

February 29, 2024

J-1

Rex Bohn, 1st District Supervisor
825 Fifth St., Rm 111
Eureka, CA 95501

RE: Request to Provide an Administrative STR Permit with Exceptions for Existing Permitted Registered Historic Properties

Hi Rex,

Gail and I have been operating an STR on our historic property on Port Kenyon Road in Ferndale since August of 2019. **As you consider the requirements for a new permitting process for STRs in Humboldt County jurisdiction, we ask that Historic Stays be considered as an administrative permit, as an historical exception because we have an existing permitted registered structure.** Historic stays like ours are beneficial to showcase our county as a whole and encourage commerce and tourism. Therefore we ask that you take into account the significant aspects and unique history of our property and others like ours that are on the National and Local Register of Historic Places, that would encourage commerce and tourism in the county.

The city of Eureka is already thinking along these lines and wishes to carve out a special place in their ordinances to include historic homes as STRs. An article on Feb. 14th in the Lost Coast Outpost entitled, "*Old Town Housing Development...*" City of Eureka Development Services Director Cristin Kenyon summed it up by saying, "...[W]e are thinking about doing away with the use permit approval process, potentially limiting how many rentals one entity can have, and potentially creating some sort of easier path for vacation rentals in homes on the Local Register of Historic Places (to incentivize purchase/maintenance of historic homes)."

It is even more important that we carry the torch for all historic properties. In all of Humboldt County, in total only 50 homes and historic structures are on The National and Local Register of Historic Places. Like ours, many of these special estates and buildings have their own unique story to share, which makes them ideal places for visitors to stay and learn about our rich and unique history. And also like ours, they rely on revenue from STRs for the costly repair and maintenance of these beautiful properties.

The unique aspects of the rich history and stunning Victorian architecture of our historic property, nestled on beautiful rural acreage in the Ferndale valley, is truly one of the jewels in Humboldt County. We offer a self-guided walk-around tour on the property of our carriage house and historic home and plan to include more about the original owner who came here in the 1880s and operated a small dairy right on our property. The original barn was falling down but we salvaged as much wood as we could and recreated the original architectural details (shiplap siding, corbels, crown molding, original glass multi-paned windows) into a barn replica motif.

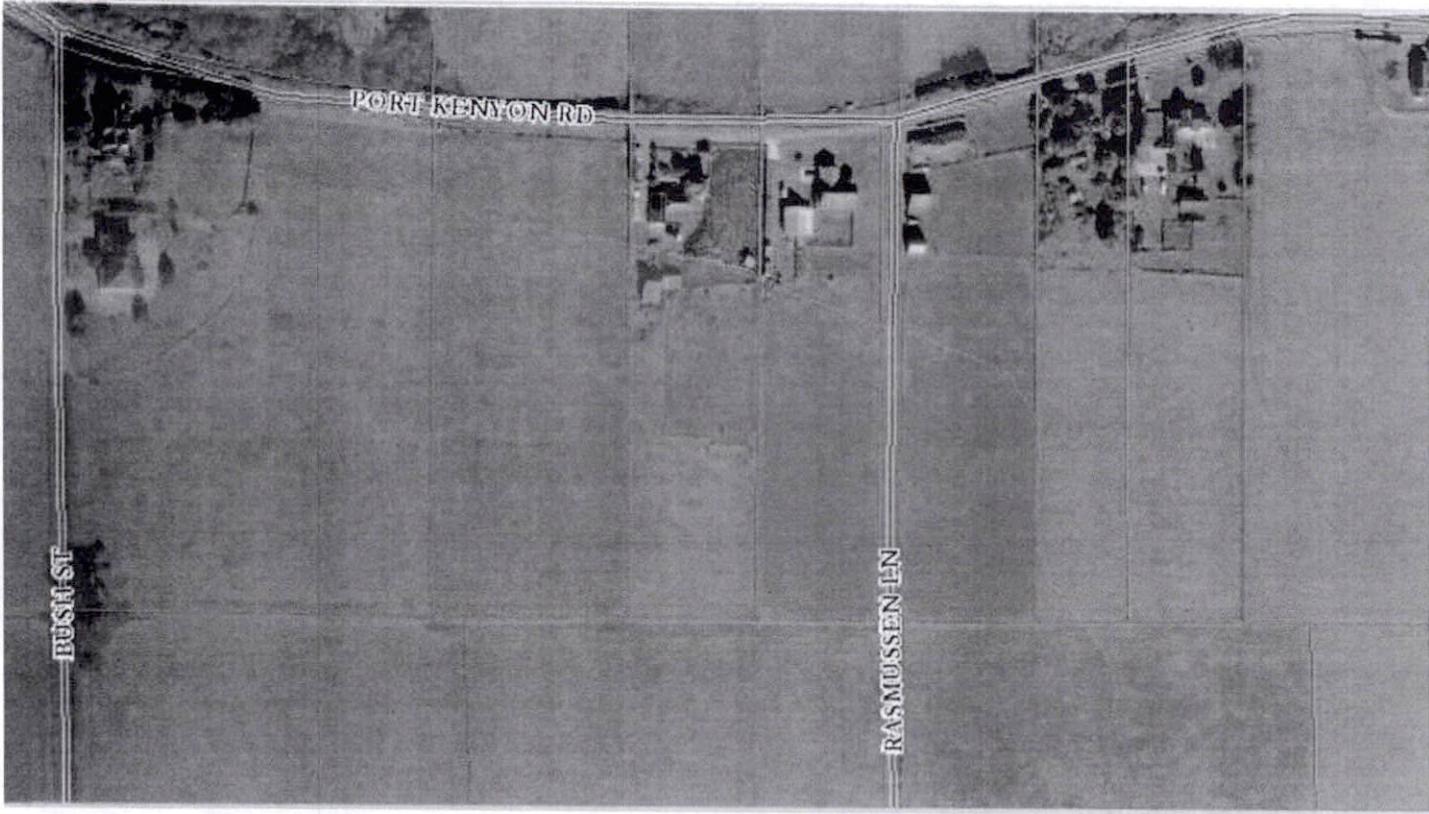
We look forward to continuing to work with the county and are excited that we have the opportunity to share the rich history of our home to local and out-of-town guests.

