

**AGENDA REPORT  
PLANNING AND ZONING COMMISSION MEETING  
April 9, 2026**

**SUMMARY**

A request by Lori Cook (agent), on behalf of the Cook Family Revocable Living Trust (owner), to allow 2208 Concordia Drive to be used as a 210-night, maximum eight-guest short-term rental pursuant to Sec. 29-3.3(vv) and Sec. 29-6.4(m)(2) of the Unified Development Code. The 0.32-acre subject site is located southeast of the intersection of Concordia Drive and Loch Lane.

**DISCUSSION - APPLICATION EVALUATION**

The applicant seeks to obtain a Conditional Use Permit (CUP) to allow 2208 Concordia Drive to be used as a short-term rental (STR) pursuant to Sec. 29-3.3(vv) and Sec. 29-6.4(m)(2) of the Unified Development Code. As of June 1, 2025, any dwelling operated as an STR must fully comply with the provisions of the STR regulations, which include the acquisition of an STR Certificate of Compliance, Business License, and submission of accommodation taxes. Approval of this request is a required prerequisite to proceeding forward in obtaining the STR Certificate of Compliance and business license.

The owner of the subject property has not previously operated the subject site as a short-term rental. Operation of the dwelling as an STR following final City Council action without acquiring the STR Certificate of Compliance and business license would constitute an illegal use of land and would be subject to revocation, if authorized, as well as other enforcement actions identified in the City Code.

The following is a site-specific analysis of the property:

**Dwelling Unit Details**

|                                 |                                                                                                                                       |
|---------------------------------|---------------------------------------------------------------------------------------------------------------------------------------|
| <b>Property Address</b>         | 2208 Concordia Drive                                                                                                                  |
| <b>Zoning</b>                   | R-1 (One-Family Dwelling)                                                                                                             |
| <b>STR Request Type</b>         | Tier 2, 210 nights                                                                                                                    |
| <b>Maximum Guests Requested</b> | 8                                                                                                                                     |
| <b>Bedrooms</b>                 | 4                                                                                                                                     |
| <b>Parking Spaces</b>           | 3 parking spaces are provided on-site and 4 spaces are required. 1 additional space will need to be provided to accommodate 8 guests. |
| <b>Abutting Properties</b>      | R-1 in all directions                                                                                                                 |

**Owner/Agent**

|                                     |                                    |
|-------------------------------------|------------------------------------|
| <b>Owner</b>                        | Cook Family Revocable Living Trust |
| <b>Designated Agent</b>             | Kent Cook                          |
| <b>Agent's Distance to Property</b> | 8.9 miles, 16 minutes              |

## Listing Information

|                         |                               |
|-------------------------|-------------------------------|
| Listing Links           | N/A                           |
| STR previously offered? | No                            |
| STRs within 300 feet?   | There are no STRs within 300' |
| Primary residence?      | No                            |
| Previous Violations?    | None                          |

## Conditional Use Analysis

Operation of an STR within the subject dwelling requires approval of a Conditional Use Permit (CUP), which has been analyzed for both general and technical compliance pursuant to the provisions found in Sec. 29-6.4(m)(2)(i) and (iii) of the UDC. Staff's analysis of these provisions is shown below. The owner's analysis of the criteria is attached to this report.

### Sec. 29-6.4(2)(i) General CUP Review Criteria:

#### **(A) The proposed conditional use complies with all standards and provisions in this chapter applicable to the base and overlay zone district where the property is located;**

A short-term rental that is not a long-term resident's primary residence or to be operated for up to 210 nights in a residential district is subject to approval of a CUP. The submitted application does not illustrate complete compliance with the minimum regulatory standards established within Sec. 29-3.3(vv) of the UDC. The requested number of guests, eight, exceeds the parking capabilities presently on-site. There are currently three parking spaces on-site, which can support six guests. An additional parking space will be required to be installed prior to allowing eight guests; until that time, six guests is the maximum. Additional regulatory review to ensure compliance with the remaining UDC and Rental Unit Conservation Law requirements will occur upon issuance of the CUP and prior to issuance of an STR Certificate of Compliance and business license.

#### **(B) The proposed conditional use is consistent with the city's adopted comprehensive plan;**

The comprehensive plan does not speak directly to the use of residential dwellings for alternative purposes such as an STR; however, does contain policies, strategies, and actions relating to the topics of livable and sustainable neighborhoods, land use and growth management, and economic development. The adoption of the regulatory provisions governing the use of a residential dwelling for STR purposes is seen as addressing several of these policies, strategies, and actions.

