

Comments on Draft Short-term Rental Ordinance_Coastal 9.15.23

I appreciate the work of planning staff to continue improving the short term rental ordinance.

I like that the requirements for the Home-Share Rental (HSR) have been simplified even further, e.g. not having to distribute a good neighbor guide. That they are not subject to a cap. And that they will be able to get permitted immediately after the ordinance is adopted.

I still have several concerns and suggestions regarding Short Term Rentals (STR) i.e., whole dwelling units.

Located on an Owner Occupied Parcel Vs Non-Owner Occupied Parcel

I believe owner occupied parcels should receive preference in permitting over non-owner occupied parcels.

Owner occupied parcels are much more likely to preserve neighborhood quality and reduce public nuisance.

More of the income derived is likely to stay in Humboldt County supporting our local economy. Rather than the majority of it being exported elsewhere.

I envision scenarios where there will be competition for permits between rentals on owner occupied parcels and rentals on non-owner occupied parcels due to neighborhood concentration limits and cap limits.

As concerns the 2% cap, shouldn't existing rentals on owner occupied parcels be given permits prior to rentals on non-owner occupied parcels?

Or with neighborhood concentration, if they each have an existing rental on parcels within the nearest 10 dwelling units as the crow flies or exceed 10% on the street will they both have to apply for a special permit? Shouldn't the rental on the owner occupied parcel receive priority and receive an administrative permit?

If the cap is reached and there is a wait list, shouldn't rentals on owner occupied parcels receive them first?

Yes, it adds an extra permitting requirement to prove occupancy.

Yes, some people may try to find ways to fudge it. But if so only on one parcel.

In pursuit of our goals to preserve the quality of neighborhoods and support local economic development, shouldn't we give owner-occupied parcels precedence?

Per Person Limit

In light of the 2% cap, 5 parcels per individual or business still seems like too many if we are interested in spreading the economic benefits more broadly and maintaining the quality of our neighborhoods.

To level the playing field, could we prioritize the order in which permits are issued in reaching the 2% cap and when on the waiting list?

1. Owner occupied parcels
2. Operator occupied parcel
3. Have one STR permit already.
4. Have two STR permits already.
5. Have three...
6. Have four....

Good Neighbor Guide

Template

Will you be providing a basic template with fill in the blanks to ease this task and to maintain a certain degree of uniformity?

Distribution

Does it go to the property owner, the current resident, or both?

How to locate the correct names and mailing addresses for the neighbors to be noticed?

Will you be providing this?

Will each permit holder have to identify the parcels and the addresses on those parcels then call the tax office to get the mailing address for each of the owners to be noticed? And if it's a rental get the tenant's address from the property owner?

Owners and renters may change during the lifetime of the permit without the permit holder knowing.

How to simplify implementation?

Thanks for your work and your consideration!

Ella Holiday