



Agenda

Economic Development Advisory Commission Worksession

Tuesday, August 25, 2026 at 5:00 PM

City Hall Cowles Council Chambers In-Person & Via Zoom Webinar

Homer City Hall

491 E. Pioneer Avenue
Homer, Alaska 99603
www.cityofhomer-ak.gov

Zoom Webinar ID: 205 093 973 Password: 610853

<https://cityofhomer.zoom.us>
Dial: 346-248-7799 or 669-900-6833;
(Toll Free) 888-788-0099 or 877-853-5247

CALL TO ORDER 5:00 P.M.

AGENDA APPROVAL

- [A.](#) EDC Worksession Agenda

DISCUSSION TOPIC(S)

- [A.](#) Short Term Rentals-Action Memorandum
- [B.](#) Resolution 26-028(A)
- [C.](#) Baily Letter

COMMENTS OF THE AUDIENCE (3 minute time limit)

ADJOURNMENT

Next Regular Meeting is **Tuesday, September 8th, at 6 p.m.** All meetings scheduled to be held in the City Hall Cowles Council Chambers located at 491 E. Pioneer Avenue, Homer, Alaska and via Zoom Webinar.



Agenda

Economic Development Advisory Commission Worksession

Tuesday, August 11, 2026 at 5:00 PM

City Hall Cowles Council Chambers In-Person & Via Zoom Webinar

Homer City Hall

491 E. Pioneer Avenue
Homer, Alaska 99603
www.cityofhomer-ak.gov

Zoom Webinar ID: 990 0366 1092 Password: 725933

<https://cityofhomer.zoom.us>
Dial: 346-248-7799 or 669-900-6833;
(Toll Free) 888-788-0099 or 877-853-5247

CALL TO ORDER, 5:00 P.M.

AGENDA APPROVAL

DISCUSSION TOPIC(S)/PRESENTATION(S)

- A. Short Term Rentals
- B. CIP

COMMENTS OF THE AUDIENCE (3 minute time limit)

ADJOURNMENT



MEMORANDUM

Short Term Rentals

Item Type: Action Memorandum
Prepared For: Economic Development Advisory Commission
Date: August 20, 2026
From: Julie Engebretsen, Community Development Director

Purpose

The purpose of this work session is to identify areas of agreement and disagreement regarding short-term rental policy and to establish a process for addressing issues that remain unresolved.

Work Session Process

1. **Check support for STR registration.** Each commissioner will briefly state whether they support a short-term rental registration system and explain why. The Commission will then identify any areas of agreement.
2. **Review the Council's questions and supporting information.** Commissioner Noomah prepared a brief review of possible responses. This discussion will help staff prepare the final report.
3. **Discuss possible short- and long-term City actions, if time allows.** The discussion will build on the options beginning on page 11 of the prior packet. Shortened versions are included in this packet to support a focused discussion.

Desired Outcomes

- Identify a limited number of short-term actions the City could consider.
- Identify a limited number of long-term actions the City could consider.
- Document areas of agreement and disagreement.
- Determine how unresolved issues will be addressed or noted in the Commission's recommendations.

Next Steps

At the September meeting, the Commission will review what to include in its recommendations to the City Council. Final report amendments and approval will occur in October.

ATTACHMENTS:

1. Draft STR registration in Title 21
2. Commissioner Noomah's memo and AHFC rental data
3. Potential short-term and long-term actions for the City

Chapter 21.51 Short-Term Rentals

21.51.010 Purpose.

The purpose of this section is to establish rules, regulations, and limitations on housing arrangements which are typically an alternative to traditional lodging/accommodation establishments such as hotels and motels. Short-term rentals provide lodging or housing for terms less than thirty days.

21.51.020 Applicability.

The provisions of this section shall be applicable to all short-term rentals that provide accommodations for terms less than thirty days. Motels, hotels, lodges, and inns, rental cabins, and long-term residential rentals (thirty days or more) are not subject to the provisions of this section.

