

CALIFORNIA COASTAL COMMISSION

NORTH CENTRAL COAST DISTRICT
455 MARKET STREET, SUITE 300
SAN FRANCISCO, CA 94105
PHONE: (415) 904-5260
FAX: (415) 904-5400
WEB: WWW.COASTAL.CA.GOV



Th9b

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

April 11, 2024

CORRESPONDENCE



@better_LA
betternighborsla.org

April 5, 2024

VIA EMAIL

California Coastal Commission
45 Fremont Street #2000
San Francisco, CA 94105
NorthCentralCoast@coastal.ca.gov

RE: Public Comment on April 11, 2024 Thursday Agenda Item 9.b. Sonoma County LCP Amendment (“LCPA”) Request No. LCP-2-SON-23-0042-1 (Vacation Rental Requirements)

Dear Honorable Chair Hart and Commissioners,

Better Neighbors Los Angeles is a coalition of hosts, tenants, housing activists, hotel workers, and community members. We conduct data analysis and research on the short-term rental industry in the Coastal Zone, including relatively recent California Coastal Commission (“Commission”) decisions on Local Coastal Program Amendments (“LCPAs”) regulating short-term rentals (“STRs”), also known as vacation rentals. To that end, Better Neighbors LA writes to request that the Commission amend Sonoma County’s proposed LCPA to allow only true home-sharing in hosted only rentals within the Coastal Zone. While the staff report remarks that the County will likely come back to the Commission with additional regulations at a future date, it provides the County with little guidance in line with the Commission’s stated goal of mitigating the impact of STRs on housing and low cost overnight accommodations. The definition section of the proposed amendment provides an opportunity for the Commission to pursue a hosted-only policy preemptively given the significant unhosted short-term rental market in Sonoma’s Coastal Zone. Moreover, the Staff Report could also provide guidance on the type of data it expects the County to provide to demonstrate the average daily rate (“ADR”) of its STRs and how those prices compare to other overnight accommodations in the region. Pub. Res. Code §30213.

Overconcentration of Short-Term Rentals in Sonoma Coastal Zone

According to Better Neighbors data analysis of AirDNA data, between March 2017 and March 2023, unhosted short-term rentals grew 160% within unincorporated Sonoma County’s Coastal Zone, comprising 481 as of March of last year.¹ In effect, unhosted short-term rentals take up approximately 16.45% of the total housing stock within this jurisdiction. By comparison,

¹ Data on file with BNLA.

unhosted short-term rentals in the inland portion of Sonoma County, which has various area caps on short-term rentals at approximately 5% to 10% of the housing stock, comprise 4% of the total housing stock. Please see an area breakdown below.

Sonoma County Active Short-Term Rentals as of March 2023²

| Locality | Number of Active Unhosted STRs* | Number of Housing Units | % of Housing Stock |
|---|---------------------------------|-------------------------|--------------------|
| Bodega Bay | 164 | 818 | 20% |
| Carmet | 10 | 69 | 14% |
| Jenner | 25 | 69 | 36% |
| Salmon Creek | 18 | 132 | 14% |
| Sea Ranch | 263 | 1836 | 14% |
| Valley Ford | 1 | 60 | 2% |
| <i>Coastal Communities Total</i> | <i>481</i> | <i>2924</i> | <i>16%</i> |
| Bloomfield | 1 | 110 | 1% |
| Bodega | 4 | 130 | 3% |
| Boyes Hot Springs | 54 | 2714 | 2% |
| Cazadero | 24 | 295 | 8% |
| El Verano | 20 | 1205 | 2% |
| Eldridge | 6 | 321 | 2% |
| Fetters Hot Springs-Agua Caliente | 71 | 1352 | 5% |
| Forestville | 43 | 1566 | 3% |
| Fulton | 1 | 256 | 0% |
| Geyserville | 19 | 377 | 5% |
| Glen Ellen | 35 | 616 | 6% |
| Graton | 16 | 732 | 2% |
| Guerneville | 287 | 3182 | 9% |
| Kenwood | 42 | 466 | 9% |
| Larkfield-Wikiup | 8 | 3097 | 0% |
| Monte Rio | 103 | 802 | 13% |
| Occidental | 14 | 802 | 2% |
| Penngrove | 10 | 1094 | 1% |
| Sereno del Mar | 26 | 177 | 15% |
| Timber Cove | 26 | 204 | 13% |
| <i>Outside of CZ Total</i> | <i>810</i> | <i>19498</i> | <i>4%</i> |

