

## CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT  
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# Th9b

**LCP-2-SON-23-0042-1 (Vacation Rental Requirements)**

**April 11, 2024**

**CORRESPONDENCE**

RECEIVED

OCT 25 2023

CALIFORNIA  
COASTAL COMMISSION

Hello,

I hope this letter finds you in good health and high spirits. I am writing to you as a passionate advocate for preserving the vibrant community of Bodega Bay in Sonoma County. I am deeply concerned about the potential impact of recent discussions regarding vacation rentals in this picturesque coastal area.

Bodega Bay, with its serene ambiance and natural beauty, has become a cherished destination for both locals and visitors alike. The unique appeal of this coastal haven lies not only in its landscapes but also in the diverse experiences it offers to people from various socio-economic backgrounds. Vacation rentals, facilitated through platforms like Airbnb and VRBO, have played a pivotal role in ensuring equal access to these experiences.

It is essential to acknowledge that not everyone can afford to maintain a million-dollar house in a coastal region, especially given the economic challenges faced by many individuals and families. Rising living costs, student debt, and existing property tax laws create significant barriers to traditional homeownership. Vacation rentals provide an invaluable opportunity for individuals to enjoy the beauty of Bodega Bay without the financial burden of permanent ownership.


The communal aspect of vacation rentals cannot be overstated. Consider a weekend getaway with friends or family, where the costs, when divided, become reasonable and affordable. These shared experiences foster connections, build relationships, and contribute to the sense of community that makes Bodega Bay a unique and welcoming place.

I am deeply concerned about recent discussions suggesting limitations or bans on vacation rentals in Bodega Bay. Such measures would not only curtail equal access to the coast but also jeopardize the inclusive spirit of our community. I urge you to consider the far-reaching consequences of these decisions. By supporting vacation rentals, you uphold the values of fairness, inclusivity, and community that make Bodega Bay the extraordinary place it is.

I kindly request your support in preserving vacation rentals in Bodega Bay. Let us continue to embrace the shared experiences, connections, and memories that these accommodations facilitate. Your commitment to equal access to coastal experiences will undoubtedly leave a positive legacy for current and future generations in our beloved community.

Thank you for your attention to this matter. I trust you will make a decision that reflects the best interests of all residents and visitors in Bodega Bay, ensuring the preservation of its unique charm and accessibility.

Warm regards,

  
PO Box 2104  
Blm Blm 95442

RECEIVED

OCT 16 2023

CALIFORNIA  
COASTAL COMMISSION

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10-13-23

**Public comment for California Coastal Commission  
North Central Coast**

**From: Sonoma County Coalition of Hosts,  
The Sea Ranch Hosting Coalition,  
Sonoma Coast Vacation Rental Owners**

**Subject:** Sonoma County Proposed Vacation Rental Regulation

Sonoma County seeks approval from the California Coastal Commission for the regulation of Vacation Rentals in the County's Coastal Zone. The proposal regulations comprise a new License, required for all Vacation Rentals and a Zoning Permit, required for new Vacation Rentals. Additionally, one specific requirement of the License related to ownership applies only to new Vacation Rentals.

As you know, the California Coastal Commission exists in large part to preserve access for all Californians to their coast. Indeed the creation of the Coastal Commission stemmed from a dispute over public access to part of the Sonoma County coast in particular.

Campsites and Vacation Rentals form most of the available transient accommodation on the Sonoma coast. There are few hotels or other lodgings. Vacation Rentals have an outsize importance for preserving public access since the Sonoma coast is not easily accessible on a day trip basis for most Californians. As the Commission has previously noted (recently in [1]), it *"has long recognized that STRs can provide a unique and important source of visitor-serving accommodations in the Coastal Zone, especially for larger families and groups, and has typically found that bans or undue restrictions on this type of lodging are inconsistent with Coastal Act and/or LCP policies prioritizing public access and visitor-serving uses."*

Despite this background, Sonoma County has conducted no study and offers no evidence of the impact of their proposed policies on public access to the coast. The County simply states, without evidence or even argument, that *"this Amendment conforms to the Local Coastal Program, in that it does not negatively impact public coastal access"*. [2] However, they simply do not know (or at least have not shared) how many properties would be impacted and how many visitor-nights of accommodation would be lost.

In fact, the policies will *obviously* negatively impact public access through restrictions on Vacation Rental ownership, structures in which Vacation Rentals may be operated and occupancy restrictions. The question is not **whether**, but only **how much**.

On the other hand, the policies do exempt existing rentals from the restrictive aspects of the regulations. As a result, any impact on public access will take place slowly - perhaps very slowly - as existing rentals cease operation or change hands and new ones are established.

At the very least, the County should have **a plan for monitoring the impact of the policy on public access** over time. This must be transparent to the Coastal Commission and public. It should include publication of data, readily accessible to the general public, on Vacation Rental activity in the Coastal Zone, including:

- Number of licenses issued and revoked each year
- Number of licenses actually in use (per TOT records)
- Number of Zoning Permits
- Number of Zoning Permits actually in use (per TOT records)
- Total rented nights each year (per TOT records) for permitted and unpermitted properties
- Total rented person-nights each year (per TOT records based on maximum occupancy) for permitted and unpermitted properties
- Total available person-nights each year (based on maximum occupancy of in-use licenses) for permitted and unpermitted properties
- Number of complaints received by the County hotline by zip code
- Fraction of complaints satisfactorily resolved
- Number of enforcement actions
- Number of unique properties subject to complaints
- Number of unique properties subject to enforcement actions

The above data should be available by zip code or smaller geographic subdivision.

These data would allow the Coastal Commission, the County and the public to observe the impact of the new policies by comparing the above metrics between permitted (new) and unpermitted (existing) properties over time. Over a small number of years it should be possible to estimate the long-term impact, either re-assuring the Commission and the public that public access is preserved or allowing the County to change course in good time, if necessary.

Outside of the Coastal Zone, Sonoma County has a recent track record of imposing stringent restrictions on the number of allowed Vacation Rentals without any study or

attention to the impact on visitor numbers and the associated economic impacts. The County has imposed caps or bans on Vacation Rentals in traditionally mostly residential areas and areas that are traditionally vacation hotspots alike. The County shows a complete disregard for the impacts of dramatically reducing visitor-serving accommodation. **We see no reason to expect their approach to be different on the Coast, as evidenced by the complete lack of study of these proposed policies.**

We urge the Commission to **require** such data collection and publication as a **condition of approval** for these unstudied policies. The Commission should not allow policies with the potential to significantly curtail public access to the Coast to go into effect without an assurance that the effects over time can be reliably observed and corrective action taken if there are unintended consequences.

[1] <https://documents.coastal.ca.gov/reports/2023/3/W14b/W14b-3-2023-report.pdf>

[2]

<https://sonoma-county.legistar.com/View.ashx?M=F&ID=11094383&GUID=E57424C5-56A3-4ACC-B056-46BD2A035670>