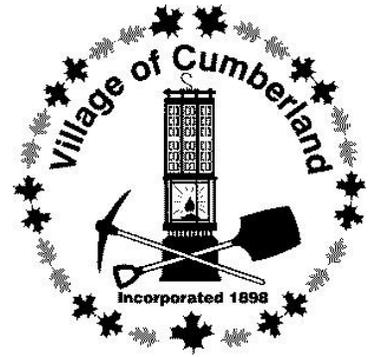


COUNCIL REPORT



REPORT DATE: 6/15/2021
MEETING DATE: 6/28/2021

File No. 6700

TO: Mayor and Councillors
FROM: Karin Albert, Senior Planner
SUBJECT: Public Engagement – Review of Vacation Rental Regulations

RECOMMENDATION

- i. THAT Council receive the June 15, 2021 report “Public Engagement – Review of Vacation Rental Regulations”.
- ii. THAT Council endorse the Vacation Rental Regulations Review Resident and Stakeholder Engagement Plan.
- iii. THAT Council approve the expenditure of up to \$10,000, to be funded by the general financial stabilization reserve, for the Vacation Rental Regulations Review project and amend the adopted 2021-2025 Financial Plan bylaw to reflect this expenditure.

PURPOSE

This report provides a project outline to review the Village’s vacation rental regulations including an engagement strategy to gather input from residents and stakeholders. The report also provides a brief review of findings of the 2020 Housing Needs Report in regards to trends in vacation rental operations in Cumberland.

PREVIOUS COUNCIL DIRECTION

Date	Resolution
June 22, 2020	<p>THAT Council accept the “Village of Cumberland Housing Needs Report Data Results, May 2020.</p> <p>THAT the “Cumberland Housing Needs Report Data Results May 2020” be referred to the Advisory Planning Commission and the Homelessness and Affordable Housing Committee for information.</p>
June 10, 2019	<p>THAT vacation rental regulations be reviewed upon completion of the 2019/2020 Housing Needs Assessment and in conjunction with the review of the Official Community Plan in 2020.</p> <p>THAT the June 5, 2019 staff report on vacation rental regulations be referred to the Homelessness and Affordable Housing Committee, the Economic</p>

	Development Steering Committee and the Advisory Planning Commission for comment.
December 10, 2018	That staff review the Zoning Bylaw in regard to vacation rentals and report back to Council as soon as possible.
November 14, 2016	THAT Council adopt the Affordable Housing Implementation Framework. Action 9: Develop regulation to protect existing rental market housing stock by bringing protections to purpose-built rental and mobile homes, as well as limiting short-term vacation rentals in existing rental stock, can ensure that existing rental housing is protected

BACKGROUND

Housing Needs Report Findings

At the time of the 2016 census, Cumberland had 1,555 households. Of those, 26.5% were rental households. One in four rental households were in *core housing need*¹ with the greatest need among single person households. One out of 14 rental households were in *extreme housing need*². Extreme housing need affected single, 3- and 4-person households equally.

In Cumberland, single person households are likely to rely primarily on the availability of secondary suites and accessory dwelling units since the Village has few rental apartment buildings and single family dwellings tend to be too expensive to rent for a single person. Three and 4-person households require larger units and, therefore, likely prefer single family dwellings or accessory dwelling units over secondary suites, provided they can afford the rent.

Over the past decade, vacation rentals, both as an income source and investment strategy, have grown significantly, raising concern of the impact of vacation rentals on the availability of long-term rental housing. Vacation rentals remove a certain number of long term rentals from the market, reducing rental housing supply and decreasing rental vacancy rates. This not only makes it more difficult for households to find a place to rent but also puts an upward pressure on rental rates as renters compete for fewer rental places.

In 2021, Cumberland issued nine business licences for vacation rentals. That number has remained relatively stable over the past few years. However, we know that many vacation rental operations do not obtain business licences because they may be operating in a zone where vacation rentals are not permitted or they may be renting out RVs or units that do not meet BC Building Code.

The 2020 Housing Needs Report sought to identify the actual number of units that are used as vacation rentals. The report analyzes data from AirDNA, a company that scans vacation rental websites including AirBnB for listings.

