

TECHNICAL MEMORANDUM

To: Mr. Andrew Carlberg, Manager
CC: Ms. Abbie Wagner, CWP
From: Steven M. Ravel, PE, BCEE, PMP, ENV SP
Date: July 1, 2024
Subject: Upper Blue Sanitation District
Short-Term Rental (STR) Evaluation

PURPOSE

The purpose of this technical memorandum (TM) is to summarize the District's short-term rental (STR) Resolution No. 17 of December 12, 2019; Summit County's STR resolution; the Town of Blue River's STR licensing process; and the Town of Breckenridge's STR code and to identify impacts and recommendations regarding the District's STR Rules and Regulations. A summary of the District, County, and Town STR "policies", impacts, and recommendations are provided.

INTRODUCTION

STRs in Summit County, the Town of Blue River, and the Town of Breckenridge allow for an increased overnight short-term housing population compared to the original property allocation. The increased short-term housing population results in increased average, maximum month, peak day, and peak hour wastewater flow and loadings to the District's facilities.

The intent of the review of the District's STR resolution is to ensure that the District is fair and equitable to existing non-STR and STR customers in consideration of the recently adopted Summit County STR resolution; the Town of Blue River STR licensing process; and the Town of Breckenridge STR code. The District's STR resolution will require future evaluation as the county and towns revise their resolution, licensing process, and code.

The District's philosophy for and approach to wastewater collection and treatment service includes:

- protection of public health and water supplies in and downstream of Summit County, the Town of Blue River, the Town of Breckenridge;
- protection of the environment including wildlife, fisheries, and recreation;
- avoiding collection and treatment failures that endanger public health and cause degradation to the environment;
- utilizing a multi-user class rate structure to ensure that a single customer class does not subsidize other customer class rates (e.g., residential customers do not pay higher rates that subsidize commercial users);
- design, operate, maintain, and construct facilities to achieve compliance during peak loading, which is necessary to ensure a consistent and properly functioning wastewater system and environmental regulatory compliance;

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- design, operate, maintain, and construct facilities that achieve compliance with an evolving regulatory regime that is adopting stringent water quality standards and regulations;
- use of the wastewater treatment and collection system that is consistent with their design (*e.g.*, single-family home areas were designed to be used as such, not as multi-family, resulting in operational and administrative demands that are inconsistent with, and in excess of, the designed usage); and
- preparation for future funding of operations, maintenance repairs, and capital expansion through a dynamic and robust ten-year financial plan including not imposing a mill levy on customers for the past 30-years, while also maintaining low fees per single family equivalent (SFE).

The District understands that a failure in the District’s collection and treatment system and/or permit exceedances at the wastewater treatment facilities (WWTF) could:

- jeopardize the source water quality of drinking water supplies and cause public health issues;
- degrade water quality in the environment, negatively impacting wildlife, fisheries, ecosystems, and recreation;
- result in monetary fines from the Colorado Department of Public Health and Environment (CDPHE) and the US Environmental Protection Agency (EPA), which could result in increases to user fees;
- reduce public trust with the District;
- impact the tourism and recreation driven economies of Summit County, the Town of Blue River, and the Town of Breckenridge communities through negative publicity.

The District has identified the following strategic measures in an effort to protect the public health and environment and minimize negative impacts to the surrounding communities:

- Provide biological, physical, and chemical treatment processes at the District facilities that achieve effluent compliance during peak day events, in addition to consistently remaining below the maximum monthly CDPHE discharge permit requirements.

The District’s treatment process selection has allowed the District to consistently achieve WWTF effluent compliance in a resort style community that experiences significant daily, weekly, monthly, and seasonal population changes. For example, the Town of Breckenridge website reports that the Town’s permanent population is approximately 4,500 people and that the Town’s peak day population exceeds 39,000 people on a busy day (an increase of approximately 770% $((39,000 - 4,500)/4500) \times 100\%$).

<https://www.townofbreckenridge.com/live/living-in-breckenridge#:~:text=Although%20the%20Town%20is%20home,39%2C000%20on%20a%20busy%20day>

- Biological treatment is the District’s principal wastewater treatment process to achieve compliance with effluent limitations. The biological process takes time to establish the required characteristic of biological species for treatment and must remain active during peak seasons (*e.g.*, cannot be turned on and off as flows vary throughout a week or month). The District utilizes additional and redundant biological, physical, and chemical treatment processes to allow the District to bring treatment processes into operation as required. The redundant processes allow the District to remain operational in times of repair.
- Provide level staffing through the year to allow for consistent training, operations, and maintenance of District facilities. The District requires certified operations staff at each treatment facility to comply with CDPHE and EPA regulations. The staff operations certifications require staff time and ongoing training to obtain.



- Provide service fees and other charges that allow for operation and maintenance of the existing collection and treatment system while investing for future infrastructure that will be required to achieve compliance with future WWTF effluent discharge limitations. The District is a quasi-municipal enterprise and as such has the ability to levy fees and charges to support District functions. As a quasi-municipal government, the District has the ability to impose a property tax to fund District functions. The District has elected not to impose such a tax and is funded mainly on service fees and plant investment fees (PIF).
- Provide a flat rate fee structure that is based on peak flow and loading requirements to achieve the goals of the District. Peak loading events are not captured by average water consumption and average wastewater generation.

EXECUTIVE SUMMARY

The District should consider the following recommendations:

- Ongoing evaluation of the District’s STR resolution as the county and towns revise their resolution, licensing process, and code over time.
- Continue to review the Plant Investment Fee (PIF) periodically and update as required.
- Add a statement in the Rules and Regulations that “Single-Family Residences and Manufactured Homes” include “Mobile Homes” that are permanently located within the District (e.g., not recreational vehicles (RV) that are moved periodically).
- Designate “Travel Trailer Park” locations operated as an STR and invoice as an STR in accordance with the Rules and Regulations.
- Add a statement in the Rules and Regulations that “Bed and Breakfast” units identified in the same user class as “Single-Family Homes” that are used as an STR will be designated as an STR and invoiced accordingly.
- The District does not monitor unit occupancy (e.g., on a daily or monthly basis) and will continue to charge the STR fee to the customer as if the unit is an STR for the entire year as long as the STR has an active license.
- The projected flow (and associated loading) for STR occupancy for each category in the Summit County Resort and Neighborhood Overlay Zones; the Town of Blue River; and the Town of Breckenridge are shown in Table No.’s 2 through 6. A summary of findings include:
 - Properties used as an STR generally have an increased flow (and associated loading) impact compared to the District allocation due to the increase in number of people permitted at the STR versus their original occupancy designation. The increased flow (and associated loading) indicates that the District may be undercharging STR customers based on permitted occupancies.
- The District’s facilities are designed to handle the greater peak daily flow that results for STRs regardless of the number of rental days. As a result, a reduction in fees for facilities that rent out for less than 21-days per year (Town of Breckenridge) or other reduced rental periods is not recommended as the District designs, constructs, operates, and maintains its facilities for peak daily flow and loadings to provide reliable service to its customers.



- The population, flow, and loading from STRs are similar and comparable to multiplex units as shown in Tables 2 through 6 and the District should continue to:
 - Maintain the single-family equivalent (SFE) allocation and associated annual service fees for short-term rental properties using the multiplex classification, which is based on the number of bedrooms and bathrooms, until such time that the properties are returned to typical residential use and associated population, flow, and loading.
 - Capture additional PIF for short-term rental properties using a monthly capital charge to recover the cost associated with the increased flow and loading to the system until such time that the properties are returned to typical residential use and associated population, flow, and loading.
- Develop a Declaration of Restrictive Covenants process and application form that temporarily (annually) relaxes the District application of Resolution No. 17 Series 2019 for District property owners who hold short-term rental licenses and represent that they do not plan to rent their properties.
- Limit the maximum monthly capital charge as referenced in Table 4 of the TM titled *Short-Term Rental Rate Impacts* of November 20, 2019 at \$45.28 per SFE based on the 2023 PIF of \$13,584 per SFE (e.g., \$13,584 per SFE / 300 months (25-years)).

