

**From:** [Carolyn](#)  
**To:** [Planning Clerk](#); [Ford, John](#); [McNamara, Cade](#)  
**Cc:** [Madrone, Steve](#); [Wilson, Mike](#)  
**Subject:** Comments on 10-26-23 Draft Revisions to STR Ordinance  
**Date:** Wednesday, October 25, 2023 12:39:45 PM

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Dear Commissioners,

I will be out of town on Thursday Oct 26, 2023, and unable to attend the meeting on the Short Term Rental (STR) ordinance.

Please accept these comments as you consider your recommendations.

## 1. Noise

### **Use of Decibel Levels to Measure Noise is Ineffective**

Please reduce the noise level limit of 60 dB during nighttime hours to 30 dB or eliminate it completely and require “quiet hours” between 10pm and 8 am. 60 dB appears to be an arbitrary number with little thought given to the potential sleep disruption of neighbors who could be subjected to this level of outside noise during the night. A search of what 60 dB sounds like reveals that it is "as loud as a normal conversation between two people sitting at a distance of about one meter (3 ¼ feet). It is the average sound level of a restaurant or an office.” [See: <https://decibelpro.app/blog/how-loud-is-60-db-compared-to-other-volumes/>] Sounds carry. Guests of a short term rental carrying on outside conversations at night near an adjacent property would easily disrupt the sleep of those neighbors. Some properties are only separated by five foot setbacks. Bedroom windows could be mere feet away from where this provision would allow “the sounds of offices or restaurants.” The 60 dB measurement is unreasonable and will only create conflict between the owner and the neighbor in populated neighborhoods.

### **Prohibit Fireworks**

Please prohibit the use of fireworks in all Short Term Rental properties.

## 2. Parties

### **Prohibit Parties in all Short Term Rentals**

Allowing parties is contrary to the AirBnB company's own guidelines for owners. AirBnB expressly bans parties in their short term rentals: <https://news.airbnb.com/official-codification-of-party-ban/> Disruptive gatherings are prohibited regardless of size: <https://www.airbnb.com/help/article/3345>

Parties of up to 20 people per STR especially in the densely populated neighborhoods of the county without limit to the number or the frequency of these parties is guaranteed to cause neighborhood conflict and is inconsistent with the effort by the AirBnB company to ban parties and protect neighborhoods from the negative impact of short term rentals on peace and

quiet and the character of neighborhoods.

After two hours researching other short term rental ordinances up and down the coast of California I could find none that allowed parties. It is unclear why Humboldt County would choose to be an outlier in this regard and subject neighbors to this kind of disturbance. It would also seem to create a problem for owners who choose to prohibit parties by giving guests the ability to push back on these prohibitions. If the county expressly allows parties by ordinance, doesn't that make it more difficult for the owner to prohibit them? The AirBnB website even has ways for neighbors to lodge complaints when hosts allow parties.

If the reason for allowing parties is that they would have little impact in the larger rural properties in the county, then please consider prohibiting them in the more urban neighborhoods of the county.

### **3. Non-Transferable**

#### **Retain Provision that STR Permits are Non-Transferable**

The provision that STR permits are non-transferable does two things. It prevents the STR permit from becoming a business commodity. It also allows other property owners to have a chance to enter the STR market. It does not prevent a new owner from simply applying for a new STR permit should they wish to continue using the property in that manner.

The new alternative to allow "next of kin" to inherit the STR permit would seemingly create a revolving door of inheritees preventing the property from returning to long term residential use for the foreseeable future.

Thank you for considering these comments. I appreciate the careful consideration the Commissioners are giving to this ordinance.

Sincerely,

Carolyn Ruth