The Housing Needs report distinguishes between the *total market* (all active vacation rentals offering accommodation within a given time period) and the *commercial market*. The commercial market are vacation rentals available and/or booked more than 50 percent of the days that they

¹ Core housing need is defined as dwellings considered inadequate, unsuitable, or unaffordable. 'Unaffordable' refers to a dwelling where rent costs more than 30% of household income.

² Extreme housing need is when a household pays more than 50% of income on rent.

were active. For example, if a property was active in 2017 and provided booking availability for 200 days (about 55% of the year), it would be considered ‘commercial’ since the primary use of the unit is vacation rental accommodation. The ‘more than 50 percent’ filter separates vacation rentals used principally for income and investment purposes from the *occasional market*, dwellings that are only rented out occasionally by their owners to generate supplemental income while they’re on vacation themselves or living at a second residence.

The Housing Needs Report further distinguishes between *entire units*, that is an entire house, accessory dwelling unit, suite or apartment and *other* which includes a room in a dwelling, a hotel room or other type. The Housing Needs Report considers *entire unit* listings to represent units that would have the potential to be rented out to long term tenants.

Cumberland’s *total vacation rental market* grew from one unit between January 1, 2016 to 73 units in October 2019. The *commercial market* grew from 0 to 47 units in the same time period. The *occasional market* grew from 0 to 26 units. See table 1 below.

Of concern is the growth of *entire units* rented commercially since those are units that could potentially be used as long-term rentals. At the end of 2019, 38 *entire units* were rented commercially. This represented an estimated 9 percent of rentals in Cumberland (or 38 out of an estimated 422 rental units in 2019).

However, as the Housing Needs Report points out, it is difficult to know how many of those 38 units would convert to long-term rental units or owner-occupied units if they could not be rented as short-term vacation rentals.

Table 1: Vacation Rentals – Total, commercial and occasional

	2016				2017				2018				2019			
	Jan	Apr	Jul	Oct												
Total Market	1	4	5	22	27	30	41	44	43	50	58	60	59	63	69	73
Entire Unit	0	2	2	12	15	17	27	33	33	41	49	51	46	51	55	57
Other	1	2	3	10	12	13	14	11	10	9	9	9	13	12	14	16
Commercial Market	1	4	5	16	20	21	28	32	26	37	45	46	37	39	43	47
Entire Unit	0	2	2	6	11	12	18	24	21	31	38	39	30	33	34	38
Other	1	2	3	10	9	9	10	8	5	6	7	7	7	6	9	9
Occasional Market	0	0	0	6	7	9	13	12	17	13	13	14	22	24	26	26
Entire Unit	0	0	0	6	4	5	9	9	12	10	11	12	16	18	21	19
Other	0	0	0	0	3	4	4	3	5	3	2	2	6	6	5	7

Another key finding of the Housing Needs Report is that most of the growth in total vacation rentals (solid blue line) is due to the increase in commercially rented units (solid green line) as per figure 1 below.