This data illustrates that short-term rentals have gradually become overly concentrated within Sonoma County's Coastal Zone, contributing to the corporatization of housing in one of the most expensive regions in California. According to the Sonoma County Housing Element 2023-2031,

² Data provided by AirDNA, March 2023.

the County has identified the negative impacts short-term rentals have had on residential housing stock:

“Sonoma County continues to experience an increase in the use of permanent residential units and lands for vacation uses, such as when single-family homes are removed from the housing stock to be utilized as short-term rentals. This trend has led to a loss of the county's scarce urban residential homes and lands to visitor-serving uses. Many vacation homes are purchased as second homes for later retirement and rented as furnished vacation rentals when not used by the owner. Census data show that the number of homes in the Unincorporated County that are used for seasonal or recreational use increased from 9.4% (of total housing stock) in 2010 to 10.9% in 2019, and from 4.05% to 4.22% within the incorporated cities. The County adopted a vacation rental ordinance in 2011 to regulate the use of homes as vacation rentals and recently amended the vacation rental ordinance to provide more effective enforcement measures. Continued restrictions on the conversion of housing stock and urban residential lands to visitor-serving uses and investment uses will be needed to ensure that the existing housing stock is protected.”³

Without an ordinance limited to true home-sharing, and with no cap in place for unhosted short-term rentals within the Coastal Zone, it is likely that even more existing housing will be cannibalized into tourist serving accommodations within Sonoma County's Coastal Zone in the coming years.

Unhosted Short-Term Rentals Likely Exacerbate High Housing Costs

As unhosted short-term rentals occupy a significant portion of the long-term housing market, Sonoma residents continue to face high housing costs and a lack of affordable housing. According to the National Low Income Housing Coalition, between 2019 and 2023, the fair market rent for a two-bedroom unit increased \$365, totaling \$2,252 in 2023.⁴ Meanwhile, between March 2017 and March 2023, unhosted short-term rentals grew 160%. While one cannot say for certain, past research in cities like Los Angeles indicate that unhosted short-term rentals likely contributed to an increase in housing costs.⁵ According to Professor David Wachsmuth of McGill University, in the City of Los Angeles short-term rentals contributed to an increase in rents by \$810 on average per year since 2015.⁶ While one may argue the differences between the City of Los Angeles and Sonoma County, one cannot argue that both are not facing an unprecedented housing crisis.

3

<https://permitsonoma.org/Microsites/Permit%20Sonoma/Documents/Long%20Range%20Plans/Proposed%20Plans/Housing%20Element/Sonoma-County-Certified-Housing-Element-Adopted-2023-08-22.pdf>

⁴ In 2019, the average cost for two-bedroom was \$1,887:

https://reports.nlihc.org/sites/default/files/oor/OOR_2019_REPORT.pdf; 2023:

https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁵ According to Professor David Wachsmuth of McGill University, since 2015 short-term rentals contributed to an increase in \$810 in rents on average per year in the City of Los Angeles, https://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf.

⁶ https://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

Precedent for Hosted Only Policy in Sonoma County

In March 2023, the Commission took a critical step in preserving long-term housing in the City of Half Moon Bay by approving short-term rental regulations that included a primary residency requirement for all hosts and capped the number of nights an unhosted short-term rental may operate to 60 per calendar year.⁷ Following this hearing, in December 2023, the Commission held an informational briefing on housing during which Professor David Wachsmuth of McGill University recommended that “[t]he CCC should consider establishing a common regulatory floor that restricts unhosted STRs and encourages home sharing in the coastal zone, to better preserve public access for visitors...”⁸ During the hearing, several Commissioners expressed their concern regarding the short-term rental issue and consideration of Professor Wachsmuth’s findings.

