



@better_LA
betternighborsla.org

October 4, 2023

VIA EMAIL

Humboldt County Planning Commission
825 5th Street,
Eureka, CA 95501
planningclerk@co.humboldt.ca.us

**RE: October 5, 2023 Agenda Item F #1 Short-Term Rental Ordinance Workshop
Public Comment**

Dear Commissioners,

Better Neighbors LA 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”). We believe true home-sharing is the best way to balance the preservation of affordable housing and coastal public access within the Coastal Zone. To that end, Better Neighbors Los Angeles writes to urge the Humboldt County Planning Commission to amend the proposed ordinance to permit only true home-sharing within Humboldt County’s Coastal Zone.

Humboldt County Short-Term Rentals Remove Vital Housing Stock

As California continues to battle a housing affordability crisis, it is imperative housing is protected against conversion to tourist accommodations. According to our data analysis, between 2018 and 2023 the number of unhosted short-term rentals has more than doubled, increasing approximately 122% percent in the coastal communities of Fairhaven, Fields Landing, Fortuna, Indianola, Loleta, Manila, and Shelter Cove.¹ In fact, according to Attachment 2 – Housing STR Data 9.21 included in the agenda materials, short-term rentals comprise 2.90% of the housing stock within Coastal Zone Area Plans.² The majority of these short-term rentals, 225, are unhosted, meaning no host is onsite. Unhosted short-term rentals occupy housing stock that would otherwise be available to long-term tenants or potential homeowners.

¹ Data on file with Better Neighbors LA. Due to data constraints, the raw numbers may be an overestimate. However, data analysis indicates a significant growth since 2018.

² <https://humboldt.legistar.com/View.ashx?M=F&ID=12337767&GUID=23E7108E-D947-4716-99E6-25622110B823>

In the City of Los Angeles, we have seen firsthand how short-term rentals, especially corporate short-term rental operators, have taken housing stock off the long-term market. According to a report authored by Professor David Wachsmuth of McGill University published last year, since 2015 short-term rentals have contributed to an increase in rents by \$810 per year and have taken 2,500 homes off the long-term market.³ In addition, the report found short-term rentals have contributed to 5,000 additional people experiencing homelessness within the City.⁴ While one may argue the vast differences between Humboldt County and the City of Los Angeles, one cannot deny the shared reality of residents across California experiencing rising housing costs. According to the National Low Income Housing Coalition, the monthly rent that would be considered affordable at 30% of the Area Median Income is \$585 in Humboldt County. However, the current fair market rate for two-bedroom housing in Humboldt County is \$1,183.⁵ This illustrates that many renters in Humboldt County are likely using a significant portion of their income to meet high housing costs. As unhosted short-term rentals have continued to occupy housing stock, the supply of housing available to long-term residents has decreased, and may very well be contributing to high housing costs in Humboldt County.

Precedent for Stronger Regulations in Coastal Jurisdictions

In March 2023, the Coastal Commission approved the City of Half Moon Bay's Local Coastal Program Amendment that established balanced short-term rental regulations. Specifically, the regulations included a primary residency requirement for both hosted and unhosted short-term rentals, as well as a 60-night cap on the number of nights an unhosted short-term rental may be rented annually.⁶ This decision has set a foundation for future short-term rental regulations within the Coastal Zone that restrict short-term rentals to a host's primary residence, thus ensuring the primary use of housing remains housing, while short-term renting remains a secondary use.

Conclusion

For these reasons, Better Neighbors urges the Planning Commission to consider revising the proposed ordinance to permit only true home-sharing because it is the best way to balance the preservation of affordable housing and coastal public access within the Coastal Zone. Should you have any questions, please contact Becca Ayala at rebecca@betterneighborsla.org.

Sincerely,

/s/ Randy Renick

³ http://upgo.lab.mcgill.ca/publication/strs-in-los-angeles-2022/Wachsmuth_LA_2022.pdf

⁴ Ibid.

⁵ https://nlihc.org/sites/default/files/oor/California_2023_OOR.pdf

⁶ City of Half Moon Bay LCP Amendment Number LCP-2-HMB-21-0078-2:
<https://www.coastal.ca.gov/meetings/agenda/#/2023/3>

CC:

Humboldt County Board of Supervisors

John Ford

Keenan Hilton