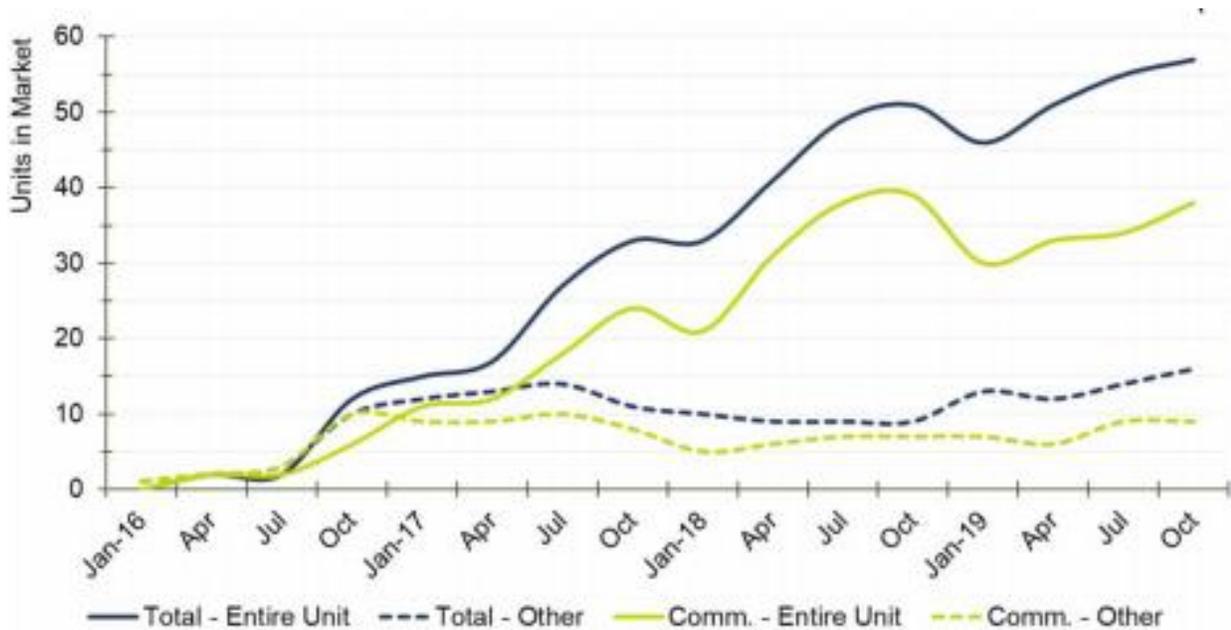


Figure 1: Trend in total and commercial vacation rental units in Cumberland

The increase in commercial *entire units* in Cumberland is mirrored in the rest of the Comox Valley. In October 2016, there were 116 commercial *entire units* in the Valley, accounting for 91 percent of the *entire unit* market. The commercial *entire units* peaked at 341 in July 2019.

As of October 2019 (the last date of data in the report), commercial *entire units* made up about 85 percent of the *entire unit* market. In the whole CVRD, commercial *entire units* represented about 4 percent of the rental housing market, as opposed to 9 percent in the Village of Cumberland.

It is important to remember that since Cumberland does not have hotels or motels, much of its tourist accommodation relies on the availability of vacation rentals. Vacation rentals play an important role in retaining tourists in the Village for over-night stays and to encourage visits to local restaurants and pubs. Vacation rentals also provide an experience that is unique and very different from a hotel. The intent of the review of vacation rental regulations is not to eliminate that important sector of the Village’s local economy. The purpose of the review of vacation rental regulations is to understand their impact, both positive and negative, on the community and understand the level of support for regulatory changes that may enhance the positive impacts of vacation rentals and reduce the negative ones. Based on those findings, staff will present recommended regulatory changes to Council. Following is an overview of the entire project.

Project Overview

Background Research

At the June 10, 2019 Council meeting, staff presented a comprehensive report on the Village’s vacation rental regulations including:

- types of concerns expressed by neighbours to vacation rental operations;
- importance of vacation rental regulations to tourist accommodation in Cumberland;
- vacation rental listings in Cumberland at that point in time;
- tools to regulate vacation rentals and how they are used in other jurisdictions; and

- a review of rental housing need in Cumberland based on available data at the time (see [item 6.3 of the June 10, 2019 Council meeting](#) for the full report).

On June 22, 2020, Council received the final [Housing Needs Report \(view attachment 3 of agenda item 6.1 of that meeting\)](#). The report included results of monitoring vacation rental listings between January 2016 and October 2019.

Committee Review and Discussion

The June 10, 2019 staff report on vacation rental regulations and the May 2020 Housing Needs Report were shared with the Advisory Planning Commission, Homelessness and Affordable Housing, and Economic Development Steering Committees for discussion and comments. The Committees discussed a range of possible regulatory approaches and supported public engagement on the different approaches. See attachment 1 for Committee meeting minutes and recommendations on this topic.

Resident and Stakeholder Engagement Plan

Following is an overview of the proposed next steps and timelines to review the Village's vacation rental regulations with residents and stakeholders.