Sincerely,



Glenn Giaimo
cc: John Ford, Cade McNamara, Ivar Skavdal

P.S. Please note attached copy of our home on the Tsunami Hazard Area. Our Historic Home is *not* in the Tsunami Hazard Area and our Historic Barn is barely in it. In 2/22/99 we received an Elevation Certificate on 2/22/99 allowing us to place our Historic Barn on compacted soil 5-6 feet above its original spot.



- ▶ Humboldt County Parcels (12.1) ...
- ▶ Cannabis Data (2/20/2024) ...
- ▶ CEU Code Enforcement Cases (2/21/2024) ...
- ▶ Planning Permit Data (2/20/2024) ...
- ▶ Building Permit Data (2/20/2024) ...
- ▼ Hazards ...
 - ▶ Coastal and Dam Inundation ...
 - ▼ Tsunami ...
 - ▶ Tsunami Warning Signs ...
 - ▶ Tsunami Evacuation Area (RCTWG 2009) ...
 - ▶ Tsunami Hazard Area (CGS 2021) ...

JH

Damico, Tracy

From: Raelina Krikston <general@rentersunitedhumboldt.com>
Sent: Monday, March 4, 2024 8:56 PM
To: COB
Subject: STR Comment for BOS Meeting (3/5)
Attachments: BOS 3_5 Comment.pdf

Caution: This email was sent from an EXTERNAL source. Please take care when clicking links or opening attachments.

Hello,

Please see the attached PDF with a comment on the proposed STR ordinance that will be discussed at tomorrow's BOS meeting. (Item J).

Thank you and please reach out if you have any further questions or comments.

Sincerely,

Raelina Krikston

BOS Meeting | Short Term Rental Ordinance

Meeting: March 5th, 2024

Agenda Item J1 (Short Term Rental Ordinance)

Hello,

Thank you for taking the time to read this comment. This has been a long process, but it's important to remember that we're still only in the beginning. The real work begins when it is time to permit and inspect the STRs that do come forward to be permitted.

Currently, the **average STR rental earns an annual revenue of \$40.1k**. This would translate to an average monthly income of \$3,341. When we consider the area median income for Eureka \$43,200 per year (US Census), there is absolutely no way that renters can compete with the overwhelming economic incentive STR owners have to convert properties into short term rentals.