BACKGROUND

Upper Blue Sanitation District

The District designs, constructs, operates, and maintains its facilities for peak daily flow and loadings to provide reliable service to its customers. As such, the District’s definition of an SFE is based on the maximum (or peak) daily loading as opposed to an average weekly, monthly, or annual loading.

The District’s customers are located within Summit County, the Town of Blue River, and the Town of Breckenridge.

The District’s customer classification system and rate structure is based on single family equivalents (SFE). The guiding principle for classifying customers is to group customers with similar use characteristics. The customer classification system allows for the fair and equitable allocation of capital, operation, maintenance, and replacement costs to groups of customers with similar use characteristics as noted in the Technical Memorandum titled *Short-Term Rental Rate Impacts* of November 20, 2019.

The District adopted Resolution No. 17, Series 2019 titled *Amendment of Rules and Regulations Related to the SFE Conversion Rate for Single-Family Residences and Manufactured Homes used for Short Term Rentals* in December 2019. Relevant items from Resolution No. 17 are shown in bold and include:

- “...**single-family residences and manufactured homes that are rented out on a short-term basis (less than 30 consecutive days)** are regulated by the Town of Breckenridge, the Town of Blue River, and Summit County through their respective codes...”
- “...**Multiplex Units have historically tended to be used for short-term rentals with occupancy rates and peak daily loadings that are higher than those for traditional single-family residences and manufactured homes** that are used by a single family in permanent residence...”
- “...converting single-family residences and manufactured homes used for short-term rentals **using the Multiplex Units category and the number of marketed/advertised bedrooms and bathrooms tended**”



to better reflect the peak daily loading impact of the short-term rental single-family residences and manufactured homes on the District's Facilities, with the marketed/advertised occupancy for single-family residences and manufactured homes used for short-term rentals averaging only about 10% higher than the occupancy contemplated by the current Conversion Schedule for Multiplex Units and the number of marketed/advertised bedrooms and bathrooms..."

- "...using the Single-Family Residences and Manufactured Homes category to convert single-family residences and manufactured homes that are used for short-term rentals underestimates the peak daily loading of those Buildings, and that using the Multiplex Units category and the number of marketed/advertised bedrooms and bathrooms for such conversion better estimates the peak daily loading of those Buildings which, in turn, better assures that these Buildings are paying their fair share of the costs of waste water collection and treatment..."
- "...using the Multiplex Units category and the number of marketed/advertised bedrooms and bathrooms to convert single-family residences and manufactured homes used for any short-term rental use to SFE Units for the purpose of assessing monthly service fees is reasonable, provides a more equitable allocation of operation and maintenance costs among the District's customers..."
- "The Single-family Residences and Manufactured Homes conversion category shall not apply to single-family residences and manufactured homes that are rented out at any time for less than 30 consecutive days (herein "Short-Term Rental Use")..."
- "If a single-family residence or manufactured home is included on the list of units used for Short-Term Rental Use maintained by the Town of Breckenridge, the Town of Blue River, or Summit County on October 1 of any particular year, the District will treat that Building as if it will be used for Short-Term Rental Use from October 1 of that year to September 30 of the following year, and for that entire 12-month period, regardless of its actual use, that Building will be converted to SFE Units for monthly service fee purposes using the Apartments, Townhouses, Multiplexes, and Condominium Units conversion rates and the greater of: the number of marketed/advertised bedrooms and bathrooms, or the number of bedrooms and bathrooms listed in the District's records; and, in addition, that Building will be assessed a Monthly Capital Charge for each month during that entire 12-month period."
- "If a single-family residence or manufactured home is included on the Towns' or County's Short-Term Rental Use lists at any time after the start of a particular Service Year (i.e., after October 1 of any particular year), the District will treat that Building as if it will be used for Short-Term Rental Use for the remainder of that Service Year (i.e., from the date the Building is included on such list to the immediately following September 30), and for the remainder of that Service Year, regardless of its actual use, that Building will be converted to SFE Units for monthly service fee purposes using the Apartments, Townhouses, Multiplexes, and Condominium Units conversion rates and the greater of: the number of marketed/advertised bedrooms and bathrooms, or the number of bedrooms and bathrooms listed in the District's records; and, in addition, that Building will be assessed a Monthly Capital Charge for each month during the remainder of that Service Year."

District rate and SFE information and typical wastewater flow and loading values were obtained from the District's Rules and Regulations of July 2023; *Wastewater Flow Monitoring Program* report by Richard P. Arber Associates of October 1, 1997; *Single Family Equivalent Evaluation* report by Richard P. Arber Associates of



October 30, 2003; *Short-Term Rental Rate Impacts* TM by Mott MacDonald of November 20, 2019; and *Wastewater Engineering Treatment and Reuse* by Metcalf and Eddy, Fourth Edition. District information and typical wastewater values include:

- Plant Investment Fee (PIF) Amount: \$13,584 per SFE (2023) and \$14,584 per SFE (2024) (the term “PIF” is not defined in the Rules and Regulations)
- Annual Service Fee: \$336 per SFE (2023) and \$348 per SFE (2024) (“...monthly service fee which is intended to cover said Owner's equitable share of the costs to operate, maintain, repair, replace, and upgrade the District Facilities and the costs to manage the District.”)
- Persons per SFE: 3.5 people per SFE
- Flow: 85.7 gallons per capita per day (gpcpd)
- Flow: 300 gpd/SFE (3.5 people per SFE x 85.7 gpcpd)
- Biochemical Oxygen Demand (BOD): 0.18 pounds per capita per day (lbs/capita-day) or 0.63 pounds per day (based on 3.5 people)
- Total Suspended Solids (TSS): 0.18 pounds per capita per day (lbs/capita-day) or 0.63 pounds per day (based on 3.5 people)
- Ammonia as N (NH₃ as N): 0.017 pounds per capita per day
- Total Phosphorus (TP): 0.007 pounds per capita per day
- Single-Family Residences and Manufactured Homes (“Mobile” and “Tiny Houses”)
 - Three bedrooms or less: 1 SFE
 - Each bedroom in excess of three: 0.4 SFE
 - Each bath, or portion thereof, in excess of two: 0.2 SFE
- Apartments, Townhouses, Multiplexes, and Condominium Units:
 - Two bedrooms or less: 1 SFE
 - Each bedroom in excess of two: 0.4 SFE
 - Each bath, or portion thereof, in excess of one: 0.4 SFE
- Studio Apartments / Condominiums
 - Single room less than 600 square feet with single bathroom and kitchen: 0.7 SFE
- Accessory Units
 - Accessory units shall be equal to or less than one-third the total square footage of the attached or unattached residence on a single parcel. Total square footage of accessory unit shall not exceed 1,200 square feet: 0.7 SFE
- Lodges, Hotels, and Motels, per rental room: 0.6 SFE
- Bed and Breakfast
 - Three bedrooms or less: 1 SFE
 - Each bedroom in excess of three: 0.4 SFE
 - Each bath, or portion thereof, in excess of two: 0.2 SFE
- Dorms, bed: 0.25 SFE
- Travel Trailer Parks
 - Without individual water and sewer hookups, per space: 0.2 SFEs
 - With individual water and sewer hookups, per space: 0.25 SFEs
- If more than one use category is applicable to a particular Building, the Building will be divided into areas of similar use categories and the SFE Units for the Building will be computed by adding the SFE Units determinations for each use category area.