1. *On-line and Paper Survey*

Purpose:

- a. Gain better understanding of:
 - Economic importance of vacation rentals to owners and to Cumberland;
 - Profile of vacation rental owners; and
 - Resident attitudes in regards to vacation rentals in Cumberland.
- b. Check-in on perspectives and level of support for possible regulatory tools such as:
 - Zones in which vacation rentals are permitted;
 - Fee structure and permit requirements for year-round vs seasonal vacation rentals;
 - Cap on total number of commercial year-round vacation rentals;
 - Principal residency requirement by owner or long term tenant;
 - Restrictions based on dwelling type;
 - Restrictions on number of units per property;
 - Requirement to identify rental business at 'gate' and post a contact person.

2. *Workshops*

Host one or two on-line or in-person workshops (depending on COVID19 restrictions) to provide background information, answer questions, and review regulatory options with stakeholders and residents.

3. *Public Communications – Throughout Project*

- a. Create page with background information on Village website and link to survey.
- b. Promote engagement events through Village email newsletter.
- c. Create public notices, posters, social media ad, and notices.
- d. Invitations to participate and follow-up with current business licence holders and Business Association.

4. Analysis of public comments Staff reviews and prepares a public engagement summary and analysis.

5. Report to Council

Staff report on public engagement findings and analysis, feasibility of certain regulatory tools and operational implications, and recommended regulatory alternatives for discussion, Council direction and referral to Village Committees.

6. Committee Referrals

7. Report to Council and Initiation of Bylaw Review Process

Staff report on Committee discussion and recommendations, required amendment bylaws (possibly to both the Zoning and Business Licence bylaws) and initiation of bylaw review and adoption process.

Engagement will start late summer/early fall to allow for the bylaw review process to commence in early 2022.

ALTERNATIVES

1. THAT Council direct staff to engage the public and stakeholders on possible changes to vacation rental regulations as part of the next Official Community Plan review (*as per the June 2019 Council resolution*)
2. THAT Council direct staff to develop one or two alternatives to amend the Village’s vacation rental regulations for discussion at an upcoming Committee of the Whole or Council meeting prior to initiating resident and stakeholder engagement on the topic.
3. THAT Council direct staff to put review of vacation rental regulations on hold until the end of the current pandemic.

STRATEGIC OBJECTIVE

- Healthy Community
- Quality Infrastructure Planning and Development
- Comprehensive Community Planning
- Economic Development

FINANCIAL IMPLICATIONS

The total cost estimate for the project is \$10,000. This includes newspaper and social media ads, renewal of the Village’s subscription to an on-line survey tool, consulting services for graphic design and layout of background materials and legal advice.

Staff is recommending that the general financial stabilization reserve be used to fund this project. The balance available in this fund is \$630k.

OPERATIONAL IMPLICATIONS

Policy planning and regulatory reviews are part of the services provided by Development Services. The public engagement process, research, report writing, and preparation of amendment bylaws

will take up to 20% of the Senior Planner's time, spread out over several months. The project will also require the support of other Planning staff, Corporate Services and Economic Development staff.

ATTACHMENTS

Attachment 1: Committee comments and recommendations

CONCURRENCE

Courtney Simpson, Manager of Development Services **CS**

Kaelin Chambers, Economic Development Officer **KC**

Michelle Mason, Chief Financial Officer **MM**

Respectfully submitted,

Karin Albert
Senior Planner

Clayton Postings
Chief Administrative Officer

Attachment 1: Committee Comments and Recommendations

Advisory Planning Commission

August 8, 2019 meeting (discussions on vacation rental report):

4. REFERRALS FROM COUNCIL

a) Vacation Rental Regulations

Bonaguro / Kishi: THAT the Advisory Planning Commission receive the report "Vacation Rental Regulations" dated August 1, 2019 for comment.