As we continue to dissect the issue of STRs in our community, there are a number of factors at play that make this a difficult, sometimes personal, and sorted topic to parse out. On one hand, STRs take away housing that would potentially be sold to first time homebuyers or might be available as a long term rental for local community members. Yes, there are people that make a living off of managing, or owning STRs, some of which do to subsidize their income, or make it their full time job. But regardless, at the core of this issue is one indisputable fact: Short Term Rentals further commodify housing and change the basic use of a property from residential to commercial without any public comment, due process, and in most cases, oversight.

While this ordinance does provide oversight from a county level, STRs do not represent small business owners or entrepreneurs. Operators may be independent, but they are contractors for a multi-billion-dollar global corporation. It is the county's responsibility to protect long term residents, not the speculative investment interests of short term rental owners when it comes to the basic need of housing.

I do appreciate the considerations that have been made due to public comment and participation, however, I would like to remind you that many people impacted by this ordinance are unable to speak to the detriment it will have on their future as renters. With this perspective in mind, the following alternatives from the staff report can make significant positive impacts to the STRO when we see its effects ripple into the community.

Alternatives

1. Applying a fee for Continued Operation of STRs which supports staff cost recovery

I would support adopting this alternative and add additional fees to

- a. **Inspect the property to ensure it is compliant with building code and habitability.** This is to ensure public safety for the continued use of hosted or unhosted rental properties.
- b. **Contribute to a county-wise Housing Trust Fund.** While technically, as noted in the staff's findings, this ordinance does not restrict the housing density from a literal interpretation of the law, this ordinance does limit and restrict local residents from finding long term rentals. Contributing to a county housing trust fund would at least in part, help to remedy the hundreds of homes that will be removed from the long term housing market and support efforts to improve or create new long term housing.

2. Changing the temporary period from 3 months to 60 days or fewer.

I support the adoption of a 90 day temporary period with the stipulation that the overall cap is reduced to 1%.

4. Whether permits should be transferred.

I do not support the alternative to allow permits to be transferred. Allowing the transfer of permits further commodifies STR permits and would promote speculation. This should not be included in the final ordinance. There are other legal measures that can be taken to provide for family after a loved one has passed, such as establishing a trust. STR ordinances should not also be a tool to establish familial dynasties.

5. For Farm Stays, requiring an owner or tenant to be present.

I support this alternate and would include another permitting tier for farm stays that have more than one rental available. Rather than filing two additional permits, STR owners with multiple listings should be subject to a higher permit fee but be exempt from the onus of filing more paperwork.

In addition to the alternatives listed above, please consider amending the proposed ordinance to restrict short-term rentals to no more than 1% of the housing stock within the Coastal Zone with or without Amendment 2. This will help to protect existing housing for long-term use for our community.

Responsibly regulating STRs is a low hanging fruit that can help the county to recapture much needed housing for our current community members, promote true home ownership, and maintain a strong neighborhood character. While this road has been long, it's just the beginning. In many other municipalities, such as Eureka and Arcata,

they are now looking to revise their current ordinances and will be influenced by the course the county's ordinance takes. Although the county's population of renters is equal to 42% of the total population, it is the group that is most vulnerable to changes in housing availability that this ordinance directly impacts.

Thank you,

Raelina Krikston

P.S. Following this letter is a collection of different data points to consider in relation to STRs in our area, and RHNA allocations for the county to add some perspective to the tangible impact STRs make to the overall housing "ecosystem."

RHNA Numbers:

Table 3.13-5: Regional Housing Need Allocation

Jurisdiction	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Proposed Total RHNA Allocation
Arcata	142	95	111	262	610
Blue Lake	7	4	5	7	23
Eureka	231	147	172	402	952
Ferndale	9	5	6	13	33
Fortuna	73	46	51	120	290
Rio Dell	12	8	9	22	51
Trinidad	4	4	3	7	18
Unincorporated Area	351	223	256	583	1,413
RHNA Targets	829	532	613	1,416	3,390

Source: Humboldt County 2019

Source: <https://humboldt.gov.org/DocumentCenter/View/86244/313-Population-and-Housing>