21.51.030 Specific Use Standards.

- a. Location. Short-term rentals may be located in any zoning district where dwelling units are a permitted or conditional use.
- b. Review. Short-term rentals shall be established through a short-term rental application and permit. The city may establish or modify a limit on the number of short-term rental permits it allows within the municipal limits, as established by resolution of the city council.
- c. Issuance. Permits will be issued and require renewal on an annual basis. During annual permit renewal period, the applicant must demonstrate that the short-term rental has been active (in both advertising and use) during the prior permit period.
- d. Types of Rental Situations. Short-term rentals may be permitted as one of the following:
 1. Dwelling Units. In these situations, a temporary tenant/guest may rent and occupy an entire dwelling unit which may include a house or apartment. These units typically possess a kitchen, bathroom, and any number of sleeping rooms. Dwelling units may have the capacity to support multiple temporary tenants.
 2. Rooms Within Dwelling Units. In these situations, individual sleeping rooms within a dwelling unit are rented/leased to temporary tenants/guests and the larger dwelling unit may be shared with the permanent resident. Rooms have limited tenant/guest capacity due to their size.
- e. Owner/Caretaker Registration. The owner shall register the name and contact information of the responsible caretakers/property manager with the city so that public safety officials can effectively respond to neighborhood complaints or safety-related events. The owner shall also post the caretaker/property manager contact information within each rental.
- f. Transferability. Short-term rental permits are for specific properties and are not transferable to any other properties. Short-term rental permits are transferable to a new owner, if the property on which the short-term rental is located changes ownership.

From Theo Noomah, 8/19/26
Responses to Council's Questions

1. Gather input from a range of local perspectives, including residents, renters, employers, STR hosts, and others affected by seasonal housing dynamics; (EDC Actions italicized in addition to speakers, above)

Done

2. Develop a general understanding of STR activity in Homer, including approximate numbers, general distribution, and seasonal patterns of use; (Action needed: Synthesize response from speakers and documents provided)

The survey of listings by Young and the Board of Realtors gives a approximate numbers and some aspects of general distribution (in town/out of town and up-market/down-market).

We all understand that demand is highest in the summer, but there is no data to help us quantify seasonal patterns of use.

3. Consider how housing availability changes throughout the year, particularly during peak summer months, and how STRs may or may not contribute to those changes; (use KPEDD, Kachemak Board of Realtors info, June speakers by August meeting)

There is no data to help us quantify housing availability changes throughout the year. There is data that shows that, year-round or even off-peak, Homer's rental market is tight.

4. Review examples of STR approaches used in other Alaska and comparable communities, and consider which elements, if any, may be relevant to Homer (the attached AI-assisted summary of other communities' approaches may be helpful in this regard); (AI- generated STR report from resolution, current and old Wasilla codes as examples and information from prior work <https://www.cityofhomer-ak.gov/communitydevelopment/short-term-rentals>)

We should be doing more of this.

5. Consider potential effects of STR activity and potential policy responses on housing availability, seasonal workforce needs, local businesses, and the visitor economy; (Use KPEDD info, speaker responses, other reports by August meeting)

There are both positive and negative effects of STR activity and considering all the *potential* effects is not a good use of our time. There is no data available to determine the true net cost or benefit of STR activity in Homer. This is an empirical question that we are not fit to answer.

We could consider how the different policy actions could directionally affect potential effects of STR activity. This would require discussion of micro-economic principles that we do not usually spend time on in our discussions.

6. Consider the potential benefits, costs, and practical implications of a local STR registration approach, including whether registration numbers should be displayed in online listings or advertising, whether registration should be offered at no cost, a nominal cost, or at a level intended to recover administrative expenses, and whether a registration approach would improve the City's understanding of STR activity and support more informed decision-making; (Staff research/comment, August/September)

We can and should create estimates to help establish what fees would be needed to cover administration, but again, we are not able to empirically determine an ROI for any policy.

7. Provide to the City Council a summary of observations, key takeaways, and a small number of possible near-term steps for Council consideration; (Commission to summarize top two takeaways at each meeting; review and edit final list prior to Council submission)

We can do this.

8. Provide, if appropriate, a broader range of potential future approaches for Council discussion; (September/October meetings)

We can do this.