CARRIED

DISCUSSION

Staff provided an overview of the report and the history of the topic in the community and the research conducted to date by staff, key points included:

- i) Concern over removing long-term rental stock from the marketplace for vacation rentals.
- ii) Potential nuisance factor of loud guests raised as a concern. There is already a defined process for the municipality to receive complaints about nuisance properties so no additional/new processes would need to be created; however there is limited bylaw enforcement capacity so unless a complaint is received vacation rentals are not regularly monitored by bylaw officers.
- iii) Current local hoteling capacity is low / limited (campground, hostel, few hotel rooms).
- iv) Vacation rental snapshot provided in staff report was done at a point in time and therefore may be quite different than what is actually being offered in summer peak months. There are about 200 secondary suites and accessory dwelling units which are all potential rental units aside from apartment buildings and single-family dwelling units that are rented out by their owners.
- v) Currently there have been 9 business licenses (at \$110 each) granted to vacation rental units under the business license bylaw, this is much less than the number of suites being advertised as described in the staff report. Owners may not be aware of the licensing requirement.
- vi) Per the 2016 census, of the 1,565 households approximately 13% of the total number of dwellings have the potential for operating a secondary suite (i.e. as a long-term rental or vacation rental). Further of the 1,565 households 26.5% of households rent (i.e. either the primary residence or the secondary suite).
- vii) The two key tools available to help manage vacation rentals are the business license bylaw (which licenses vacation rental businesses) and the zoning bylaw (which allows vacation rentals in certain zones only).
- viii) There is currently no hotel tax in Cumberland.

vix) The APC provides the following comments to Council:

1) Community and Economic Development

- a. Vacation rentals have a purpose in the Village.
- b. Cumberland has a culture of hosting others and welcoming others into our homes. Vacation rentals are one method of expanding this practice and we would like to see this continue.
- c. The kinds of things Cumberland has to offer are “touristy type things” which support a vacation rental marketplace.
- d. Many vacation renters are not eating in the suites, they are spending time and money in the community.
- e. Would like to see vacation rentals tied to an economic development strategy – leverage the property owners to get involved in creating this market.

2) Affordable Housing

- a. Vacation rentals may be a key factor in enabling home purchase to be affordable (whether or not the suite income qualifies for mortgage affordability calculations).
- b. Vacation rentals help to make housing more affordable for current, and prospective new, residents that may have difficulty affording home ownership without the various rental income options.
- c. Vacation rentals may provide flexibility to owners that are drawn away from the community from time to time or on a regular basis and wish to retain the residence for an anticipated future return date but avoid the restrictions that come with long-term rentals and the Residential Tenancy Agreement.

3) Needs Assessment

- a. Suggest that more work be done on the Housing Needs Assessment to better define the objectives that vacation rentals will play a role in achieving (e.g. what increase in overnight stays is Cumberland seeking, and in what kinds of accommodations, in what locations in the village). From there it will be easier to understand which policy tools (incentives and consequences) are most effective at reaching those objectives.
- b. For several reasons it may be quite difficult to quantify any negative impact of vacation rentals to the long-term rental housing market, understanding the obstacles to finding long-term rental housing will help to inform this picture and determine if the vacation rental market does actually cannibalize the long-term rental market or if the markets are in fact quite separate.
- c. The risk of all the possible 200 rental units in the Village turning into vacation rentals is unlikely as the regular turnover in vacation rentals

requires significant effort to clean and maintain that would otherwise be a long-term tenant's responsibility. Not all owners would decide to take on the opportunity of establishing and managing a vacation rental business, and not all owners want full time secondary residents so may not choose to offer their suites for long term rental anyway.

4) Regulation & Enforcement

- a. Continue with mandatory business license requirement and advertising license number on publicly available marketing material (e.g. website listings, brochure).
- b. A communication campaign may be valuable to communicate licensing requirements, given the numbering operating without a license.
- c. If the objective of licensing is primarily to understand the volume of vacation rentals then keeping the licensing fees lower would create more voluntary compliance than having much higher licensing fees. While higher fees may create a larger revenue stream for the Village, it may incent non-compliance with licensing requirements.
- d. Consider some serious enforcement tools if non-compliance or nuisance properties becomes a recurring problem, to make the bylaw enforcement activities cost recoverable.
- e. The nuisance cases will likely be a very small percentage of the entire group and focusing on this small group of people rather than enabling the other much larger majority to contribute to economic development within the Village could debilitate this sector of Cumberland's local economy.
- f. The AirBnB concept, specifically, is founded on the principles of a "shared economy", where the relationship between the owner and guest and the two-way rating system forms both a contractual and personal relationship between host and guest which helps to manage the nuisance factor well, perhaps better than other vacation rental platforms (e.g. VRBO, Expedia).
- g. A cap on the total number of vacation rental business licenses at this time seems premature given the low occupancy of available suites currently. Perhaps something to consider in the future. However, there may be value in restricting the number of vacation rentals (units) per property to further reinforce the desire to not have multiple groups of guests in the same area which may create the potential for greater nuisance (noise, parking challenges etc.).