1.2 Short Term Rentals by Jurisdiction as compared to RHNA Allocation

Jurisdiction	Year	Total STRs	STR (Entire Homes %)	STRs (Entire Homes)	Total RHNA Allocation	Percentage of RHNA
Mckinleyville	2023	150	94%	144	UA	13%
Bayside	2023	23	100%	23	UA	13%
Orick	2023	35	77%	27	UA	13%
Loleta	2023	4	29%	1	UA	13%
Arcata	2023	231	93%	215	610	35.25%
Eureka	2023	277	86%	239	952	25.1%
Trinidad	2023	155	96%	149	18	827.78%
Fortuna	2023	36	92%	33	290	11.38%
Ferndale	2023	75	68%	51	33	154.54%
Total				882*	3,390	26.02%

*Incomplete figures, not all Unincorporated Areas (UA) are accounted for

Short Term Rental Data sets from airdna.co

Eureka - Short Term Rental Figures (2023)

Total available listings

277

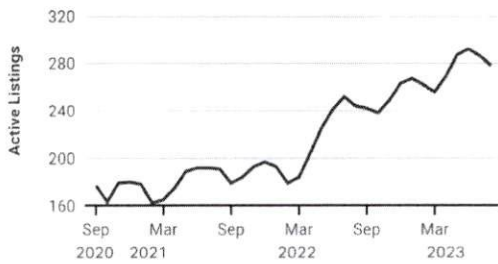
Listings by rental channel



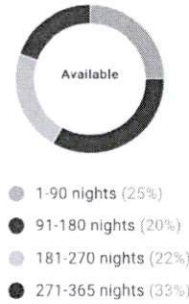
Listings by rental size



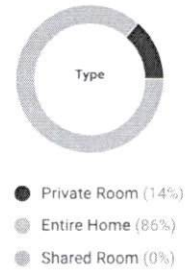
Rental growth in the last 3 years



Listings by annual availability



Listings by rental type



Eureka (2024)

Market Performance Details: Eureka

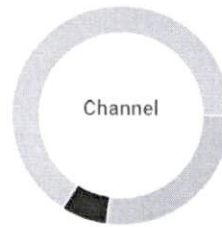
Listings Occupancy Revenue Rates RevPAR

Total Available Listings

285

+4% past year

Listings by Rental Channel



- Airbnb (66%)
- Vrbo (7%)
- Both (27%)

Revenue ⓘ

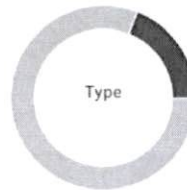
Average Revenue

\$40.1K

per year

+0% past year

Listings by Rental Type



- Private Room (19%)
- Entire Home (81%)
- Shared Room (0%)

Market Overview: Eureka

Save Share

Market Performance 2 Submarkets 403 Active STR Listings 50 For Sale Properties

Review Count ▾



0 Bed 1 Bath 4 Guests

★5 (842)

★ Modern Studio Loft ★ Walk to Old T...
Eureka

Revenue Potential

\$27k
Revenue

Days Available

57%
Occupancy

\$154.4
Daily Rate



1 Bed 1 Bath 2 Guests

★5 (728)

Colorful corner has a private entrance ...
Eureka

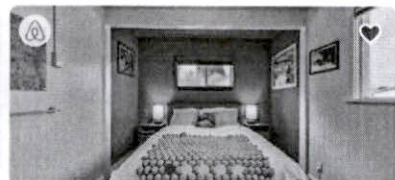
Revenue Potential

\$9.3k
Revenue

Days Available

62%
Occupancy

\$76
Daily Rate



1 Bed 1 Bath 2 Guests

★5 (714)