With respect to the goal of creating livable and sustainable neighborhoods, approval of the requested CUP would support the mixed-use concepts of Policy # 2, Strategy # 1 (page 144) of the Plan. While this strategy focuses on the concept of creating "nodes" of neighborhood scale commercial and service uses as a high priority, the first "action" within the strategy recommends using planning tools and decision-making to locate small-scale commercial and service businesses adjacent to residential development. STRs have been determined to be a commercial use and offer a "community-wide" service by providing supplemental housing for visitors to Columbia. Staff believes adoption of the STR regulations and their requirement of a CUP are relevant planning and decision-making tools consistent with the intent of this policy and assist to fulfill the idea of supporting mixed-uses within residential neighborhoods.

With respect to land use and growth management, Policy # 3, Strategy # 3 (page 146 of the Plan) would be fulfilled given the regulatory limitations on occupancy and rental nights that are contained within Sec. 29-3.3(vv).

And finally, with respect to economic development, Policy # 3, Strategy # 2 (page 149 of the Plan) would be fulfilled by supporting local entrepreneurial ventures. The adopted regulatory provisions governing the use of a residential dwelling for STR purposes were created with options to allow owners and/or renters the ability to participate in the STR market, subject to reasonable regulation. This ability for participation not

only supports individual entrepreneurial ventures, but also broader city-wide economic objectives relating to tourism and tourism-related activities.

**(C) The proposed conditional use will be in conformance with the character of the adjacent area, within the same zoning district, in which it is located. In making such a determination, consideration may be given to the location, type and height of buildings or structures and the type and extent of landscaping and screening on the site;**

The surrounding R-1 zoned properties are developed with single-family homes and permit a maximum of 3 unrelated occupant when used as a long-term rental. If the requested CUP is approved, for either the six permissible (based on available parking) or eight requested guests (subject to adding one additional parking space) the dwelling would be allowed to accommodate more occupants (between 3 to 5) than allowed in adjacent R-1 dwellings. While approval of the requested CUP at either six or eight guests would result in increased occupancy it is uncertain how this occupancy may impact surrounding development given the dwelling has not previously operated as a short-term rental. Furthermore, dwellings not used for long-term rental are not restricted with respect to occupants and may have a greater number of drivers or activity than the subject dwelling when used for short-term rental purposes. Of the surrounding 19 properties, 11 appear to be owner-occupied. Any potential impacts associated with higher turnover or increased activity may not be noticeable, depending on current usage patterns of nearby properties.

**(D) Adequate access is provided and is designed to prevent traffic hazards and minimize traffic congestion;**

The site is accessed from the south side of Concordia, which is a local residential street. The property currently has three UDC-compliant parking spaces, which are insufficient to meet the parking requirement for six guests. One additional on-site parking space must be added to achieve parking compliance for desired the eight guests; until then, the maximum permitted occupancy would be six guests. Given that this property has never previously operated as a short-term rental, there is no evidence to suggest that authorization to operate would negatively affect existing or future traffic in the area. No sidewalks are installed along Concordia Drive.

**(E) Sufficient infrastructure and services exist to support the proposed use, including, but not limited to, adequate utilities, storm drainage, water, sanitary sewer, electricity, and other infrastructure facilities are provided; and**

The site is sufficiently served with public infrastructure to support its use as an STR. There are no known infrastructure capacity issues associated with the site that would be negatively impacted by the approval of the CUP.

**(F) The proposed conditional use will not cause significant adverse impacts to surrounding properties.**

The subject site is adjacent to single-family dwellings in all directions. In the R-1 zoning district, residential dwellings used as long-term rentals are limited to no more than three unrelated occupants. The requested occupancy would allow between three to five additional individuals beyond what is permitted for a typical long-term rental in the R-1 district. As noted, the primary tenancy within the surrounding dwellings is "owner-occupied" housing, which does not restrict occupancy. This property has never previously operated as a short-term rental; however, it would appear that the dwelling has been a registered long-term rental since 2021 with no known violations or reported issues. As such, there is no evidence to support that the use of the dwelling as a short-term rental would create adverse neighborhood impacts.

Any potential negative impacts can be mitigated through the adopted regulatory provisions that provide a means to report and address violations. The regulations permit the imposition of fines and possible revocation of the STR Certificate of Compliance after 2 verified violations within a 12-month period.

**Sec. 29-6.4(2)(iii) Supplemental STR CUP Review Criteria:**

**(A) Whether the proposed STR is used for any part of the year by the registrant as a residence. If so, for how long?**

The registrant has answered "no" to this question.

**(B) Whether or not there are established STRs within three hundred (300) feet of the proposed STR measured in all directions from property lines “as the crow flies.”**

The registrant has answered “unknown” to this question. Staff did not identify additional licensed or registered STR properties within 300-feet of the dwelling.