Sonoma County presents the Commission with a unique opportunity to proactively regulate short-term rentals in a way that safeguards long-term housing, particularly for tenants. Studies indicate that strict short-term rental regulations can help decrease rental costs. According to a 2023 study in the Real Estate Economics Journal, rental prices decreased 3% after the City of Irvine prohibited short-term rentals in residential zones and enforced the regulations.⁹ While the City of Irvine proposed a much stricter ban than currently considered in Sonoma County, BNLA believes a hosted only policy strikes the balance needed to adequately provide coastal public access as mandated by the Coastal Act.

The Commission Must Ensure STR Affordability

Short-term rentals must be affordable to increase access to the coast for persons of low to moderate income. Pub. Res. Code §30213. Staff should encourage the City to analyze the impact short-term rental regulations will have on coastal access for low to moderate income visitors by comparing the average nightly cost of short-term rentals to the average nightly cost of existing lower-cost coastal accommodations in the region. The Commission has taken a similar approach in their interpretation of California Public Resource Code § 30213 when evaluating hotel developments. The short-term rental industry, as a part of the overnight accommodation industry, must be treated no different. According to our analysis of AirDNA data, the average daily rate of an unhosted short-term rental in unincorporated Sonoma County’s Coastal Zone is \$449.45 per night in March 2023. Meanwhile, the average daily rate of a hotel or motel is \$266.50, according to an inventory of hotels and motels within unincorporated Sonoma County’s Coastal Zone.¹⁰ The \$182.95 difference illustrates that on the whole, unhosted short-term rentals are not affordable overnight accommodation options in this area. The Commission has notably used luxury hotel development to win in lieu fees and other infrastructure and public access improvements. No such tangible community benefit comes with the approval of STR LCPAs and

⁷ City of Half Moon Bay LCP-2-HMB-21-0078-2 (Short Term Rentals and Home Occupations), approved March 8, 2023, <https://documents.coastal.ca.gov/reports/2023/3/W14b/W14b-3-2023-report.pdf>.

⁸ Professor David Wachsmuth, “Short-Term Rentals and Housing: What Are the Issues and What Should We Do?,” December 14, 2023, slide 23 of PowerPoint presentation linked here: https://cal-span.org/meeting/ccc_20231214/

⁹ <https://onlinelibrary.wiley.com/doi/abs/10.1111/1540-6229.12440>

¹⁰ Inventory on file with BNLA. Average daily rate compiled for rate listed as of April 2024.

the Commission should take pause before ushering in highly priced STRs at the expense of a jurisdiction's housing supply. The Commission has often bemoaned its inability to set room rates to preserve coastal access, and even so, has yet to recommend that a local jurisdiction require on-site hosts, which has effectively kept prices down in cities like Santa Monica.

Conclusion

As the Commission continues to grapple with addressing the housing affordability crisis, BNLA believes restricting unhosted short-term rentals provides the Commission with an avenue to address this crisis within your jurisdiction. For these reasons, BNLA requests the Commission amend the Sonoma County LCP to permit only hosted short-term rentals. Should you have any questions, please contact Becca Ayala at rebecca@betterneighborsla.org.

Sincerely,

/s/ Randy Renick

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

Hello,

CALIFORNIA
COASTAL COMMISSION

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,



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>

FW: Public Comment on April 2024 Agenda Item Thursday 9b - Sonoma County LCP Amendment Number LCP-2-SON-23-0042-1 (Vacation Rental Requirements).

Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>

Fri 4/5/2024 9:03 AM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

From: KENNETH D MOULDER <kennydean2@sbcglobal.net>

Sent: Thursday, April 4, 2024 3:23 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Cc: James Docker <tsrdock@mcn.org>

Subject: Fwd: Public Comment on April 2024 Agenda Item Thursday 9b - Sonoma County LCP Amendment Number LCP-2-SON-23-0042-1 (Vacation Rental Requirements).