HIDDEN GEM! Rad Eureka Pit Stop!
Eureka

Revenue Potential

\$11.9k
Revenue

Days Available

64%
Occupancy

\$60.7
Daily Rate

Arcata 2023

Market Performance Details: Arcata



Listings Occupancy Revenue Rates RevPAR

Total available listings

231

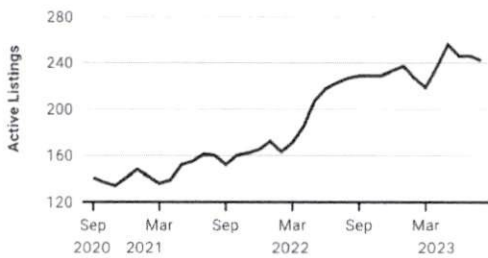
Listings by rental channel



Listings by rental size



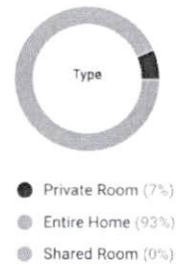
Rental growth in the last 3 years



Listings by annual availability



Listings by rental type



Mckinleyville 2023

Market Performance Details: Mckinleyville

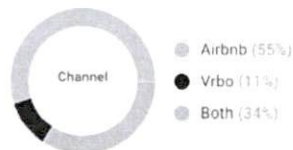


Listings Occupancy Revenue Rates RevPAR

Total available listings

150

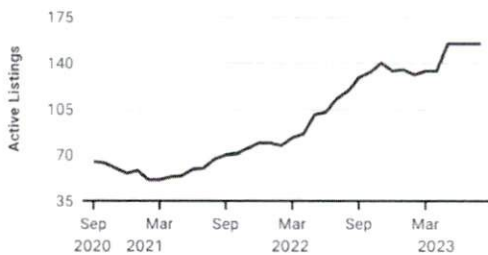
Listings by rental channel



Listings by rental size



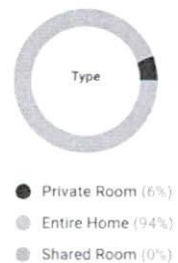
Rental growth in the last 3 years



Listings by annual availability



Listings by rental type



Trinidad 2023

Market Performance Details: Trinidad

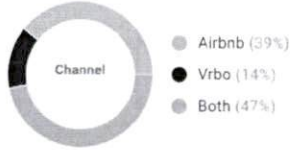


Listings Occupancy Revenue Rates RevPAR

Total available listings

155

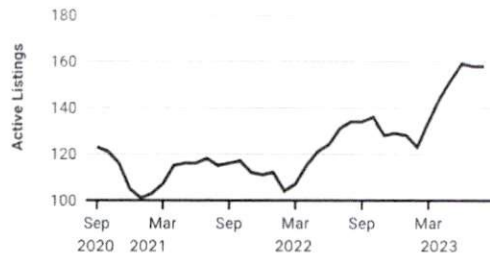
Listings by rental channel



Listings by rental size



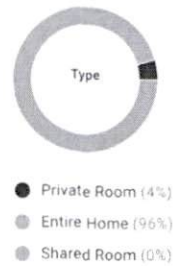
Rental growth in the last 3 years



Listings by annual availability



Listings by rental type



Fortuna 2023

Market Performance Details: Fortuna



Listings Occupancy Revenue Rates RevPAR

Total available listings

36

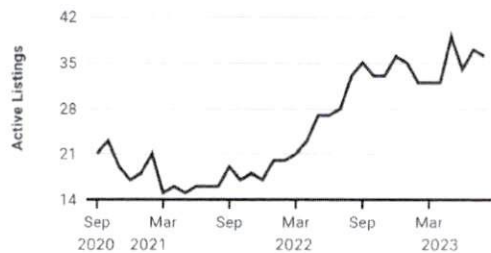
Listings by rental channel



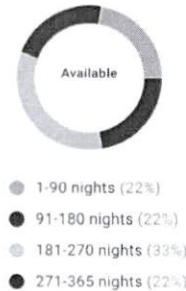
Listings by rental size



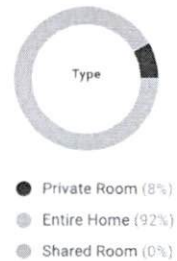
Rental growth in the last 3 years



Listings by annual availability



Listings by rental type



Ferndale 2023

Market Performance Details: Ferndale

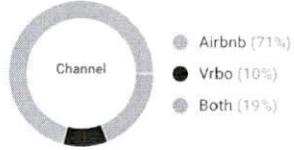


Listings Occupancy Revenue Rates RevPAR

Total available listings

75

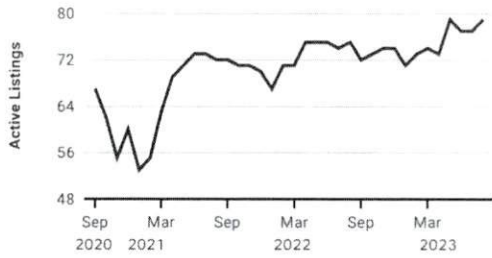
Listings by rental channel



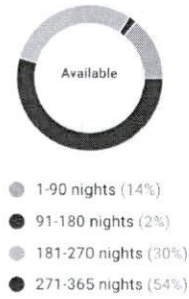
Listings by rental size



Rental growth in the last 3 years



Listings by annual availability



Listings by rental type