**(C) Whether the proposed registrant has previously operated an STR and if such operation has resulted in a history of complaints, a denied STR certificate of compliance, or revocation of an issued STR certificate of compliance.**

The registrant has answered “no” to this question.

**(D) Whether the proposed STR will increase the intensity of the use of the property and cause increased traffic or noise coming from the property.**

The registrant has answered “no” to this question. From a staff perspective, operating the dwelling as transient lodging for up to 210 nights with a maximum of eight guests could result in increased impacts; however, the extent of those impacts is unknown. The level of impact will depend on several factors, including unit desirability, pricing, and occupancy rates. The regulatory framework includes limits on occupancy and rental nights, along with enforcement mechanisms, to help mitigate potential negative effects.

**(E) Whether there is support for the establishment of the proposed STR from neighboring property owners.**

The registrant has replied “yes” to this question. As of writing this report, no letters of support have been received.

## **CONCLUSION**

Staff’s technical review of the application and analysis of the above criteria concludes that approval of a CUP permitting the operation of 2208 Concordia Drive as a 210-night, maximum of eight-guest short-term rental would not meet the regulatory requirements due to insufficient on-site parking, given the site only has three spaces available. Staff, however, finds it appropriate to recommend approval of a CUP authorizing use of the dwelling for up to 210 nights with a maximum of six guests, subject to a condition that occupancy could be increased to eight guests once one additional parking space is added to the property. Approval of a CUP would result in occupancy within the dwelling being between 3 to 5 occupants more than the permitted in surrounding R-1 zoned long-term rental dwellings. Given the lack of identified violations involving this property as a long-term rental since 2021 and no record of previous use as a short-term rental, there is no evidence indicating that authorizing use of the dwelling as a short-term rental would negatively impact the neighborhood aside from periods of increased occupancy.

Approval of the CUP would authorize the applicant to pursue legal licensure of the dwelling as an STR and afford neighbors, as well as the city, additional regulatory tools to ensure compliance with the adopted standards governing STRs.

## **RECOMMENDATION**

Approve the conditional use permit to allow the dwelling at 2208 Concordia Drive to be operated as a STR subject to:

1. The maximum occupancy of six transient guests;
2. A maximum of 210-nights of annual rental usage
3. A maximum of eight transient guests subject to the installation of one additional on-site/off-street UDC-compliant parking space is added to the property

## ATTACHMENTS

1. Locator Maps
2. STR Application
3. Supplemental "Conditional Accessory/Conditional Use Questions"
4. Public Correspondence

## HISTORY

|                                              |                                     |
|----------------------------------------------|-------------------------------------|
| <b>Annexation date</b>                       | 1955                                |
| <b>Zoning District</b>                       | R-1 (One-Family Dwelling)           |
| <b>Land Use Plan designation</b>             | Neighborhood                        |
| <b>Previous Subdivision/Legal Lot Status</b> | Mission Meadows Subdivision Block 1 |

## SITE CHARACTERISTICS

|                               |                                |
|-------------------------------|--------------------------------|
| <b>Area (acres)</b>           | .32 acres                      |
| <b>Topography</b>             | Sloping west to east           |
| <b>Vegetation/Landscaping</b> | Trees and natural ground cover |
| <b>Watershed/Drainage</b>     | County House Branch            |
| <b>Existing structures</b>    | Single-family dwelling         |

## UTILITIES & SERVICES

All utilities and services provided by the City of Columbia

## ACCESS

### Concordia Drive

|                           |                       |
|---------------------------|-----------------------|
| <b>Location</b>           | North of subject site |
| <b>Major Roadway Plan</b> | Local residential     |
| <b>CIP projects</b>       | None                  |
| <b>Sidewalk</b>           | None                  |

## PARKS & RECREATION

|                                |      |
|--------------------------------|------|
| <b>Neighborhood Parks</b>      | None |
| <b>Trails Plan</b>             | None |
| <b>Bicycle/Pedestrian Plan</b> | None |

## PUBLIC NOTIFICATION

|                                             |                                                                            |
|---------------------------------------------|----------------------------------------------------------------------------|
| <b>Public Notification Responses</b>        | 3 general information phone calls                                          |
| <b>Notified neighborhood association(s)</b> | Rockingham Neighborhood Association, Bourn Avenue Neighborhood Association |
| <b>Correspondence received</b>              | None at the time of writing                                                |

21 “public hearing” letters were mailed to property owners and tenants within 185-feet of the subject property. One letter was provided to the Council Ward representative. Two letters were sent to neighborhood associations and homeowners associations within 1,000 feet of the subject site. All “public hearing” letters were distributed on March 23, 2026. The public hearing ad for this matter was placed in the Tribune on March 24, 2026.

**Report prepared by:** Ross Halligan

**Approved by:** Patrick Zenner