Dear CCC,

I strongly support the passion LCP-2-SON-23-0042-1. For all the reasons stated by Mr. Docker below.

Sent from my iPhone

Begin forwarded message:

From: James Docker <tsrdock@mcn.org>

Date: April 4, 2024 at 1:42:51 PM PDT

To: Akiko Docker <asdock@mcn.org>, Paul White <paulfrederickwhite@gmail.com>, Doug Goodman <djgoodman1@comcast.net>, Louise DeWilder <louisedewilder@earthlink.net>, Paul Batchelder <batch02@aol.com>, Phil Roberts <filbert@mcn.org>

Cc: Fumiko Docker <fumi@trichomearchitects.com>, KENNETH D MOULDER <kennydean2@sbcglobal.net>, Bette Covington <bcov@mcn.org>

Subject: Fwd: Public Comment on April 2024 Agenda Item Thursday 9b - Sonoma County LCP Amendment Number LCP-2-SON-23-0042-1 (Vacation Rental Requirements).

Time to send comments to CCC before tomorrow at 5PM deadline for the CCC to read them before 4-11 meeting. We just sent this.

Begin forwarded message:

From: James Docker <tsrdock@mcn.org>

Subject: Public Comment on April 2024 Agenda Item Thursday 9b - Sonoma County LCP Amendment Number LCP-2-SON-23-0042-1 (Vacation Rental Requirements).

Date: April 4, 2024 at 1:33:24 PM PDT

To: NorthCentralCoast@coastal.ca.gov

Dear CCC,

We have been full time residents of The Sea Ranch since 1992, save for a brief absence for medical reasons.

We strongly support the CCC approving Sonoma County ordinance regarding STR's in the coastal zone. As have so many, we first visited TSR renting houses. We do support rental homes at TSR.

What we oppose are no requirements at all being placed upon TSR owners who wish to rent their homes short term, less than 30 days at a time. There appear to be multiple owners at TSR who own multiple homes as STRs. The new ordinance is a direct threat to their operating an STR 'rental business' at TSR. This group represents itself as 'The Hosting Coalition' and asks the CCC for a no vote.

The TSR CCR's in our understanding encouraged owners renting of homes from 'time to time'. However, we doubt the CCR docs anticipated owners owning multiple homes and operating a 'rental business' here.

The number of homes rented as STRs at TSR has not changed much, about 360 units over the recent past. What has changed is the volume of people, numbers, renting a home. Some estimate 50K visitors a year spend time 'short term' here. This no doubt has major impacts of consequence on TSRA infrastructure, recreational facilities and trails. What financial impacts the visits and facilities usage has on TSR Assoc., it's members, maintenance budgets has not been calculated. And additionally, a voluntary fee is asked by TSRA of those renting their homes as STRs, yet the payment of such to TSRA is often ignored we understand.

As noted above, while not opposing Short Term Rentals, some measures of restraint should apply to those who operate STRs here at The Sea Ranch as a business, we believe.

Therefore again, we whole heartedly support a yes vote on LCP-2-SON-23-0042-1, vacation rental requirements for Sonoma County coastal zone.

We appreciate your taking the time to read this email and thank you in advance for your yes vote.