5) Owner/Resident Occupancy

- a. The APC is in favour of exploring an occupied model (i.e. owner-occupied, long-term tenant occupied, or designated local caretaker/agent/host managed). This level of oversight may create

further incentive for guests to take care of the property and not be a nuisance.

- b. One key intention of this approach is to reduce the number of absentee owners and rather support the people who live in the community full time. This model could be combined with the licensing approach where the license would require the registration of owner/resident/host information.

6) Location of Vacation Rental Zoning

- a. Restricting vacation rentals to the downtown core assumes that all guests are interested in accommodation in that area, this limits the guests' choice of location within the community of where they would like to stay. Consider expanding the zoning to enable vacation rentals in additional areas of the community. Vacation rentals are not hotels and therefore may not have the same desire to be on the main corridors/thoroughfares (which is what hotels actually want – visibility). Limits the affordability question for the newer homes outside of the downtown core.

7) Infrastructure

- a. The civic infrastructure is likely in place to service the current number of legal suites or vacation rental properties.
- b. New construction (e.g. Coal Valley Estates area) was designed with suites in mind and therefore the infrastructure installed was designed to support this anticipated occupancy. The current zoning for vacation rentals limiting them to the commercial core does not take advantage of the new infrastructure and purpose-built legal suites in newer areas of the Village (e.g. Coal Valley Estates).
- c. Any new accessory dwelling units being built throughout the Village will need to meet the current infrastructure requirements.

July 9, 2020 meeting (discussion on Housing Needs Report):

(a) Cumberland and Regional Housing Needs Reports

Kishi / Bonaguro: THAT the Advisory Planning Commission receive the Cumberland Final Housing Needs Report which includes the following attachments:

- Comox Valley Community Profiles, May 2020
- Village of Cumberland Housing Needs Report Data Results, dated May 2020
- CVRD Final Housing Needs Report, dated June 30, 2020
- CVRD Housing Needs Assessment Engagement Report

CARRIED

DISCUSSION

- Staff provided background on the Housing Needs Assessment
- The report is final, therefore APC not being asked for feedback, the report is provided for information and to support decision-making on applications that affect long term rental housing
- Tofino limited vacation rentals to improve long term rental stock
- Village also needs vacation rental accommodation to enable visitors to the Village
- Consider cooperative housing, relationships between developers and the municipality
- Vacation rentals enable affordability for home ownership
- Innovative, progressive ways to address the challenge
- Look at innovative ways to tackle the housing problem beyond traditional means (bylaws, fees)
- Indicators that the private sector cannot meet the housing demands on below market housing
- Some data in the report on the level of subsidies may not accurately reflect the current (likely higher) number of subsidies provided in the municipality. This is likely due to complete data not being available from sources (e.g. BC Housing)
- Can create more housing stock but that new stock may not be affordable
- Tofino and Ucluelet have their own housing corporations under their municipalities
- *Local Government Act* enables municipalities to negotiate housing agreements with developers (e.g. can negotiate rents amounts for a period of time)
- Coalition to End Homelessness exists and is doing work in this area
- There may be an upcoming review by the Regional District review on homelessness services
- Consider more active role of municipality to address the challenges
- Consider the impact of migration from the Lower Mainland of BC
- Consider the impact of Courtenay and Comox's more restrictive bylaws related to secondary suites. Increasing the ability to create small suites in homes in those areas may increase supply within the region, an impact which Cumberland cannot create on its own. Right now a rezoning application is required to install a suite
- Needs and wants of our village may be very different than other municipalities in the region related to the average age of our population (e.g. recreation), additional impacts re the need for new schools from young families
- Staff provided an overview of some of the potential tools available to municipalities to address the findings in the reports:
 - Consider density bonuses and review how this is working (consider amendments)