- For the purpose of SFE Unit determinations, a loft area shall be equivalent to a minimum of one bedroom in apartments, townhouses, multiplexes, condominium units, lodge rooms, hotel rooms, and motel rooms. More than 1.0 SFE Unit per Building may be assigned if warranted by the size and characteristics of the loft area. For the purpose of SFE Unit determinations, an area designated as a den, library, study, sewing room or the like shall be equivalent to a minimum of one bedroom if such area has an accompanying closet. Lock-off units in condo-hotels will be assessed as a separate unit on a "per rental room" basis.
- For the purpose of this Appendix, a "multiplex" is any Building in a duplex, triplex, fourplex, etc. configuration. Additionally, any residential building or unit which purports to be a single-family residence or a single residential unit will be considered a multiplex if it has more than one kitchen area, and any portion of said residential building or unit that can be used independently of the remainder of the residential building or unit (e.g., lock-off unit) shall be considered a separate residential unit for SFE Unit conversion purposes.

Summit County

Summit County adopted Ordinance No. 20-C titled *A Revised and Restated Ordinance for Short-Term Vacation Rental Regulations and Repealing all Ordinances in Conflict Therewith* in January 2023. Relevant items from Ordinance No. 20-C are shown in bold and include:

- "...approximately 30% of Summit County's housing stock being utilized as such short-term vacation rentals..."
- "...**short-term vacation rental units has a variety of effects** on the neighborhoods in which such units are located, as well as on the community as a whole, **including issues with increased** noise at all fronts, parking problems, and trash not being kept or disposed of properly..."
- "...**adding two overlay zones, the Neighborhood Overlay Zone and the Resort Overlay Zone, and establishing four different license types** for short-term vacation rentals within those zones..."
- "For purpose of this Ordinance, the term "**short-term vacation rental property**" is defined as a **residential dwelling unit, or any room therein, available for lease or exchange for a term of less than thirty (30) consecutive days** ("Property")."
- "'Booking' means an agreement to rent a unit for a period of less than 30 consecutive days for an exchange of consideration."
- "'Qualified Occupant' means a person 18 years of age or older, along with his or her Dependents, if any, who at all times during ownership or occupancy of the Unit, resides and is employed within the County year round, an average of at least 30 hours per week on an annual basis."
- "'Employed within the County,' also referred to as 'Local Employment', shall mean that the person earns his or her living from a business or organization operating in and serving Summit County, which requires his or her physical presence within the boundaries of Summit County in order to complete the task or furnish the service, by working in the County at such business or organization an average of at least 30 hours per week on an annual basis."
- "Self-Employment and residents that work from home: For individuals claiming self-employment or work from home status, the employment must be for an average of at least 30 hours per week on an annual basis for a business that is located within and serves Summit County and requires their physical



presence within the boundaries of Summit County in order to complete the task or furnish the service, and such individuals must demonstrate they are earning at least minimum wage from this employment.”

- “Retirees: Qualified Occupants may be authorized to retire if the person is at or above the full benefit age for federal Social Security, has worked in Summit County an average of at least 30 hours per week on an annual basis for at least 10 continuous years prior to retirement.”
- “Partial Retirement: Qualified Occupants may be authorized to reduce local employment to a minimum of 15 hours per week on annual basis, if the occupant has worked in Summit County an average of at least 30 hours per week on an annual basis for at least 15 continuous years prior to partial retirement.”
- “STR Resort Overlay Zone: maps of the STR Resort Overlay Zone are included...”
- “STR Neighborhood Overlay Zone is defined as all areas of unincorporated Summit County outside of the STR Resort Overlay Zone.”
- “**Ensure that short-term vacation rentals are operated in a manner that is in compliance with all applicable rules, laws, and regulations**, as well as compatible with the surrounding neighborhood and protects the overall community character.”
- “**The regulations set forth in this Ordinance shall apply to short-term vacation rental Property only, as defined herein.** This Ordinance shall not apply to the furnishing of lodging services in hotels, motels, lodges, or units within a building operating akin to that of a hotel motel with a central check-in located within such facility, or to long-term leases.”
- “License Required. No person or entity may advertise or operate an STR without a valid license.”
- “**A short-term vacation rental license shall expire on September 30 of the calendar year** following the year of initial license issuance, or when title of the short-term vacation rental Property transfers to a new owner, whichever occurs first. Each change in ownership of a short-term vacation rental Property shall require a new license, unless meeting one of the exceptions...”
- “Resort Overlay Zone: A Resort License will apply to properties within the Resort Overlay Zone.
 - a. Maximum occupancy at any time may not exceed the following, unless further restricted by an on-site wastewater treatment system (OWTS)...:
 - i. **Single family, duplex and townhome units: a) two (2) persons per bedroom plus four (4) additional occupants; OR b) 1 person per 200 square feet of living area, whichever allows for a greater occupancy,**
 - ii. Condominium units: a) two (2) persons per bedroom plus four (4) additional occupants, or two (2) persons per bedroom plus two (2) additional occupants in buildings with interior egress components less than 44 inches wide and without a sprinkler system; OR b) 1 person per 200 square feet of living area, whichever allows for a greater occupancy. When a condominium unit contains a County-approved lock-off room that meets the definition of a lock-off room set forth in Chapter 15 of the Development Code, the lock-off room shall be allowed a total of 4 occupants.
 - iii. **Properties requesting occupancy in excess of 19 (people) must first obtain a Class 2 Conditional Use Permit through the Planning Department.**
 - b. **Limitation on Number of Bookings: no annual limit.”**



“Neighborhood Overlay Zone: A Type I or Type II License will apply to properties within the Neighborhood Overlay Zone,...

a. Type I License:

- i. To be eligible for a Type 1 license, the **STR Property must be the primary residence of a member of the local workforce, meeting the definition of a Qualified Occupant.** A primary residence is that which is occupied by the Qualified Occupant as that individual’s principal place of residence at least 9 months out of the year....
- ii. If an ADU is removed from a property by the current owner, such property shall not be eligible for a Type I License for a period of 3 years from the date of removal.
- iii. **Maximum Occupancy at any time shall not exceed 2 renters per bedroom + 2 additional renters,...**
- iv. Allowable Uses of a Type I License:
 - (a) **When the Qualified Occupant is on-site during rentals and is engaged in partial home rental, no more than 50% of the approved bedrooms in the home, up to 2 bedrooms may be short-term rented.**
 - (b) The Qualified Occupant may live on a property with a permitted ADU.
 - (i) Management of the STR on the property shall not comprise a majority of the hours claimed for Qualified Occupant status.
 - (ii) Applicants with an ADU seeking a Type I license shall utilize the most recent ADU covenant required by Section 3809 of the Code.
 - (iii) As required by the ADU covenant, the Owner may not be the Qualified Occupant of the restricted unit (usually the ADU) since the restricted unit must be rented to a member of the local workforce meeting the definition of Qualified Occupant, i.e. the owner may not live in the ADU and apply for a Type I STR license to rent their main house, or vice-versa.
 - (c) At all times the property shall be the principal place of residence of the Qualified Occupant at least 9 months out of the year.
 - (d) A Bed and Breakfast may not be operated under a Type I license.
- v. **Limitation on Number of Bookings: no more than 35 bookings per year, as calculated from October 1 through September 30.**

b. Type II License:

- i. **Maximum Occupancy may not exceed 2 renters per bedroom + 2 additional renters, unless further restricted by an OWTS...**
 - ii. **Limitation on Number of Bookings: no more than 35 bookings per year, as calculated from October 1 through September 30, unless approved as a Bed and Breakfast...”**
- “Units on on-site wastewater treatment systems (OWTS): the maximum overnight occupancy of the unit shall be limited to the capacity established on the OWTS permit. **OWTS systems in Summit County are typically designed to accommodate a maximum occupancy of 2 persons per bedroom.”**



- “For the purposes of these regulations, a **loft which meets the Summit County Building Department requirements for a potential sleeping room shall be allowed 2 occupants**. Studios will be treated as one-bedroom units for the purposes of this Section.”
- “**Occupancy as permitted in the license is the total number of persons who may be at the Property at any one time.**”
- “Application materials shall include all information and materials as set forth in this Ordinance as required in the application system...**If applicable, documentation of water supply and septic capacity adequate to serve the proposed use, including but not limited to improvements such as hot tubs**. Such documentation shall include submittal of well permit, OWTS permit, and pumper report.”
- “**All improvements on the Property shall be permitted by the Building Inspection Department, Environmental Health Department, Engineering Department, and all other applicable agencies**. Buildings, structures, or rooms shall not be used for purposes other than those for which they were designed or intended, i.e. rooms not approved as “sleeping rooms” by the Building Inspection Department shall not contain beds.”
- “**Occupancy of a recreational vehicle is prohibited on any Property that has obtained a short-term vacation rental license.**”

Town of Blue River

The Town of Blue River Municipal Code for STRs is *Section 6 – Business Licenses and Regulations, Article 1 Short-Term Rental Licensing and Operation* of March 9, 2023. Relevant items from Section 6 are shown in bold and include:

- “**Short-term rental means the rent for any form of consideration of a dwelling, dwelling unit, accessory dwelling unit, or portion of any dwelling unit to a specific person or persons for periods of time less than thirty (30) consecutive days**. Further, a short-term rental is an activity that shall remain a privilege for a property owner that is accessory, ancillary, and subordinate to the primary or principal residential use of such dwelling or dwelling unit. **The phrase short-term rental does not include commercial hotels or motels.**”
- “**A license issued pursuant to this Article is not required for rental of residential property for a period equal to or greater than thirty (30) consecutive days to the same person, persons, or entity**. Agreements for rental terms of less than thirty (30) days shall not be combined or aggregated for the purpose of evading short-term rental licensing or regulation.”
- “**Only owners in fee simple of dwelling units lawfully constructed and lawfully existing within the R-1 Zone District shall be eligible for issuance of a short-term rental license.**”
- “**Persons or entities that rent a dwelling unit (whether on a short-term or long-term basis) shall not be eligible for issuance of a short-term rental license.**”
- “Property designated, declared, deed-restricted, or reserved as affordable housing, employee housing, long-term rental housing, low-income housing, or other similar classification by the state of Colorado, any county or municipal government, special district, governmental or quasi-governmental authority or entity, or political subdivision shall be ineligible for the issuance of a short-term rental license. It is the



intent of this Article to limit the privilege of short-term rentals to property generally unrestricted and available for use as a single-family residence.”

- **“The Town Manager may submit any application for a short-term rental to any utility provider, governmental or quasi-governmental agency, law enforcement agency, or any other provider of services to the property in order to evaluate whether the operation of the short-term rental will comply with any applicable laws, regulations, standards, or rules.”**
- **“License term—New licenses. All new short-term rental licenses shall be issued for a term to commence on the date of issuance and to expire on December 31 of the year in which the license was issued.** Applicants are strongly encouraged to apply for licenses earlier in the year or to wait until the end of a year to maximize the term of the license.”
- **“Occupancy limitation. During the period of any short-term rental, the dwelling unit may not exceed an occupancy of two (2) persons for each bedroom...plus a total of two (2) additional persons.** For example, a two-bedroom residence shall be limited during the period of any short-term rental to a total occupancy of six (6) persons.”
- **“The Town Manager may reduce the maximum occupancy where the Manager determines based upon reasonably credible information that: (1) the available utility capacity for the short-term rental property is insufficient to support the maximum occupancy; or (2) that a utility service provider has established a lower maximum or permitted occupancy for the short-term rental property for utility purposes; or (3) building, construction permitting, or other public records demonstrate that the short-term rental property did not receive required approval of any existing rooms proposed for use for overnight stay.** In rendering such determination, the Town Manager may rely upon information, records, or data available to the public.”
- **“The Town shall establish as a condition of the license the total maximum occupancy limitation for the dwelling unit during the term of any short-term rental.”**

Town of Breckenridge

The Town of Breckenridge Town Code for STRs is *Chapter 6 – Accommodation Unit Regulations (More Commonly Known as “Short-Term or Vacation Rentals”)* of May 23, 2023. Relevant items from Chapter 6 are shown in bold and include:

- **“ACCOMMODATION UNIT:** A separate and distinct living unit including condominium, townhome, house, trailer, studio unit, condominium unit, or any such other similar unit which is rented to any person, who, for consideration, uses, possesses or has the right to use or possess such accommodation unit for a period of less than thirty (30) consecutive days, regardless of the number of days during a license year such unit is rented.”
- **“OCCUPANCY LIMIT:** The maximum number of persons permitted to reside overnight in an accommodation unit.”
- **“RESORT PROPERTY OR PROPERTIES:** A multi-unit accommodation property or properties, with each unit having separate ownership, where guests have access to numerous on-site amenities similar to the operations of a resort hotel.”



- “Prior to operating an accommodation unit under this chapter, a licensee must be eligible for, apply and receive a business and occupational license ...”
- “An accommodation unit license issued pursuant to this chapter shall be valid until abandoned, voluntarily surrendered, not renewed, revoked by the finance director or due to a transfer of title to the real property.”
- **“...the annual accommodation unit fee for 2022 shall be four hundred dollars (\$400.00) per studio and/or per bedroom in any accommodation unit; provided, however, the regulatory fee established in this section shall not be imposed where the accommodation unit is the applicant’s primary residence and is rented out for a period of time not to exceed twenty one (21) days out of the year.”**
- **“To address the secondary impacts caused by the short-term rental industry by protecting the character of the local community and town neighborhoods** where accommodation units are located including but not limited to lack of parking, loud noise, and increased trash associated with the higher density use;”
- “Consistent with the town's land use district map and guidelines, the town **hereby establishes four (4) areas within the boundaries of the town of Breckenridge...**
 1. A tourism zone (“zone 1”);
 2. A downtown core zone (“zone 2”);
 3. Areas not categorized as a resort property nor included in zone 1 or 2 fall within zone 3 (“zone 3”); and
 4. Resort property zone.”
- The **resort property zone shall be comprised of the number of units available in the resort property zone** as of the effective date of the ordinance ...
 1. Zone 1 shall have no more than one thousand six hundred eighty (1,680) accommodation unit licenses.
 2. Zone 2 shall have no more than one hundred thirty (130) accommodation unit licenses.
 3. Zone 3 shall have no more than three hundred ninety (390) accommodation unit licenses.”
- “A licensee that was issued an accommodation unit license prior to the effective date of the ordinance codified in this chapter is not subject to the limitations...”
- “A person issued a building permit for a residential unit(s) on or before September 14, 2021, shall not be subject to the limitations set forth in subsection B of this section provided such person has applied for an accommodation unit license within twenty (20) days from the date of issuance of a certificate of occupancy.”