Sincerely,

James & Akiko Docker
Ranchers since 1992
41517 Raven Ct.
35A-105
The Sea Ranch, CA

FW: comment on vacation rental proposal for coastal zone in Sonoma County

Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>

Thu 4/4/2024 2:49 PM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

From: Deborah Eppstein <deppstein@gmail.com>

Sent: Wednesday, April 3, 2024 7:20 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Subject: Re: comment on vacation rental proposal for coastal zone in Sonoma County

This is for April 2024 Agenda Item Thursday 9b - Sonoma County LCP Amendment Number LCP-2-SON-23-0042-1 (Vacation Rental Requirements)

On Apr 3, 2024, at 2:10 PM, Deborah Eppstein <deppstein@gmail.com> wrote:

Re: Proposed Short Term Vacation Rental Ordinance for the Coastal Zone in Sonoma County

The Sea Ranch was developed as a planned mixed-use community starting in the 1970s. Its goals included providing homes for short-term vacation rentals, as well as second homes for some and full-time homes for others, all while preserving the Coastline, providing access to the coast to the public, and making homes in harmony with the surroundings (muted gray and brown colors, 1-2 story, home design blending with the landscape, all with only native vegetation). The Sea Ranch has very strict CC&Rs, which already regulate most if not all of the items you wish to regulate with the proposed Vacation Rental Ordinance for the Coastal Zone. Thus there currently are noise laws, quiet hours rules, regulations that outdoor lighting be only downward facing, regulations on parking only in designated parking spaces on the premises and not even on any private street, regulations for no RV parking even on the owner's premises, 25 mph speed limit throughout, and many more regulations. The Sea Ranch employs its own security guards, with security vehicles frequenting all of its streets multiple times every day and night. Complaints for disturbances can be called in 24/7 with rapid response from the security force. The owners of the homes pay a monthly fee to provide for all of this- to maintain the private roads and the shared common areas, to enforce the CC&Rs, and to employ the

security force, among other amenities to achieve a safe, respectful and enjoyable stay for all- this includes those using a short-term vacation rental, those enjoying a second home, and those who are full-time residents.

This is working.

Imposing yet another set of county regulations on top of the more extensive regulations already in place through The Sea Ranch CC&Rs and the **County Transient Occupancy Tax regulations**, as well as including requirements for a new business license is both unnecessary and not good use of county taxpayer funds to administer and monitor such.

The Sea Ranch Association is already monitoring short term vacation rentals in a much stricter manner. It is also overly burdensome for property owners who already pay CC&R fees to ensure compliance throughout the community.

Furthermore, please understand that not all vacation rentals are alike.

Situations where the homeowner lives in the home and occasionally **rents it out** when they are traveling are very different from full-time vacation rentals that are managed by a rental company and are not occupied by the owner. I urge you not to impose a vacation rental ordinance for the The Sea Ranch Coastal Zone. However, if you do decide to impose such a vacation rental ordinance that includes The Sea Ranch, please exclude those homes where the home owner resides themselves and that are rented out less than 120 days a year. Quite a few people moved up here after losing homes in the Tubbs and Glass Fires. Allowing homeowners to manage their own short-term rentals helps cover some of the high fixed costs for the community infrastructure and security, high maintenance costs due to the often harsh coastal weather, and also high property taxes.

Thank you for considering these comments.

Sincerely,
Deborah Eppstein, PhD
384 Main Sail
The Sea Ranch

Deborah Eppstein
deppstein@gmail.com

FW: Th9b public comment - Fw: Objections to the certification of the Sonoma County vacation rental Ordinance

Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>

Fri 3/29/2024 9:11 AM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

From: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

Sent: Thursday, March 28, 2024 9:39 AM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Subject: Th9b public comment - Fw: Objections to the certification of the Sonoma County vacation rental Ordinance

From: i C <hachmyer@netscape.com>

Sent: Thursday, March 28, 2024 8:30 AM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

Subject: Objections to the certification of the Sonoma County vacation rental Ordinance

Mr. Henningsen, Today I forwarded to you by mail documents in support of my position and arguments that coastal zone vacation rentals should not be subject to the provisions of the Sonoma County vacation rental Ordinance.

This is based primarily on the fact said Ordinance was enacted to, and will, discourage the establishment and operation of vacation rentals.

While that may have been and appropriate purpose for some areas of Sonoma County, it does not apply to circumstances that exist in the coastal zone. Hence, given the provisions of the Coastal Act of 1976, that Ordinance constitutes a prima facie violation of those provisions and should not be certified by the Coastal Commission.