9. Report back to the City Council within six months. (Complete report by October EDC meeting)

Attachments

2025 and 2024 AHFC Rental Market Surveys

Unrestricted Rental Costs and Vacancy Rates 2024

All Units, Selected Boroughs, Census Areas, and Cities

SURVEY AREA	Median Rent		Number of Units		Vacancy Rate	Percentage of Units with Utilities Included in the Rent						
	Contract	Adjusted	Surveyed	Vacant		Heat	Light	Hot Water	Water	Sewer	Refuse	Snow Plowing
ANCHORAGE MUNICIPALITY*	\$1,375	\$1,531	8,209	374	4.56%	73.9%	76.2%	21.5%	43.4%	44.0%	92.3%	88.8%
	\$1,352	\$1,510	7,804	360	4.61%	73.9%	76.5%	22.5%	43.8%	44.0%	92.8%	89.5%
	\$1,595	\$1,801	348	13	3.74%	70.7%	69.8%	2.9%	28.4%	36.8%	82.5%	75.3%
BETHEL CENSUS AREA *	\$1,450	\$1,450	201	26	12.94%	83.6%	72.6%	8.5%	69.7%	65.7%	67.7%	79.1%
CHUGACH CENSUS AREA *	\$1,200	\$1,375	262	10	3.82%	78.6%	66.0%	34.4%	82.4%	82.8%	80.2%	87.4%
	\$1,200	\$1,405	186	9	4.84%	77.4%	65.6%	29.0%	93.5%	93.0%	92.5%	91.4%
FAIRBANKS NORTH STAR BOROUGH*	\$1,350	\$1,503	3,681	440	11.95%	84.9%	78.6%	16.0%	85.0%	87.9%	69.4%	66.0%
FAIRBANKS	\$1,350	\$1,482	2,928	369	12.60%	90.1%	84.9%	17.1%	90.8%	91.1%	75.1%	67.3%
	\$1,450	\$1,701	720	67	9.31%	65.3%	56.3%	11.8%	62.5%	76.7%	48.9%	62.6%
JUNEAU CITY & BOROUGH*	\$1,350	\$1,499	1,011	40	3.96%	58.1%	53.1%	18.5%	99.1%	99.3%	93.7%	85.5%
	\$1,300	\$1,500	122	6	4.92%	42.6%	25.4%	15.6%	100.0%	100.0%	98.4%	86.9%
JUNEAU	\$1,375	\$1,499	865	34	3.93%	59.1%	55.7%	19.0%	99.0%	99.2%	92.8%	84.9%
	\$1,000	\$1,164	1,197	57	4.76%	65.8%	65.4%	23.1%	86.0%	86.2%	78.5%	84.0%
KENAI PENINSULA BOROUGH *	\$1,040	\$1,347	266	9	3.38%	44.7%	39.1%	15.8%	69.5%	67.7%	66.5%	77.1%
	\$950	\$1,075	471	26	5.52%	82.0%	83.2%	24.0%	91.7%	94.3%	87.5%	88.1%
SOLDOTNA	\$1,000	\$1,148	330	17	5.15%	64.2%	67.0%	19.7%	94.5%	94.2%	86.4%	88.2%
	\$1,250	\$1,417	394	40	10.15%	65.2%	65.2%	39.8%	61.9%	60.7%	56.3%	64.2%
K-AN BOROUGH*	\$1,450	\$1,623	421	14	3.33%	76.7%	68.2%	14.7%	97.4%	97.6%	96.7%	61.5%
	\$1,250	\$1,354	1,098	39	3.55%	48.2%	46.2%	13.2%	84.9%	87.8%	79.1%	75.6%
MAT-SU BOROUGH*	\$1,238	\$1,343	152	4	2.63%	45.4%	31.6%	12.5%	75.7%	78.9%	71.7%	62.5%
	\$1,250	\$1,354	886	31	3.50%	48.6%	48.8%	11.9%	88.0%	90.4%	82.6%	77.5%
PETERSBURG & WRANGELL BOROUGHS*	\$900	\$1,128	178	14	7.87%	39.3%	27.5%	7.3%	53.4%	49.4%	52.8%	53.9%
SITKA CITY AND BOROUGH*	\$1,100	\$1,478	308	22	7.14%	35.7%	37.3%	10.4%	22.7%	12.0%	12.3%	48.7%
	\$1,325	\$1,483	17,142	1,085	6.33%	72.1%	70.7%	19.6%	63.9%	64.7%	82.3%	79.9%

*These lines show the total survey results for each Borough or Census Area.

Italics - These are sub-areas of each Borough or Census Area, and contain 100 or more survey responses. Sub-area responses are included in the respective Borough or Census Area Total.