- “Resort property or properties shall provide:
 - A. Twenty four (24) hour on-site front desk that is monitored by a person on site;
 - B. Twenty four (24) hour phone line that is monitored by a person on site;
 - C. Twenty four (24) hour private security capable of responding to complaints within a reasonable amount of time. The person responsible for staffing the front desk and the security personnel cannot be the same staff member;
 - D. On-site housekeeping; and
 - E. Enclosed garage parking.”
- **“The occupancy limit for all accommodation units except studios shall be two (2) persons per bedroom plus four (4) additional Persons.** The occupancy limit for studio accommodation units shall be a total of four (4) persons.”

PIF DETERMINATION CASE LAW

The District's method for developing SFE determinations and assessing PIFs was supported by the Supreme Court of Colorado, Case No. 99SC491 of February 26, 2001 (Krupp v. the Breckenridge Sanitation District). The Court concluded that the District's rate design and differential charges implementing the rates, was rational based on documentation supporting that:

- multiplex units (such as apartment buildings and condominiums) are much more likely to be used as temporary rental units than are single family units.
- multiplex units have, on average, higher per unit peak day flows than single family units.
- the variation in selected conversion units used for residential users is therefore reasonable.
- the record is sufficient to establish a rational basis for the distinction between long- term and short-term residences in the District's SFE conversion schedule.
- the expected short-term, high-occupancy use of duplex units is typical of the multiplex unit conversion category, the District has a rational basis for assessing duplexes in the higher, multiplex category.
- the PIF rationally differentiates between different classes of buildings based upon anticipated peak wastewater flow per unit.



COMPARISON AND EVALUATION

The comparison of and the evaluation focuses on population and flow with acknowledgment that increased loadings are associated with increased flow and population. The District's rules and regulations for property types with various numbers of bedrooms, bathrooms, and occupancies compared to the County and Town STR requirements is summarized.

District

A summary of the District's allocated SFEs per Single-Family Residences and Manufactured Homes, for up to six (6) bedrooms, including people and flow allocations are shown in Table 1.

Table 1. District's Single-Family Residences and Manufactured Homes SFE Summary

A	B	C	D	E	F	G
No. of Bedrooms	No. of Bathrooms	Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)
1	<=2	1	--	1.0	3.5	300
2	<=2	1	--	1.0	3.5	300
3	<=2	1	--	1.0	3.5	300
4	<=2	1.4	--	1.4	4.9	420
5	<=2	1.8	--	1.8	6.3	540
6	<=2	2.2	--	2.2	7.7	660
2	3	1	0.2	1.2	4.2	360
3	3	1	0.2	1.2	4.2	360
4	3	1.4	0.2	1.6	5.6	480
5	3	1.8	0.2	2.0	7.0	600
6	3	2.2	0.2	2.4	8.4	720
3	4	1	0.4	1.4	4.9	420
4	4	1.4	0.4	1.8	6.3	540
5	4	1.8	0.4	2.2	7.7	660
6	4	2.2	0.4	2.6	9.1	780

Notes:

1. *Bedroom SFE Allocation (Column C) from Rules and Regulations.*
2. *Bathroom SFE Allocation (Column D) from Rules and Regulations.*
3. *Total No. of SFEs (Column E) = Column C + Column D*
4. *Allocated Occupancy (people) (Column F) = Column E x 3.5 people per SFE.*
5. *Allocated Flow (gpd) (Column G) = Column F x 85.7 gpcpd.*
6. *All possible combinations of bedrooms and bathrooms that exist in the District are not shown.*



Travel Trailers

Per Summit County ordinance, travel trailers (recreational vehicles (RV)) may not be used as an STR. The District has allocated:

- 0.2 SFEs (or 20% of an SFE) per travel trailer without individual water and sewer hookups, per space. An SFE of 0.2 SFEs equates to a population of 0.7 people per trailer (3.5 people per SFE x 0.20).
- 0.25 SFEs (or 25% of an SFE) per travel trailer with individual water and sewer hookups, per space. An SFE of 0.25 SFEs equates to a population of 0.7 people per trailer 0.875 people per trailer (3.5 people per SFE x 0.25).

Travel trailer park locations that are operated as an STR should be designated as an STR and invoiced in accordance with the Rules and Regulations.

Summit County

A comparison between the District's Rules and Regulations and Summit County's Ordinance regarding STRs includes the following observations:

- STR is defined as rentals for periods of time less than 30-days and does not include hotels or motels.
- The Summit County license expires on September 30, whether rented or not.
- The maximum occupancy for a Resort Overlay Zone non-OWTS single family is: *"...a) two (2) persons per bedroom plus four (4) additional occupants; OR b) 1 person per 200 square feet of living area, whichever allows for greater occupancy."*
- The Resort Overlay Zone has unlimited bookings.
- The maximum occupancy for a Neighborhood Overlay Zone non-OWTS, Type I primary residence occupied by a Qualified Occupant is: *"...two (2) renters per bedroom + two (2) additional renters..."* and *"...no more than 50% of the approved bedrooms in the home, up to 2 bedrooms may be short-term rented."*
- The maximum occupancy for a Neighborhood Overlay Zone non-OWTS, Type II is: *"...two (2) renters per bedroom + two (2) additional renters..."* The Neighborhood Overlay Zone, Type II does contain District customers.
- A loft shall be allowed *"...2 occupants..."*.
- The Neighborhood Overlay Zone has a limit of 35 bookings per year. The District does not monitor occupancy (e.g., on a daily or monthly basis) and will charge the STR fee to the customer as if the unit is an STR for the entire year.

A summary of Summit County's Resort Overlay Zone for Non-OWTS Single-Family Residence and Manufactured Home STR impacts, for up to six (6) bedrooms, including people and flow allocations, allowances, and increases in flow (and associated loading) are shown in Table 2.



Table 2. Summit County Resort Overlay Zone Non-OWTS Single-Family Residences and Manufactured Homes STR Impact Summary

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
No. of Bedrooms	No. of Bathrooms	Designated as Non-STR					Designated as STR					Non-STR Service Fee Compared to STR Service Fee					
		Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)	Calculated SFE	Allowed Occupancy (people)	Projected Flow (gpd)	Flow Increase (gpd)	Flow Change Impact (%)	Non-STR Designated Service Fee	Projected Annual Service Fee (Based on Population)	Change in Annual Service Fee	Service Fee Change (%)	Annual Capital Charge (25-Year Cost Recovery)	Total Annual Charge (Service Fee + Capital Charge)
1	<=2	1	0	1.0	3.5	300	1.71	6	514	214	71%	\$336	\$576	\$240	71%	\$388	\$964
2	<=2	1	0	1.0	3.5	300	2.29	8	686	386	129%	\$336	\$768	\$432	129%	\$699	\$1,467
3	<=2	1	0	1.0	3.5	300	2.86	10	857	557	186%	\$336	\$960	\$624	186%	\$1,009	\$1,969
4	<=2	1.4	0	1.4	4.9	420	3.43	12	1,028	608	145%	\$470	\$1,152	\$682	145%	\$1,102	\$2,254
5	<=2	1.8	0	1.8	6.3	540	4.00	14	1,200	660	122%	\$605	\$1,344	\$739	122%	\$1,195	\$2,539
6	<=2	2.2	0	2.2	7.7	660	4.57	16	1,371	711	108%	\$739	\$1,536	\$797	108%	\$1,289	\$2,825
2	3	1	0.2	1.2	4.2	360	2.29	8	686	326	90%	\$403	\$768	\$365	90%	\$590	\$1,358
3	3	1	0.2	1.2	4.2	360	2.86	10	857	497	138%	\$403	\$960	\$557	138%	\$900	\$1,860
4	3	1.4	0.2	1.6	5.6	480	3.43	12	1,028	548	114%	\$538	\$1,152	\$614	114%	\$994	\$2,146
5	3	1.8	0.2	2.0	7.0	600	4.00	14	1,200	600	100%	\$672	\$1,344	\$672	100%	\$1,087	\$2,431
6	3	2.2	0.2	2.4	8.4	720	4.57	16	1,371	651	90%	\$806	\$1,536	\$730	90%	\$1,180	\$2,716
3	4	1	0.4	1.4	4.9	420	2.86	10	857	437	104%	\$470	\$960	\$490	104%	\$792	\$1,752
4	4	1.4	0.4	1.8	6.3	540	3.43	12	1,028	488	90%	\$605	\$1,152	\$547	90%	\$885	\$2,037
5	4	1.8	0.4	2.2	7.7	660	4.00	14	1,200	540	82%	\$739	\$1,344	\$605	82%	\$978	\$2,322
6	4	2.2	0.4	2.6	9.1	780	4.57	16	1,371	591	76%	\$874	\$1,536	\$662	76%	\$1,071	\$2,607