The Ordinance evolved from the County's need to accomodate two competing factions: 1) public outrage re: vacation rentals in their quiet and peaceful neighborhoods, and 2) property owners need for additional income and the County's need to support tourism. I have attached a couple of newspaper accounts that adequately demonstrates Permit Sonoma's and the Board of Supervisor's dilemma. The resulting Ordinance, which leans heavily towards public complaints, I believe, will discourage the establishment and operation of vacation rentals. A circumstance fatal to certification by the Coastal Commission.

There are additional basis for denying Certification, e.g. lack of jurisdiction, no "need" or requests from the Coastal Commission, the County's stated motive for seeking control of coastal zone vacation rentals, etc. I do so simply to avoid foreclosure of those grounds in the future.

You may already have most of the documents I have forwarded if Peter has provided them to the Commission prior to leaving.

In any event, I thank you so much for your help in bringing me up to speed on this issue, and I thank you and the Commission, in advance, for your consideration of my concerns regarding the health of vacation rentals in the coastal zone. I really believe coastal zone vacation rentals

and coastal tourism will be negatively impacted if subjected to the provisions of the Sonoma County Vacation Rental Ordinance. I KNOW MINE WILL BE!

Thank you.

Barry Hachmyer

FW: Sonoma County LCP amendment LCP-2-SON-23-0042-1

Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>

Tue 4/2/2024 9:26 AM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

From: Mark Watson <markwatson@cantab.net>

Sent: Friday, March 29, 2024 7:34 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Subject: Sonoma County LCP amendment LCP-2-SON-23-0042-1

Hi,

I wanted to alert you to a factual error in the Staff Report (Th9b) for this item for your April 11 Meeting and provide a short comment.

The report states that Sonoma's amendment would "*limit VR licenses to one per residential property owner*" (Page 3, last paragraph). In fact the proposed regulation is stricter than this in a not insignificant way.

Whilst Sonoma have repeatedly represented to the public that their policy would allow one license per person, it does not: instead it allows the joint owners of a property to hold one license **between them**. For example, a couple who jointly own a property may hold a license for that property and no other properties. The policy as represented by Sonoma and as written in your report would allow the couple to hold 2 licenses.

Whilst this may seem a small difference, it will undoubtedly be significant for someone, forcing them to needlessly change their ownership arrangements, to their potential financial detriment. The County should not enact and the Commission should not Certify such pointless bureaucracy.

I urge you to reconsider unconditional approval of these policies the effect of which is unstudied and unknown. You rightly point out "*the limited number of 'standard' commercial hotel/motel overnight accommodation options,*" in this area. The Commission cannot uphold its mission to maintain public access to the coast if it gives unconditional approval to policies with uncertain and unstudied impact.

Please ensure that approval is conditional on the Country adequately monitoring the impact of their policies with an opportunity for CCC review should there be unexpected and unintended (or intended) consequences for public access.

Best regards,

Mark Watson

FW: Support Sonoma County's Vacation Rental Ordinance

Travis, Galen@Coastal <Galen.Travis@coastal.ca.gov>

Fri 4/5/2024 4:41 PM

To: Henningsen, Luke@Coastal <luke.henningsen@coastal.ca.gov>

-----Original Message-----

From: Louise DeWilder <louisedewilder@earthlink.net>

Sent: Friday, April 5, 2024 4:03 PM

To: NorthCentralCoast@Coastal <NorthCentralCoast@coastal.ca.gov>

Subject: Support Sonoma County's Vacation Rental Ordinance

I strongly urge the California Coastal Commission to support the Sonoma County amendment to include Sea Ranch in the inland vacation rental regulations. As a full time resident, I value Sea Ranch as a calm, neighborhood community. Sea Ranch needs the strong Sonoma County regulations and enforcement mechanisms to prevent it from becoming a raucous resort and being detrimental to environmental sensitivity.

Thank you,

Louise DeWilder

160 Sounding, Sea Ranch, CA 95497

Owner since 1985