

## **Comments on February 28 MPC agenda items, received through February 22**

### **Item 6: 2018SP-084-001 – West Trinity Lane SP**

**From:** Elise Hudson [mailto:elise@elisehudson.com]

**Sent:** Thursday, February 14, 2019 6:23 PM

**To:** Planning Commissioners

**Subject:** Thank You

Thank you so much for listening to the community folks tonight and deferring the West Trinity SP for one meeting so that your Planning hearing can be held after the posted community meeting.

I know that what you do is sometimes a thankless job, but please know that you are very much appreciated. The Planning Commission is so valuable to the members of our neighborhoods as a line of defense against irresponsible development, and we are very glad that you look out for all the communities of Nashville. And most of you do it as unpaid volunteers, which is still amazing to me. Thank you.

Very sincerely,

Elise Hudson  
4601 Whites Creek Pike  
Whites Creek, TN 37189  
(615)557-4695

## Item 12: 2018S-204-001 – Hunters Run

**From:** Elise Hudson [mailto:elise@elisehudson.com]  
**Sent:** Thursday, February 14, 2019 2:47 PM  
**To:** Planning Commissioners; Haywood, Brenda (Council Member)  
**Subject:** Oppose Hunters Run Development

Dear commissioners,

I know that the public hearing on Hunters Run is set to be postponed until later this month, but I wanted to voice my opposition to the development on several grounds:

1. The development is clearly in contradiction to the T2 Rural Maintenance policy that the neighborhood established as part of Nashville Next.
2. The development is clearly not harmonious to the surrounding areas. The surrounding neighborhood includes Bella Vista and Dalemere - not just the new proposed roads.
3. There are serious stormwater concerns with the development adding to an existing problem of flooding along Old Hickory Blvd and even down as far as Whites Creek (Little Creek feeds into the Whites Creek area and watershed).
4. There is clearly a lack of connectivity in the proposal, which does not have any entrances along Hunters Lane and proposes only feeding into smaller roads where there are existing very low traffic streets today.
5. Cluster lot options should not be allowed on T2 policy lands - especially T2 Rural Maintenance. This proposal claims a large area of "open space," but the open space is unusable and not sufficient to meet the definitions of open space as defined in the subdivision regulations.
6. Allowing this development would negate the intent of the Nashville Next Rural Maintenance policy AND would set a very dangerous precedent for developers to ignore policy in other areas of North and West Nashville that were strategically intended as rural character, policy, and areas where change should be limited as part of Nashville Next.

Please oppose this concept plan.

Thank you,

Elise Hudson  
4601 Whites Creek Pike  
Whites Creek, TN 37189  
(615)557-4695

## Item 20: 2018SP-008-001 – 945 South Douglas

**From:** Moira Tomaso [<mailto:motomaso@me.com>]

**Sent:** Thursday, January 03, 2019 12:41 PM

**To:** Rickoff, Abbie (Planning)

**Subject:** Case 2018SP-008-001

Dear Ms. Rickoff,

I reside on the 900 block of S Douglas Ave and I just wanted to share my concerns about the zoning and redevelopment plan for the Pilgrim Emanuel Baptist Church. I will be unable to attend the zoning meeting for 945 S Douglas Ave.

### **Direct Street Access**

My greatest concern, by far, is that the current request does not allow for access from the street (S Douglas) but only alley access.

This forces 38+ vehicles down a narrow alley that contains a 90 degree turn and has very limited sight lines.

I strongly encourage you to require the developer to keep the driveway entrance on S Douglas (or in the new plan to extend the alley) along the property edge of 937 S Douglas, even if it would necessitate in one less unit in the development.

Alley access

The alley is narrow. It is not clear from the plan exactly how improvements will be made to the alley from 10th to the development entrance. In it's current configuration emergency vehicles would have difficulty servicing the property from the alley. Please be sure that improvements support emergency vehicle access to the development.

Parking

8 spots is not a lot of visitor/overflow parking, especially given that all the homes have closed garages with no driveway parking space available. If more parking can't be added, please be sure that appropriate No Parking signage is installed on 10th and S Douglas with respect to the curve/corner—it is already a confusing and unusual intersection. Occasionally vehicles are parked along the curve and it's very dangerous.

Trees

The redevelopment plan will eliminate a number of trees. Please require the developer to install a reasonable number of trees of appropriate size and species.