Notes:

- Columns A through G from Table 1.
- Calculated SFE (Column H) = Column I x 3.5 people per SFE.
- Allowed Occupancy (Column I) from Summit County Ordinance.
- Projected Flow (Column J) = Column I x 85.7 gpcpd.
- Flow Increase (Column K) = Column J – Column G.
- Flow (and associated loading) Change Impact (Column L) = Column K / Column G
- Non-STR Designated Service Fee (Column M) = Column E x \$336 per SFE per year.
- Projected Annual Service Fee (Column N) = (Column I / Column F) * \$336 per SFE per year.
- Change in Annual Service Fee (Column O) = Column N – Column M.
- Service Fee Change (%) (Column P) = Column O / Column M.
- Annual Capital Charge (25-Year Cost Recovery) (Column Q) = 1/300 * \$13,584 per SFE * 12 months * (Column H – Column E).
- Total Annual Charge (Service Fee + Capital Charge) (Column R) = Column N + Column Q.
- All possible combinations of bedrooms and bathrooms that exist in the District are not shown.



A summary of Summit County’s Neighborhood Overlay Zone Type I Primary Residence for Non-OWTS Single Family and Manufactured Home STR impacts for up to six (6) bedrooms, including people and flow allocations, allowances, and increases in flow (and associated loading) are shown in Table 3.



Table 3. Summit County's Neighborhood Overlay Zone Type I Primary Residence STR for Non-OWTS Single Family and Manufactured Homes STR Impact Summary

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
No. of Bedrooms	No. of Bathrooms	Designated as Non-STR					Designated as STR					Non-STR Service Fee Compared to STR Service Fee					
		Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)	Calculated SFE	Allowed Occupancy (people)	Projected Flow (gpd)	Flow Increase (gpd)	Flow Change Impact (%)	Non-STR Designated Service Fee	Projected Annual Service Fee (Based on Population)	Change in Annual Service Fee	Service Fee Change (%)	Annual Capital Charge (25-Year Cost Recovery)	Total Annual Charge (Service Fee + Capital Charge)
1	<=2	1	0	1.0	3.5	300	1.14	4	343	43	14%	\$348	\$398	\$50	14%	\$78	\$475
2	<=2	1	0	1.0	3.5	300	2.14	7.5	643	343	114%	\$348	\$746	\$398	114%	\$621	\$1,367
3	<=2	1	0	1.0	3.5	300	2.29	8	686	386	129%	\$348	\$795	\$447	129%	\$699	\$1,494
4	<=2	1.4	0	1.4	4.9	420	2.86	10	857	437	104%	\$487	\$994	\$507	104%	\$792	\$1,786
5	<=2	1.8	0	1.8	6.3	540	3.43	12	1,028	488	90%	\$626	\$1,193	\$567	90%	\$885	\$2,078
6	<=2	2.2	0	2.2	7.7	660	4.00	14	1,200	540	82%	\$766	\$1,392	\$626	82%	\$978	\$2,370
2	3	1	0.2	1.2	4.2	360	2.14	7.5	643	283	79%	\$418	\$746	\$328	79%	\$512	\$1,258
3	3	1	0.2	1.2	4.2	360	2.29	8	686	326	90%	\$418	\$795	\$378	90%	\$590	\$1,385
4	3	1.4	0.2	1.6	5.6	480	2.86	10	857	377	79%	\$557	\$994	\$437	79%	\$683	\$1,677
5	3	1.8	0.2	2.0	7.0	600	3.43	12	1,028	429	71%	\$696	\$1,193	\$497	71%	\$776	\$1,969
6	3	2.2	0.2	2.4	8.4	720	4.00	14	1,200	480	67%	\$835	\$1,392	\$557	67%	\$869	\$2,261
2	4	1	0.4	1.4	4.9	420	2.14	7.5	643	\$223	\$1	\$487	\$746	\$259	53%	\$404	\$1,149
3	4	1	0.4	1.4	4.9	420	2.29	8	686	266	63%	\$487	\$795	\$308	63%	\$481	\$1,277
4	4	1.4	0.4	1.8	6.3	540	2.86	10	857	317	59%	\$626	\$994	\$368	59%	\$574	\$1,569
5	4	1.8	0.4	2.2	7.7	660	3.43	12	1,028	369	56%	\$766	\$1,193	\$428	56%	\$668	\$1,861
6	4	2.2	0.4	2.6	9.1	780	4.00	14	1,200	420	54%	\$905	\$1,392	\$487	54%	\$761	\$2,153

- Notes:
- Columns A through G from Table 1.
 - Calculated SFE (Column H) = Column I x 3.5 people per SFE.
 - Allowed Occupancy (Column I) from Summit County Ordinance with maximum 50% room rented when Owner is on premises (e.g., 3 bedroom may only rent 1 bedroom and 5 bedroom may only rent 2 bedroom when owner present). Owner allocation is 3.5 people.
 - Projected Flow (Column J) = Column I x 85.7 gpcpd.
 - Flow Increase (Column K) = Column J – Column G
 - Flow (and associated loading) Change Impact (Column L) = Column K / Column G
 - Non-STR Designated Service Fee (Column M) = Column E x \$336 per SFE per year.
 - Projected Annual Service Fee (Column N) = (Column I / Column F) * \$336 per SFE per year.
 - Change in Annual Service Fee (Column O) = Column N – Column M.
 - Service Fee Change (%) (Column P) = Column O / Column M.
 - Annual Capital Charge (25-Year Cost Recovery) (Column Q) = 1/300 * \$13,584 per SFE *12 months * (Column H – Column E).
 - Total Annual Charge (Service Fee + Capital Charge) (Column R) = Column N + Column Q.
 - All possible combinations of bedrooms and bathrooms that exist in the District are not shown.



A summary of Summit County’s Neighborhood Overlay Zone Type II STR for Non-OWTS Single Family and Manufactured Home STR impacts for up to six (6) bedrooms, including people and flow allocations, allowances, and increases in flow (and associated loading) are shown in Table 4.



