

From: [Will Suiter](#)
To: [Planning Clerk](#); [Hilton, Keenan](#)
Cc: [Arroyo, Natalie](#); [Bushnell, Michelle](#); [Wilson, Mike](#); [Madrone, Steve](#); [Bohn, Rex](#)
Subject: Short Term Rental Regulation Public Comment
Date: Thursday, September 21, 2023 5:16:43 PM

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Hello,

Please see my comments below in regards to the latest STR ordinance (coastal ordinance) and the proposed workshop on Thursday, September 21, 2023. I would like to include the following points in the event I am not able to attend or if the workshop is unable to be held due to a large number of items on the consent calendar.

The argument is often made that short term rentals provide an attraction to visitors and tourists seeking a unique experience- and this may be true in a vacuum- but **the people who are most affected by the housing shortage, which short term rentals contribute to, are the people who play a vital role in making Humboldt County a desirable destination for visitors in the first place. Artists, parks and recreation workers, educators, and others who contribute massively to the cultural and natural resources in our area are being priced out.**

I am personally a case study for this, as a working artist who is fortunate enough to have recently found stable housing in Bayside as a long term renter, in an ADU that was formerly a short term AirBNB rental. I was seriously considering moving out of Humboldt County after 6+ years due to the lack of affordable and available housing. Because I was able to move into a former STR, I can continue to participate in local art and cultural events that attract visitors and economic development, like the North Country Fair, Eureka Friday Night Markets, and others.

While there is a surface level appeal to the experience that a short term rental could provide to visitors, **it is not worth the harm caused by removing housing stock from the community that calls Humboldt County home.** Incidentally, I also believe that eliminating or restricting STRs would also have the benefit of facilitating opportunity for local entrepreneurship and innovation, through revitalizing existing structures and businesses to provide a unique and attractive lodging option to visitors; Humboldt Bay Social Club, Eagle House Inn, and Scotia Lodge are all examples of independent local businesses that have recently created high quality lodging for visitors, without removing existing housing stock from the community in the way that STRs do.

STR Remove Housing Stock for the community. It is proven that short-term rentals take away opportunities for community members to purchase starter homes and find affordable rentals which has a rippling effect in the fabric of our community and our local economy. If our workforce can't afford to live close by, it means more money and time is being spent commuting, and our neighborhoods become devoid of community.

2.

STR are not being regulated appropriately to prevent "mom-and-pop" hotel chains from developing. The latest text includes

"61.05.10.2.3 Per Person Limit. An individual or business shall not own more than five (5) parcels with Short-term Rental permits."

This would allow property owners five individual homes to rent out as short term rentals. I believe this is far too great of a number and should be reduced to 1 or 0. The regulations make no designation on the limit when compared in family trusts, organizations owned by the same entity or individual and leaves a loophole open for larger STR owners to divide holdings between different companies to continue to operate large numbers of STRs. Cumulatively, the number of STRs in our county represent:

381 active listings in Eureka, average **annual revenue of \$43.3K per rental**
317 active listings in Arcata, average **annual revenue of \$41.4K per rental**
192 active listings in Trinidad, average **annual revenue of \$82.9K per rental**
197 active listings in McKinleyville, average **annual revenue of \$54.5K per rental**

(data from AirDNA.co)

This represents a total of **1087 homes that could re-enter the market as long term rentals or homes for first time homebuyers.**

I support an ordinance that only allows for "Home-share" STR and would eliminate 61.05.10 Short-term Rentals defined as entire homes without a caretaker or resident. This would open hundreds if not thousands of homes up to first time home buyers and long-term renters in our community who currently need homes or are seeking upward home mobility.

3.

If Short term rentals are continued to be regulated, I support additional STR permit fees and additional taxes should be levied to support a housing trust fund to directly support community members including: rental assistance, first-time home buyers and tax benefits for STR owners who voluntarily convert their STR into long-term rentals or sell their STR properties.

4.

61.05.5 Existing Operations. No permits for whole dwelling unit Short-term Rentals shall be issued during the first two (2) months following the effective date of this section but applications from individuals operating existing short-term rentals will be received. Two months after the effective date of this ordinance the department will issue permits prioritizing applications for locations with existing Short-term Rentals. An existing Short-term Rental shall be determined based on evidence of operation from January 2022 through May of 2023. If the number of permits issued for existing Short-term Rentals exceeds the cap identified in §60.05.10.2.1, then no permits will be issued for new Short-term Rentals until the number of permitted Short-term Rentals in the County falls below the cap.

This text would cause a huge rush in new UNREGULATED STR to enter the market in order for their application to be considered. This is because the current cap set for STRs is below the current number of STRs in existence

>> Looking at other areas of the nation and world that have dealt with the issues of STRs, it is in our best interest as a community to eliminate STRs entirely. Short of that, no preferences should be made for existing short term rentals and we should seek to limit the number of short term rentals as much as possible in order to **increase the amount of housing stock available to our community for first time home buyers and for long term rentals to re-enter the market.**

Thank you for your consideration.

Will Suiter

Bayside Resident + Arcata Business Owner