Thank you for your consideration,

Moira & Stephen Tomaso

929A S Douglas Ave

Nashville, TN 37204

## Item 24: 2018NHL-003-002 – 819 and 901 Russell Street

**From:** Ashlyn Scott [mailto:ashlyn.l.scott@gmail.com]

**Sent:** Friday, February 22, 2019 9:15 AM

**To:** Withers, Brett (Council Member)

**Subject:** Additional Rooms- 819 Russell Street

Dear Councilman Withers and Members of the Planning Commission-

First of all, thanks for your service to our great city. I wanted to write you a quick note of support for the addition of 5 new rooms on the 3rd floor of the boutique hotel project at 819 Russell St.

I live on Riverside Drive in East Nashville and I am really excited about what this project will bring to our neighborhood. The owners have done a beautiful job with the building restoration thus far and I'm excited to see the finished project. It is going to be an addition to the East side, that will make an impact in our community. I wanted to let you know that I am in full support of this project and look forward to seeing it approved on February 28th.

Thanks for all you do,

Ashlyn Scott

615.354.3619

## Emails on other topics:

**From:** Omid Yamini [mailto:omid1130@gmail.com]

**Sent:** Tuesday, February 19, 2019 8:39 AM

**To:** Council Members

**Cc:** Planning Commissioners; Board of Zoning Appeals (Codes); Mayor (Mayor's Office); Briley, David (Mayor)

**Subject:** NYC Subpoenas Airbnb, what are we doing in Nashville? Please SUPPORT BL2018-1455

Council Members,

I wanted to share some information with you about what's going on in NYC's continued war on illegal STRs, as the headline reads: "NYC Subpoenas Airbnb for Info on About 20,000 Apartment Listings."

<https://www.ny1.com/nyc/all-boroughs/politics/2019/02/19/nyc-subpoenas-airbnb-for-information-on-apartment-listings>

I can already hear one CM's response in my head echoing from the STR Committee meetings of 2017.... "They'll just go underground... look at what happened in NYC".

Well, my response to that would be: Is our solution to any/all illegal activity to go ahead and legitimize it since it might just 'go underground'? Or do we stand up to illegal activity and deal with it, like NYC is?

As has been said countless times by countless people: our city has a housing crisis. Any housing that is being taken off the market to be used as STRs (defacto-hotels) has an impact on this.

Please support CM Sledge's bill BL2018-1455 before you tonight, it's another small step in the right direction.

Thanks,

Omid Yamini

1204 N. 2nd St.

Nashville, TN. 37207

**From:** G. Renshaw [mailto:grenshaw55@gmail.com]  
**Sent:** Tuesday, February 19, 2019 2:53 PM  
**To:** Council Members  
**Cc:** mayor.briley@nashville.gov; Shulman, Jim (Vice Mayor); Planning Commissioners  
**Subject:** STR Platforms should not be allowed to ignore taxes and regulations

Dear Council:

The Economic Policy Institute has published some helpful policy analysis re: short-term rental platforms that their small army of national, state and local lobbyists probably haven't shared with you. A major takeaways:

- **"The economic costs Airbnb imposes likely outweigh the benefits."**
- **"Rising housing costs are a key problem...and evidence suggests that the presence of Airbnb raises local housing costs."**
- **"Property owners do benefit from Airbnb's capacity to lower the transaction costs of operating STRs, but the beneficiaries are disproportionately white and high-wealth households."**
- **"The shift from traditional hotels to Airbnb lodging leads to less-reliable tax payments to cities."**

Below is a link to the article with the summary pasted in. Please make responsible decisions for Nashville that protect local homeowners and residents rather than favoring out-of-state property investors.

Thanks and regards -

Grace Renshaw  
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615-322-4594

<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/?fbclid=IwAR09PNdI5aNgtW7dIv0MosBHcOWpknTWdquMk6gvxfZNgfckXRHdlvo3COU>

## Summary

"The sharing economy" refers to a constellation of (mostly) Silicon Valley-based companies that use the internet as their primary interface with consumers as they sell or rent services. Because this term is "vague and may be a marketing strategy" (AP 2019), we refer to these firms less poetically but more precisely as "internet-based service firms" (IBSFs).

Economic policy discussions about IBSFs have become quite heated and are too often engaged at high levels of abstraction. To their proponents, IBSFs are using technological advances to bring needed innovation to stagnant sectors of the economy, increasing the quality of goods and services, and providing typical American families with more options for earning income; these features are often cited as reasons why IBSFs should be excused from the rules and regulations applying to their more traditional competitors. To skeptics, IBSFs mostly represent attempts by rich capital owners and venture capitalists to profit by flouting regulations and disguising their actions as innovation.

The debates about whether and how to regulate IBSFs often involve theories about their economic costs and benefits. This report aims to inform the debate by testing those theories. Specifically, it assesses the potential economic costs and benefits of the expansion of one of the most well-known of the IBSFs: the rental business Airbnb.