Table 4. Summit County's Neighborhood Overlay Zone Type II STR for Non-OWTS Single Family and Manufactured Homes STR Impact Summary

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
No. of Bedrooms	No. of Bathrooms	Designated as Non-STR					Designated as STR					Non-STR Service Fee Compared to STR Service Fee					
		Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)	Calculated SFE	Allowed Occupancy (people)	Projected Flow (gpd)	Flow Increase (gpd)	Flow Change Impact (%)	Non-STR Designated Service Fee	Projected Annual Service Fee (Based on Population)	Change in Annual Service Fee	Service Fee Change (%)	Annual Capital Charge (25-Year Cost Recovery)	Total Annual Charge (Service Fee + Capital Charge)
1	<=1	1	0	1.0	3.5	300	1.14	4	343	43	14%	\$348	\$398	\$50	14%	\$78	\$475
2	<=1	1	0	1.0	3.5	300	1.71	6	514	214	71%	\$348	\$597	\$249	71%	\$388	\$985
3	<=1	1	0	1.0	3.5	300	2.29	8	686	386	129%	\$348	\$795	\$447	129%	\$699	\$1,494
4	<=1	1.4	0	1.4	4.9	420	2.86	10	857	437	104%	\$487	\$994	\$507	104%	\$792	\$1,786
5	<=1	1.8	0	1.8	6.3	540	3.43	12	1028	488	90%	\$626	\$1,193	\$567	90%	\$885	\$2,078
6	<=1	2.2	0	2.2	7.7	660	4.00	14	1200	540	82%	\$766	\$1,392	\$626	82%	\$978	\$2,370
2	2	1	0.2	1.2	4.2	360	1.71	6	514	154	43%	\$418	\$597	\$179	43%	\$279	\$876
3	2	1	0.2	1.2	4.2	360	2.29	8	686	326	90%	\$418	\$795	\$378	90%	\$590	\$1,385
4	2	1.4	0.2	1.6	5.6	480	2.86	10	857	377	79%	\$557	\$994	\$437	79%	\$683	\$1,677
5	2	1.8	0.2	2.0	7.0	600	3.43	12	1,028	429	71%	\$696	\$1,193	\$497	71%	\$776	\$1,969
6	2	2.2	0.2	2.4	8.4	720	4.00	14	1,200	480	67%	\$835	\$1,392	\$557	67%	\$869	\$2,261
3	3	1	0.4	1.4	4.9	420	2.29	8	686	266	63%	\$487	\$795	\$308	63%	\$481	\$1,277
4	3	1.4	0.4	1.8	6.3	540	2.86	10	857	317	59%	\$626	\$994	\$368	59%	\$574	\$1,569
5	3	1.8	0.4	2.2	7.7	660	3.43	12	1,028	369	56%	\$766	\$1,193	\$428	56%	\$668	\$1,861
6	3	2.2	0.4	2.6	9.1	780	4.00	14	1,200	420	54%	\$905	\$1,392	\$487	54%	\$761	\$2,153

Notes:

- Columns A through G from Table 1.
- Calculated SFE (Column H) = Column I x 3.5 people per SFE.
- Allowed Occupancy (Column I) from Summit County.
- Projected Flow (Column J) = Column I x 85.7 gpcpd.
- Flow Increase (Column K) = Column J – Column G
- Flow (and associated loading) Change Impact (Column L) = Column K / Column G
- Non-STR Designated Service Fee (Column M) = Column E x \$336 per SFE per year.
- Projected Annual Service Fee (Column N) = (Column I / Column F) * \$336 per SFE per year.
- Change in Annual Service Fee (Column O) = Column N – Column M.
- Service Fee Change (%) (Column P) = Column O / Column M.
- Annual Capital Charge (25-Year Cost Recovery) (Column Q) = 1/300 * \$13,584 per SFE *12 months * (Column H – Column E).
- Total Annual Charge (Service Fee + Capital Charge) (Column R) = Column N + Column Q.
- All possible combinations of bedrooms and bathrooms that exist in the District are not shown.



The projected flow (and associated loading) for STR occupancy for each category in the Summit County Resort and Neighborhood Overlay Zones are shown in Table No.'s 2 through 4. A summary of findings include:

- Properties have an increased flow (and associated loading) impact compared to the District allocation due to the increase in number of people permitted at the STR.
- Projected flow (and associated loading) increases indicate that the District may be undercharging STR customers based on permitted increased STR occupancies.
- Projected flow (and associated loading) decreases indicate that the District may be overcharging STR customers based on permitted increased STR occupancies.



Town of Blue River

A comparison between the District's Rules and Regulations and the Town of Blue River's Municipal Code regarding STRs includes the following observations:

- STR is defined as rentals for periods of time less than 30-days and does not include hotels or motels.
- The Blue River license expires at the end of the calendar year whether rented or not.
- The maximum occupancy is *"...two (2) persons for each bedroom...plus a total of two (2) additional persons."* The allowable maximum STR occupancy for a three (3) bedroom unit is eight (8) people.

A summary of the Town of Blue River's Single-Family Residence and Manufactured Home STR impacts, for up to six (6) bedrooms, including people and flow allocations, allowances, and increases in flow (and associated loading) is shown in Table 5.



Table 5. Town of Blue River Single-Family Residences and Manufactured Homes STR Impact Summary

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
No. of Bedrooms	No. of Bathrooms	Designated as Non-STR					Designated as STR					Non-STR Service Fee Compared to STR Service Fee					
		Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)	Calculated SFE	Allowed Occupancy (people)	Projected Flow (gpd)	Flow Increase (gpd)	Flow Change Impact (%)	Non-STR Designated Service Fee	Projected Annual Service Fee (Based on Population)	Change in Annual Service Fee	Service Fee Change (%)	Annual Capital Charge (25-Year Cost Recovery)	Total Annual Charge (Service Fee + Capital Charge)
1	<=1	1	0	1.0	3.5	300	1.14	4	343	43	14%	\$348	\$398	\$50	14%	\$78	\$475
2	<=1	1	0	1.0	3.5	300	1.71	6	514	214	71%	\$348	\$597	\$249	71%	\$388	\$985
3	<=1	1	0	1.0	3.5	300	2.29	8	686	386	129%	\$348	\$795	\$447	129%	\$699	\$1,494
4	<=1	1.4	0	1.4	4.9	420	2.86	10	857	437	104%	\$487	\$994	\$507	104%	\$792	\$1,786
5	<=1	1.8	0	1.8	6.3	540	3.43	12	1,028	488	90%	\$626	\$1,193	\$567	90%	\$885	\$2,078
6	<=1	2.2	0	2.2	7.7	660	4.00	14	1,200	540	82%	\$766	\$1,392	\$626	82%	\$978	\$2,370
2	2	1	0.2	1.2	4.2	360	1.71	6	514	154	43%	\$418	\$597	\$179	43%	\$279	\$876
3	2	1	0.2	1.2	4.2	360	2.29	8	686	326	90%	\$418	\$795	\$378	90%	\$590	\$1,385
4	2	1.4	0.2	1.6	5.6	480	2.86	10	857	377	79%	\$557	\$994	\$437	79%	\$683	\$1,677
5	2	1.8	0.2	2.0	7.0	600	3.43	12	1,028	429	71%	\$696	\$1,193	\$497	71%	\$776	\$1,969
6	2	2.2	0.2	2.4	8.4	720	4.00	14	1,200	480	67%	\$835	\$1,392	\$557	67%	\$869	\$2,261
3	3	1	0.4	1.4	4.9	420	2.29	8	686	266	63%	\$487	\$795	\$308	63%	\$481	\$1,277
4	3	1.4	0.4	1.8	6.3	540	2.86	10	857	317	59%	\$626	\$994	\$368	59%	\$574	\$1,569
5	3	1.8	0.4	2.2	7.7	660	3.43	12	1,028	369	56%	\$766	\$1,193	\$428	56%	\$668	\$1,861
6	3	2.2	0.4	2.6	9.1	780	4.00	14	1,200	420	54%	\$905	\$1,392	\$487	54%	\$761	\$2,153

Notes:

- Columns A through G from Table 1.
- Calculated SFE (Column H) = Column I x 3.5 people per SFE.
- Allowed Occupancy (Column I) from the Town of Blue River's Municipal Code.
- Projected Flow (Column J) = Column I x 85.7 gpcpd.
- Flow Increase (Column K) = Column J - Column G.
- Flow (and associated loading) Change Impact (Column L) = Column K / Column G.
- Non-STR Designated Service Fee (Column M) = Column E x \$336 per SFE per year.
- Projected Annual Service Fee (Column N) = (Column I / Column F) * \$336 per SFE per year.
- Change in Annual Service Fee (Column O) = Column N - Column M.
- Service Fee Change (%) (Column P) = Column O / Column M.
- Annual Capital Charge (25-Year Cost Recovery) (Column Q) = 1/300 * \$13,584 per SFE * 12 months * (Column H - Column E).
- Total Annual Charge (Service Fee + Capital Charge) (Column R) = Column N + Column Q.
- All possible combinations of bedrooms and bathrooms that exist in the District are not shown.