Unrestricted Rental Costs and Vacancy Rates 2025

All Units, Selected Boroughs, Census Areas, and Cities

SURVEY AREA	Median Rent		Number of Units		Vacancy Rate	Percentage of Units with Utilities Included in the Rent					
	Contract	Adjusted	Surveyed	Vacant		Heat	Light	Hot Water	Water	Sewer	Refuse
ANCHORAGE MUNICIPALITY*	\$1,404	\$1,565	8,423	472	5.6%	74.4%	19.8%	77.1%	45.2%	45.0%	92.3%
ANCHORAGE	\$1,390	\$1,557	8,028	446	5.6%	74.6%	20.6%	77.3%	45.2%	45.1%	92.6%
EAGLE RIVER	\$1,675	\$1,890	338	23	6.8%	66.9%	2.7%	70.4%	37.6%	36.4%	86.1%
BETHEL*	\$1,500	\$1,884	181	22	12.2%	85.1%	11.6%	71.3%	64.1%	68.5%	69.6%
CHUGACH CENSUS AREA*	\$1,200	\$1,375	291	18	6.2%	79.7%	33.3%	68.4%	85.2%	85.2%	82.8%
VALDEZ	\$1,200	\$1,375	195	0	0.0%	77.9%	31.3%	66.2%	93.3%	94.4%	93.3%
FAIRBANKS NORTH STAR BOROUGH*	\$1,500	\$1,643	3,544	479	13.5%	87.4%	12.7%	81.7%	89.1%	83.4%	72.9%
FAIRBANKS	\$1,475	\$1,617	2,825	413	14.6%	91.1%	13.4%	85.8%	90.9%	89.2%	75.3%
NORTH POLE	\$1,650	\$1,846	692	62	9.0%	74.0%	10.1%	68.1%	83.4%	59.8%	66.0%
JUNEAU CITY & BOROUGH*	\$1,500	\$1,554	968	39	4.0%	54.8%	23.6%	54.2%	98.8%	98.0%	93.1%
DOUGLAS	\$1,400	\$1,600	151	5	3.3%	37.7%	15.2%	23.8%	98.7%	98.7%	96.7%
JUNEAU	\$1,515	\$1,554	793	34	4.3%	56.6%	25.3%	58.6%	98.7%	97.9%	92.2%
KENAI PENINSULA BOROUGH*	\$1,059	\$1,200	1,152	62	5.4%	66.0%	23.4%	64.2%	84.9%	84.9%	76.6%
HOMER	\$1,040	\$1,327	265	13	4.9%	43.0%	15.5%	37.4%	67.9%	67.5%	65.3%
KENAI	\$1,000	\$1,100	419	20	4.8%	86.6%	23.9%	86.9%	95.9%	95.7%	90.0%
SOLDOTNA	\$1,150	\$1,270	307	15	4.9%	62.2%	16.3%	61.6%	88.9%	90.9%	80.8%
KETCHIKAN BOROUGH*	\$1,203	\$1,402	412	29	7.0%	65.8%	36.7%	58.5%	55.6%	55.8%	52.7%
KODIAK BOROUGH*	\$1,325	\$1,408	399	20	5.0%	80.2%	28.1%	73.7%	98.0%	97.0%	97.2%
MAT-SU BOROUGH*	\$1,300	\$1,445	1,025	44	4.3%	47.5%	12.3%	47.8%	90.3%	83.2%	77.9%
PALMER	\$1,350	\$1,521	155	7	4.5%	45.8%	11.6%	41.9%	76.8%	72.3%	59.4%
WASILLA	\$1,350	\$1,445	828	32	3.9%	47.3%	12.3%	48.6%	93.1%	85.9%	82.1%
PETERSBURG & WRANGELL BOROUGH*	\$950	\$1,178	178	6	3.4%	48.3%	12.4%	37.6%	55.6%	57.3%	60.1%
SITKA*	\$1,150	\$1,474	342	21	6.1%	34.5%	13.2%	33.6%	14.0%	23.4%	13.7%
SURVEY TOTAL	\$1,400	\$1,554	17,098	1,226	7.17%	72.9%	18.8%	71.9%	64.8%	63.3%	83.0%

*These lines show the total survey results for each Borough or Census Area.

Italics - These are sub-areas of each Borough or Census Area, and contain 100 or more survey responses. Sub-area responses are included in the respective Borough or Census Area Total.

REVISED (abbreviated) Recommended Short-Term and Longer-Term Steps for Short-Term Rentals (DRAFT EDC, as of

8/6, AI Assisted from Commissioner input)

First Steps (2027–2028)

1. **Clarify lodging definitions in Title 21.** Define short-term rentals by length of stay and type of accommodation, and distinguish them from bed-and-breakfasts, rooming houses, hotels, and other commercial lodging.
2. **Establish a simple annual registration program.** Begin with a free or nominal-fee registration focused on tax compliance, operator communication, emergency contacts, and baseline data.
3. **Prepare for administration and compliance.** During the initial operating season, test registration and monitoring software, and conduct outreach.
4. **Maintain current zoning allowances during the initial data period.** Allow properly registered STRs where residential uses are permitted.
5. **Define measures of success and report annually.** Establish consistent measures—including the number and location of STRs, registration and administrative costs, and provide an annual public report.