- Consider rental-only zones
- (Re) negotiating development agreements to include affordable housing (e.g. Coal Valley Estates, Trilogy) – affordability wasn't as much of an issue when these agreements were put in place
- Being open to partnering on below market rental housing – the Village is prioritizing these applications
- OCP amendment process
- Consider establishing a regional housing corporation

Homelessness and Affordable Housing Committee

June 17, 2019 meeting:

Planning staff provided a brief overview of the vacation rental staff report that was presented to Council at their June 10, 2019 meeting. The two bylaws that currently regulate vacation rentals in Cumberland are the Business Licence Bylaw No. 896 and the Zoning Bylaw No. 1027. The Committee discussed the various tools presented in the staff report to deal with the impacts of vacation rentals on neighbours and long term rental housing and passed the following resolutions.

THAT staff look into whether as part of business licensing, the Village can require proof of liability insurance for the use.

THAT the Village require owners to have principal residency of their vacation rental property and THAT the property be owner occupied while the vacation rental unit is rented out.

THAT staff investigate whether the business licence fee for vacation rentals could be increased and all or a portion of the fee could be contributed to a housing fund.

THAT staff investigate whether a hotel tax could be imposed on vacation rentals with the revenue being contributed to a housing fund.

THAT the business licence bylaw be amended to require the inclusion of a business licence number in all advertising and promotions of vacation rentals.

Economic Development Steering Committee

July 10, 2019 meeting:

4.1 Vacation Rental Regulations Report

The EDSC was joined by the Villages Sr. Planner, Karin Albert, who presented the results of the Vacation Rental Regulations Report which was referred by Council for committee comment on June 10, 2019.

As requested by Council, the EDSC discussed findings of the report and provided comment on the regulation of vacation rentals within the Village's business license bylaw, including:

- Impacts to long-term housing inventory – The committee supported the Village’s plan to incorporate the findings of the Village’s Housing Needs Assessment in order to better understand and regulate potential impacts of vacation rentals on the community’s long-term housing inventory and associated rental costs.

Based on the findings of the Housing Needs Assessment, it was recommended that the Village consider establishing a cap on the number of vacation rental licenses to ensure minimal impact to the community’s long-term housing inventory.

- Advertising requirements – The committee was supportive of Council’s direction to notify licenced vacation rental owners and request them to advertise their business licence number within their advertising.

A recommendation was also made to require property owners and/or licence holders to provide contact information via onsite signage at the location of vacation rental units. This would allow the community to address questions and/or concerns to the responsible parties, particularly in cases where vacation rentals are not the principle address of the building’s owner.

- Vacation Rental Licensing Fees – It was recommended that the Village explore opportunities to utilize Village revenues generated from vacation rentals towards other community needs, including:
 - The implementation of a hotel tax on vacation rentals with revenues directed towards a community housing fund.
 - Establishing caps on the number of vacation rental licenses and establish fees that are representative of the costs of license administration (including bylaw enforcement). Additional fees could also be directed towards a community housing fund.
 - Scaling license fees dependent on the type of housing being used as a vacation rental. In order to minimize the impact of short term rentals on the Village’s inventory of family sized homes (3+ bedrooms), it was recommended that the Village:
 - Limit the number of rooms allowed within a vacation rental (ie no more than 3), or
 - Increase licensing fees for vacation rentals of 2 bedrooms or more.
- Vacation Rental Regulation - The Committee discussed the disproportionate number of unlicensed vacation rentals in the Village and how best to encourage compliance with the requirements of the business license bylaw.

It was acknowledged that the number of out of compliance vacation rentals showed the increasing demand for vacation rentals in the community and that any regulation should be focused on finding a balance between meeting market demand and not negatively impacting local housing inventory.

Rather than applying enforcement in order to achieve compliance, it was recommended that the Village seek ways to offer/provide benefit to vacation rental operators, such as:

- Access to the Village's economic development services; and
- Promotion and/or recognition of compliant vacation rentals via the Village's economic development website