The projected flow (and associated loading) for STR occupancy for each category in the Town of Blue River is shown in Table No. 5. A summary of findings include:

- Properties have an increased flow (and associated loading) compared to the District allocation due to the increase in number of people permitted at the STR.
- Projected flow (and associated loading) increases indicate that the District may be undercharging STR customers based on permitted increased STR occupancies.
- Projected flow (and associated loading) decreases indicate that the District may be overcharging STR customers based on permitted increased STR occupancies.



Town of Breckenridge

A comparison between the District's Rules and Regulations and the Town of Breckenridge's Town Code regarding STRs includes the following observations:

- STR is defined as rentals for periods of time less than 30-days and does not include hotels or motels.
- The Breckenridge license expires at the end of the calendar year whether rented or not; unless the annual accommodation fee of \$400 per studio and/or per bedroom is not paid.

The annual accommodation fee is not required where the accommodation unit is the applicant's primary residence and is rented out for less than 21-days total per year. The District does not monitor unit occupancy (e.g., on a daily or monthly basis) and will charge the STR fee to the customer as if the unit is an STR for the entire year.

The annual accommodation fee requirement waiver for primary residences rented out less than 21-days indicates that the property continues to be considered a STR but is not required to pay the accommodation fee. The District considers this type of unit as a STR; does not monitor occupancy on a daily or monthly basis; and will charge the STR fee to the customer as if the unit is an STR for the entire year.

The District's facilities are designed to handle the greater peak daily flow that results for STRs regardless of the number of rental days. As a result, a reduction in fees for facilities that rent out for less than 21-days per year is not recommended as the District designs, constructs, operates, and maintains its facilities for peak daily flow and loadings to provide reliable service to its customers.

- The maximum occupancy for non-studios is *"...two (2) persons per bedroom plus four (4) additional persons."*

A summary of the Town of Breckenridge's Non-Studio Single-Family Residence and Manufactured Home STR impacts, for up to six (6) bedrooms, including people and flow allocations, allowances, and increases in flow (and associated loading) is shown in Table 6.



Table 6. Town of Breckenridge Non-Studio Single-Family Residences and Manufactured Homes STR Impact Summary

A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R
No. of Bedrooms	No. of Bathrooms	Designated as Non-STR					Designated as STR					Non-STR Service Fee Compared to STR Service Fee					
		Bedroom SFE Allocation	Bathroom SFE Allocation	Total SFE Allocation	Allocated Occupancy (people)	Allocated Flow (gpd)	Calculated SFE	Allowed Occupancy (people)	Projected Flow (gpd)	Flow Increase (gpd)	Flow Change Impact (%)	Non-STR Designated Service Fee	Projected Annual Service Fee (Based on SFE Allocation / Population)	Change in Annual Service Fee	Service Fee Change (%)	Annual Capital Charge (25-Year Cost Recovery)	Total Annual Charge (Service Fee + Capital Charge)
1	<=1	1	0	1.0	3.5	300	1.71	6	514	214	71%	\$348	\$597	\$249	71%	\$388	\$985
2	<=1	1	0	1.0	3.5	300	2.29	8	686	386	129%	\$348	\$795	\$447	129%	\$699	\$1,494
3	<=1	1	0	1.0	3.5	300	2.86	10	857	557	186%	\$348	\$994	\$646	186%	\$1,009	\$2,003
4	<=1	1.4	0	1.4	4.9	420	3.43	12	1,028	608	145%	\$487	\$1,193	\$706	145%	\$1,102	\$2,295
5	<=1	1.8	0	1.8	6.3	540	4.00	14	1,200	660	122%	\$626	\$1,392	\$766	122%	\$1,195	\$2,587
6	<=1	2.2	0	2.2	7.7	660	4.57	16	1,371	711	108%	\$766	\$1,591	\$825	108%	\$1,289	\$2,879
2	2	1	0.2	1.2	4.2	360	2.29	8	686	326	90%	\$403	\$768	\$365	90%	\$590	\$1,358
3	2	1	0.2	1.2	4.2	360	2.86	10	857	497	138%	\$403	\$960	\$557	138%	\$900	\$1,860
4	2	1.4	0.2	1.6	5.6	480	3.43	12	1,028	548	114%	\$538	\$1,152	\$614	114%	\$994	\$2,146
5	2	1.8	0.2	2.0	7.0	600	4.00	14	1,200	600	100%	\$672	\$1,344	\$672	100%	\$1,087	\$2,431
6	2	2.2	0.2	2.4	8.4	720	4.57	16	1,371	651	90%	\$806	\$1,536	\$730	90%	\$1,180	\$2,716
3	3	1	0.4	1.4	4.9	420	2.86	10	857	437	104%	\$487	\$994	\$507	104%	\$792	\$1,786
4	3	1.4	0.4	1.8	6.3	540	3.43	12	1,028	488	90%	\$626	\$1,193	\$567	90%	\$885	\$2,078
5	3	1.8	0.4	2.2	7.7	660	4.00	14	1,200	540	82%	\$766	\$1,392	\$626	82%	\$978	\$2,370
6	3	2.2	0.4	2.6	9.1	780	4.57	16	1,371	591	76%	\$905	\$1,591	\$686	76%	\$1,071	\$2,662

Notes:

- Columns A through G from Table 1.
- Calculated SFE (Column H) = Column I x 3.5 people per SFE.
- Allowed Occupancy (Column I) from Town of Breckenridge Town Code.
- Projected Flow (Column J) = Column I x 85.7 gpcpd.
- Flow Increase (Column K) = Column J – Column G.
- Flow (and associated loading) Change Impact (Column L) = Column K / Column G.
- Non-STR Designated Service Fee (Column M) = Column E x \$336 per SFE per year.
- Projected Annual Service Fee (Column N) = (Column I / Column F) * \$336 per SFE per year.
- Change in Annual Service Fee (Column O) = Column N – Column M.
- Service Fee Change (%) (Column P) = Column O / Column M.
- Annual Capital Charge (25-Year Cost Recovery) (Column Q) = 1/300 * \$13,584 per SFE *12 months * (Column H – Column E).
- Total Annual Charge (Service Fee + Capital Charge) (Column R) = Column N + Column Q.
- All possible combinations of bedrooms and bathrooms that exist in the District are not shown.



The projected flow (and associated loading) for STR occupancy for each category in the Town of Breckenridge is shown in Table No. 6. A summary of findings include:

- Properties have an associated increased flow (and associated loading) impact compared to the District allocation due to the increase in number of people permitted at the STR.
- Projected flow (and associated loading) increases indicate that the District may be undercharging STR customers based on permitted increased STR occupancies.
- Projected flow (and associated loading) decreases indicate that the District may be overcharging STR customers based on permitted increased STR occupancies.

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