Longer-Term Steps (Two to Five Years)

1. **Evaluate the registration program and local impacts.** Use multiple operating seasons of data to assess trends by zoning district, owner occupancy, operator residence, unit type, seasonality, compliance, and City costs and revenues.
2. **Consider a tiered regulatory framework if supported by the data.** Evaluate whether different requirements are warranted for owner-occupied rentals, full-dwelling rentals, nonresident-operated properties, or larger multi-unit operations.
3. **Adopt a cost-based fee and enforcement structure.** If necessary, establish fees proportionate to administrative and enforcement costs. Avoid using ownership or residency categories unless the City has established a clear policy purpose and completed legal review.
4. **Review targeted safety standards.** Consider a basic self-certification checklist for safety features.
5. **Advance long-term and workforce housing incentives.** Explore streamlined permitting, accessory-dwelling-unit support, grants, utility or tax incentives where legally available.

6. **Evaluate revenue options and permitted uses.** Examine whether a tiered license fee, borough-level bed tax, or other lawful revenue mechanism is feasible. Coordinate with the Kenai Peninsula Borough and obtain legal and financial review before pursuing tax changes.

Suggested Sequence

Year 1: Adopt definitions and registration requirements; complete outreach; procure or test administrative tools.

Years 1–2: Register operators, monitor implementation, enforce existing requirements, and publish annual results.

Years 2–3: refine fees, compliance procedures, and safety measures as needed.

Years 3–5: consider targeted zoning or licensing changes and housing or revenue programs only after reviewing local evidence, administrative capacity, fiscal impacts, and legal authority.

**CITY OF HOMER
HOMER, ALASKA**

Davis/Erickson

RESOLUTION 26-028(A)

A RESOLUTION OF THE CITY COUNCIL OF HOMER, ALASKA
ASKING THE ECONOMIC DEVELOPMENT ADVISORY COMMISSION
(EDC) TO REVIEW SHORT-TERM RENTALS (STRs), GATHER
COMMUNITY INPUT, AND PROVIDE FINDINGS AND
RECOMMENDATIONS TO THE CITY COUNCIL

WHEREAS, Short-term rentals (STRs) are one of several factors that may influence housing availability, seasonal workforce needs, and the local economy in Homer; and

WHEREAS, Homer experiences significant seasonal variation in population, housing demand, and visitor activity, particularly during peak summer months; and

WHEREAS, The availability of both long-term and seasonal summer and winter housing is an ongoing concern for residents, employers, and employees in the community; and

WHEREAS, STRs may provide economic benefits to property owners, local businesses, and the broader visitor economy; and

WHEREAS, Policy approaches to STRs vary widely across Alaska and other tourism-based communities, including registration approaches, zoning tools, owner-occupancy requirements, and other local measures; and

WHEREAS, The City Council recognizes the importance of maintaining a level playing field among lodging types, and between STR activity occurring within and outside City limits, including consideration of tax collection and related requirements; and

WHEREAS, The City Council would benefit from a clearer understanding of local conditions in Homer, including community perspectives and how STRs may interact with housing availability and economic activity; and

WHEREAS, The City Council desires to consider both potential benefits and potential unintended consequences of any future policy direction;

NOW, THEREFORE, BE IT RESOLVED that the City Council of Homer, Alaska hereby directs the Economic Development and Advisory Commission to:

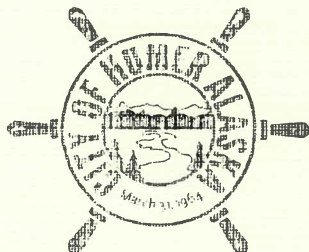
1. Gather input from a range of local perspectives, including residents, renters, employers, STR hosts, Kachemak Board of Realtors, the Kenai Peninsula Economic Development District and others affected by seasonal housing dynamics;

