220.81
	June	City of Palm Springs, CA+	Total	52.9%	\$162.00

# Attachment "C"

# Registered Vacation Rental Properties by Council District

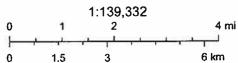
Count of Vacation Rentals	District	% Tota	I VR	Council Representative
202	1	1	8.26%	Grace Garner
922		2	37.69%	Dennis Woods
551		3	22.53%	Geoff Kors
287	•	4	11.73%	Christy Holstege
484		5	19.79%	Lisa Middleton
2446				

# Office of Special Programs



8/22/2022

Registered Vacation Rental Properties by Council District



Loma Linda University, Agua Caliente Band of Indians, County of Riverside, Bureau of Land Management, Esri, HERE, Garmin, USGS, EPA, NPS, Esri,

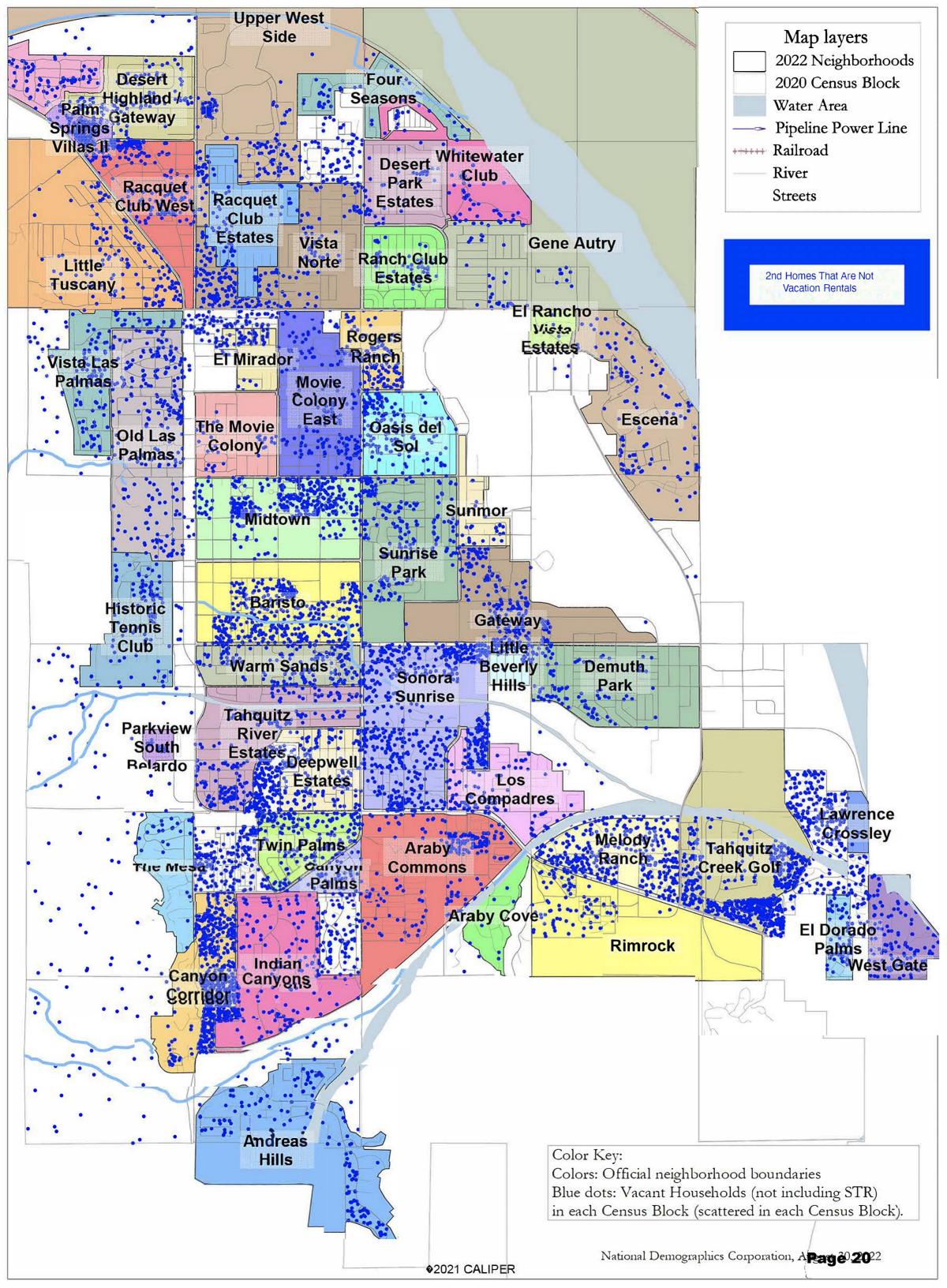
# Attachment "D"

While the ultimate interpretation of a statute is an exercise of judicial power, when an administrative agency is charged with enforcing a particular statute, its interpretation of the statute will be accorded great respect by the courts and will be followed if not clearly erroneous (*No Oil vs. City of Los Angeles* (1987) 196 Cal. App. 3d 223, 245-246). Given the great deference to be given to the City's historical interpretation of its own zoning ordinance, the Court finds there is no abuse of discretion, and denies the Petition in that regard. The Court finds that the City's adoption of the 2008, 2014, 2016 and 2017 Ordinances reflect its long-standing and consistent interpretation of its Zoning Code that the STRs are not a prohibited "commercial" use of residential property. That interpretation is entitled to deference, and Petitioner has failed to establish that it is clearly erroneous (*No Oil, Inc. vs. City of Los Angeles* (1987) 196 Cal. App. 3d 223, 245-246).

Petitioner also argues that City abused its discretion because there is nothing in Ordinance No. 1918 to ensure or require that the SRTs are actually ancillary or secondary uses of the residential properties. In response, City notes that Ordinance 1918 does not require STRs to be "ancillary and secondary" to the residential use of a property: the Ordinance reaffirms the City's longstanding determination that STRs are ancillary and secondary uses of the properties (AR 754; 3266). Accordingly, the Court finds Petitioner's demands that the STRs have a ownership residency requirement to be without merit.

Finally, Petitioner argues that Ordinance No. 1918 and City's policy is inconsistent with Palm Springs' General Plan Policy HS1.8 (AR 0558), which directs the City to "Protect established single-family residential neighborhoods from the transition, intensification, and encroachment of uses that detract and/or change the character of the neighborhood." Petitioner argues the widespread conversion of residential dwellings to SRTs results in intensification of uses that can cause profound changes in the character of residential neighborhoods.

# Attachment "E"



Neighborhood	2010 Housing Units	2020 Housing Units	2010 Owner Occupied	2020 Owner Occupied	2010 Housing Full Time Rental	2020 Housing Full Time Rental	2010 Vacant Units	2020 Vacant Units
Citywide Totals	34,791	35,184	13,458	15,263	9,287	8,649	12,046	11,004
Change in # of Units		393		1,805		-638		-1,042
% Change 2010 to 2020		1.1%		13.4%		-6.9%		-8.7%
% of Total Housing			38.7%	43.9%	26.7%	24.9%	34.6%	31.6%