Airbnb, founded in 2008, makes money by charging guests and hosts for short-term rental stays in private homes or apartments booked through the Airbnb website. It started in prototype in San Francisco and expanded rapidly, and is now operating in hundreds of cities around the world. Airbnb is frequently depicted as a boon for travelers looking for lower-cost or nontraditional accommodations, and for homeowners looking to expand their income stream. But in many local markets, the arrival and expansion of Airbnb is raising questions about its potential negative impacts on local housing costs, quality of life in residential neighborhoods, employment quality in the hospitality industry, and local governments' ability to enforce municipal codes and collect appropriate taxes.

In our cost-benefit analysis, we find:

- **The economic costs Airbnb imposes likely outweigh the benefits.** While the introduction and expansion of Airbnb into U.S. cities and cities around the world carries large potential economic benefits and costs, the costs to renters and local jurisdictions likely exceed the benefits to travelers and property owners.
- **Airbnb might, as claimed, suppress the growth of travel accommodation costs, but these costs are not a first-order problem for American families.** The largest and best-documented potential benefit of Airbnb expansion is the increased supply of travel accommodations, which could benefit travelers by making travel more affordable. There is evidence that Airbnb increases the supply of short-term travel accommodations and slightly lowers prices. But there is little evidence that the high price of travel accommodations is a pressing economic problem in the United States: The price of travel accommodations in the U.S. has not risen particularly fast in recent years, nor are travel costs a significant share of American family budgets.
- **Rising housing costs are a key problem for American families, and evidence suggests that the presence of Airbnb raises local housing costs.** The largest and best-documented potential cost of Airbnb expansion is the reduced supply of housing as properties shift from serving local residents to serving Airbnb travelers, which hurts local residents by raising housing costs. There is evidence this cost is real:
  - Because housing demand is relatively inelastic (people's demand for somewhere to live doesn't decline when prices increase), even small changes in housing supply (like those caused by converting long-term rental properties to Airbnb units) can cause significant price increases. High-quality studies indicate that Airbnb introduction and expansion in New York City, for example, may have raised average rents by nearly \$400 annually for city residents.
  - The rising cost of housing is a key problem for American families. Housing costs have risen significantly faster than overall prices (and the price of short-term travel accommodations) since 2000, and housing accounts for a significant share (more than 15 percent) of overall household consumption expenditures.

**The potential benefit of increased tourism supporting city economies is much smaller than commonly advertised.** There is little evidence that cities with an increasing supply of short-term Airbnb rental accommodations are seeing a large increase in travelers. Instead, accommodations supplied via Airbnb seem to be a nearly pure substitution for other forms of accommodation. Two surveys indicate that only 2 to 4 percent of those using Airbnb say that they would not have taken the trip were Airbnb rentals unavailable.

- Studies claiming that Airbnb is supporting a lot of economic activity often vastly overstate the effect because they fail to account for the fact that much of this spending would have been done anyway by travelers staying in hotels or other alternative accommodations absent the Airbnb option.

**Property owners do benefit from Airbnb’s capacity to lower the transaction costs of operating short-term rentals, but the beneficiaries are disproportionately white and high-wealth households.** Wealth from property ownership is skewed, with higher-wealth and white households holding a disproportionate share of housing wealth overall—and an even more disproportionate share of housing wealth from nonprimary residences because they are much more likely to own nonprimary residential property (such as multi-unit Airbnb rentals).

**The shift from traditional hotels to Airbnb lodging leads to less-reliable tax payments to cities.** Several large American cities with a large Airbnb presence rely heavily on lodging taxes. Airbnb has largely blocked the ability of these cities to transparently collect lodging taxes on Airbnb rentals that are equivalent to lodging taxes on hotel rooms. One study found that the voluntary agreements Airbnb has struck with state and local governments “[undermine] tax fairness, transparency, and the rule of law.”

**City residents likely suffer when Airbnb circumvents zoning laws that ban lodging businesses from residential neighborhoods.** The status quo of zoning regulations in cities reflects a broad presumption that short-term travelers likely impose greater externalities on long-term residents than do other long-term residents. Externalities are economic costs that are borne by people not directly engaged in a transaction. In the case of neighbors on a street with short-term renters, externalities include noise and stress on neighborhood infrastructure like trash pickup. These externalities are why hotels are clustered away from residential areas. Many Airbnb rental units are in violation of local zoning regulations, and there is the strong possibility that these units are indeed imposing large costs on neighbors.

**Because Airbnb is clearly a business competing with hotel lodging, it should be subject to the same taxation regime as hotels.** In regard to zoning regulations, there is no empirical evidence that the net benefits of Airbnb introduction and expansion are so large that policymakers should reverse long-standing regulatory decisions simply to accommodate the rise of a single company.

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