

From: [Mackenzie Chase \(ELCA\)](#)
To: [Planning WPC Testimony](#)
Subject: Expedia Group Testimony - Bill 147
Date: Tuesday, June 2, 2026 2:43:19 PM
Attachments: [image001\[93\].png](#)
[060226 - EG Testimony Bill 147, WPC FINAL.pdf](#)

June 2, 2026

Chair Louis Daniele III
Windward Planning Commission
Hawai'i County Council Chambers
25 Aupuni Street
Hilo, Hawai'i 96720

Re: Bill 147

Dear Chair Daniele, Vice Chair Perrin, and members of the Windward Planning Commission,

On behalf of Expedia Group, a family of brands that includes Expedia.com, Hotels.com, and short-term rental leader Vrbo, I'm writing to share comments on Bill 147. Expedia Group welcomes balanced regulation and management of short-term rentals/transient vacation rentals (TVRs) and has worked with municipalities around the world to craft, enact, and enforce laws to regulate vacation rentals.

Definitions, Section 25-1-5

We recommend changing two of the bill's definitions for clarity and consistency with existing statute.

"B&B" or "Bed and breakfast" means a TVR that is located on a building site or lot on which the host resides.

This change will allow hosted TVRs that are in accessory dwelling units or ohana units to operate.

"Host" means a reachable person who is responsible for operating the TVR.

This change will make the definition of host consistent for bed and breakfasts—hosted rentals—and short-term vacation rentals (STVRs)—unhosted rentals. This also aligns with a common understanding of "host".

TVR enforcement; administrative provisions (Section 25-2-)

We recommend you change some of the verbiage in the enforcement statute to clarify when fines for violations may be assessed and who is subject to fines for violations.

"(a) Upon determining that a TVR is in violation of any TVR provision of this chapter, the

director may assess an administrative fine **against the host and owner** for each day in which the violation persists in an amount no greater than twice the highest daily rate at which the TVR has been advertised in the preceding twelve months added to the following:"

The first change illuminates that these hefty administrative fines only apply for TVR violations, not for other provisions of Chapter 25 which include things like the allowable height of a hedge. The second change clarifies that property owners and host/operators are jointly responsible for fines for both B&Bs and STVRs.

Short-term vacation rentals; where permitted; nonconforming use certificate (Section 25-4-)

We appreciate that under subsection (c), nonconforming short-term vacation rentals that were grandfathered to operate outside of allowable zones under Ordinance 18-114 will be able to continue to operate. However, we recommend language be added to ensure that rentals for periods of 30 or more days be allowed to continue to operate by adding a subsection (f):

(f) The owner or host of a TVR in any zone may obtain a nonconforming use certificate if they can demonstrate:

- (i) That the building site was in regular use as a transient vacation rental before the effective date of this ordinance; and
- (ii) That at no time after April 1, 2019 was the transient vacation rental rented for any rental period of thirty days or less

When Hawai'i County passed Ordinance 114 in 2018, rentals of 30 days or more were advised they could continue operations without obtaining a nonconforming use certificate. Creating a new definition of TVR as a rental of less than 180 days without providing an opportunity for 30+ day rentals to continue operations may create legal challenges that could forestall implementation.

Thank you for the opportunity to provide comments. We appreciate your consideration.

Mahalo,

Mackenzie Chase
Regional Manager, Hawai'i
Expedia Group

Mackenzie Chase
Regional Manager | Government and Corporate Affairs

machase@expediagroup.com





June 2, 2026

Chair Louis Daniele III
Windward Planning Commission
Hawai'i County Council Chambers
25 Aupuni Street
Hilo, Hawai'i 96720

Re: Bill 147

Dear Chair Daniele, Vice Chair Perrin, and members of the Windward Planning Commission,

On behalf of Expedia Group, a family of brands that includes Expedia.com, Hotels.com, and short-term rental leader Vrbo, I'm writing to share comments on Bill 147. Expedia Group welcomes balanced regulation and management of short-term rentals/transient vacation rentals (TVRs) and has worked with municipalities around the world to craft, enact, and enforce laws to regulate vacation rentals.

Definitions, Section 25-1-5

We recommend changing two of the bill's definitions for clarity and consistency with existing statute.

"B&B or "Bed and breakfast" means a TVR that is located on a building site or lot on which the host resides.

This change will allow hosted TVRs that are in accessory dwelling units or ohana units to operate.

"Host" means a reachable person who is responsible for operating the TVR.

This change will make the definition of host consistent for bed and breakfasts—hosted rentals—and short-term vacation rentals (STVRs)—unhosted rentals. This also aligns with a common understanding of "host".

TVR enforcement; administrative provisions (Section 25-2-)

We recommend you change some of the verbiage in the enforcement statute to clarify when fines for violations may be assessed and who is subject to fines for violations.



“(a) Upon determining that a TVR is in violation of any TVR provision of this chapter, the director may assess an administrative fine against the host and owner for each day in which the violation persists in an amount no greater than twice the highest daily rate at which the TVR has been advertised in the preceding twelve months added to the following:”

The first change illuminates that these hefty administrative fines only apply for TVR violations, not for other provisions of Chapter 25 which include things like the allowable height of a hedge. The second change clarifies that property owners and host/operators are jointly responsible for fines for both B&Bs and STVRs.

Short-term vacation rentals; where permitted; nonconforming use certificate (Section 25-4-)

We appreciate that under subsection (c), nonconforming short-term vacation rentals that were grandfathered to operate outside of allowable zones under Ordinance 18-114 will be able to continue to operate. However, we recommend language be added to ensure that rentals for periods of 30 or more days be allowed to continue to operate by adding a subsection (f):

(f) The owner or host of a TVR in any zone may obtain a nonconforming use certificate if they can demonstrate:

- (i) That the building site was in regular use as a transient vacation rental before the effective date of this ordinance; and
- (ii) That at no time after April 1, 2019 was the transient vacation rental rented for any rental period of thirty days or less

When Hawai'i County passed Ordinance 114 in 2018, rentals of 30 days or more were advised they could continue operations without obtaining a nonconforming use certificate. Creating a new definition of TVR as a rental of less than 180 days without providing an opportunity for 30+ day rentals to continue operations may create legal challenges that could forestall implementation.

Thank you for the opportunity to provide comments. We appreciate your consideration.

Mahalo,

Mackenzie Chase
Regional Manager, Hawai'i
Expedia Group