2. Consider definitions of STR's, hotels, hostels, bed and breakfasts, hotels and apartments in conjunction with the Title 21 rewrite project;
3. Develop a general understanding of STR activity in Homer, including approximate numbers, general distribution, and seasonal patterns of use;
4. Consider how housing availability changes throughout the year, particularly during peak summer months, slower winter months and how STRs may or may not contribute to those changes;
5. Review examples of STR approaches used in other Alaska and comparable communities, and consider which elements, if any, may be relevant to Homer (the attached AI-assisted summary of other communities' approaches may be helpful in this regard);
6. Consider potential effects of STR activity and potential policy responses on housing availability, seasonal workforce needs, local businesses, and the visitor economy;
7. Consider the potential benefits, costs, and practical implications of a local STR registration approach, including whether registration numbers should be displayed in online listings or advertising, whether registration should be offered at no cost, a nominal cost, or at a level intended to recover administrative expenses, and whether a registration approach would improve the City's understanding of STR activity and support more informed decision-making;
8. Provide to the City Council a summary of observations, key takeaways, and a small number of possible near-term steps for Council consideration;
9. Provide, if appropriate, a broader range of potential future approaches for Council discussion;
10. Report back to the City Council ~~on or before~~ **between August 1st and** October 15, 2026.

PASSED AND ADOPTED by the Homer City Council this 13th day of April, 2026.

CITY OF HOMER

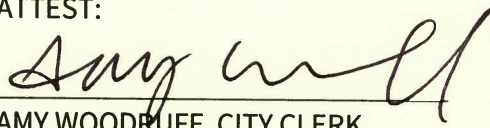
RACHEL LORD, MAYOR



86 ATTEST:

87

88

89 
AMY WOODRUFF, CITY CLERK

90

91 Fiscal Note: N/A

- Submitted to the City of Homer Economic Development Commission

By Landa Baily, Commissioner

August 18, 2026

Dear EDC Commissioners:

The issue of short term rentals is in large part before the EDC because Homer residents brought the issue of businesses and individuals, who do not live on the property, operating these commercial uses in residential zones, to the Homer City Council.

The EDC mission states in part: “. . . promote a high quality of life for Homer **residents** and businesses. (Bolding provided.)

The public concern is clear: 460 signatures on a petition advocating that STR’s in residential zones in the City of Homer be allowed only on the property that is the primary residence of the owner/operator, submitted as public comments to the City of Homer Joint City Council and Planning Commission work session, June 22, 2026. Other public comments: Approximately 23 public comments asked for allowing STRs only on property that is the primary residence of the owner/operator in residential zones and approximately 22 public comments asked for no STR regulations.

I ask that the agenda for our upcoming meeting include an item addressing STR property ownership. I intend to make up to three motions for consideration by my fellow EDC members:

- 1) I move that the Economic Development Commission advise the City Council to amend Title 21 to allow Short Term Rentals in all Residential Zones only on the premises of the operator’s primary permanent residence.
- 2) I move that the Economic Development Commission advise the City Council to amend Title 21 to allow Short Term Rentals in all non-Residential Zones regardless of property ownership.
- 3) I move that the Economic Development Commission advise the City Council to amend Title 21 to allow operators of STRs that are in Residential Zones on property other than the operator’s primary residence that have been in operation for the preceding year in accordance with all applicable local and state laws to continue to operate under a nontransferable “grandfather” exemption that terminates upon the transfer of ownership or lease of the property or the STR business.

Answers to concerns I have heard raised in testimony before us to date:

How is an operator’s primary residence determined? It is the primary or permanent place of residence per the operator’s Alaska Permanent Fund eligibility application or that would qualify as the operator’s permanent primary residence for purposes of PFD eligibility.

How is compliance with applicable state and local laws determined? Presentation of an applicable State of Alaska Business license and Kenai Peninsula Borough sales and business tax records.

Does this allow for the STR to be located in, not only the dwelling unit, but also in an accessory building on the property of owner/operator's primary residence? Yes.

Does this allow for the STR operator to temporarily reside at another location while operating the STR? Yes, as long as the property is the operator's primary residence per the State of Alaska Permanent Fund eligibility requirements.

Is the operator allowed to conduct another business, e.g. commercial fishing, away from Homer while operating an STR on the property of their primary residence? Yes.

If the operator's primary residence is in an apartment of an apartment building that the operator owns, is the operator allowed to operate a STR in another apartment in the same building? Yes.

If the property is in the business district, on the Spit, or in another nonresidential zone, does the operator have to reside on the property? No.

Will enforcement of this zoning provision differ from enforcement of the other Title 21 provisions? No. It will be enforced as all other Homer zoning regulations are enforced.