

## McClenagan, Laura

---

**From:** Trinidad Retreats~Vacation Rentals on the Redwood Coast  
<info@trinidadretreats.com>  
**Sent:** Wednesday, September 20, 2023 3:31 PM  
**To:** Planning Clerk  
**Subject:** STR Ordinance Comments

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

Please submit this letter to the planning commissioners and enter this email into the public record for tomorrow night's meeting. Thank you!

Dear Planning Commissioners:

I was part of a group of homeowners and STR managers who petitioned the county board of supervisors over 7 years ago to amend the existing STR ordinance and create a permitting pathway outside of Shelter Cove. The county board of supervisors unanimously agreed at that time that a permitting pathway was needed but never moved forward with it as it took a backseat to cannabis. I was in support then and am in support now of an STR Ordinance revision to create a pathway to permitting outside of Shelter Cove and the "V" combining zone. Unfortunately in the 7 plus years it has taken the county to address STR's the number has risen rapidly, most recently with the collapse of the cannabis industry in Humboldt county as local folks try to figure out how to transition out of one market economy, cannabis into another, tourism.

I appreciate the time and consideration the planning department has spent over the last few months hosting public meetings and making revisions of this ordinance. I appreciate the new addition of accommodations for existing STR's. I understand that ADU's built after Jan. 1, 2020 and AOB's will not qualify as STR's. I support a cap on STR's since trying to gain housing stock is a major goal of the county. However, I still have several concerns.

My biggest concern is that the permitting process still seems overly complicated and labor intensive. The fact that there are 3 different permits (Administrative, special permit and/or conditional use permit) that an applicant may qualify for but none are an "STR permit" just doesn't make sense to me. STR permits are what are issued by most jurisdictions. I feel that the latter 2 permits will likely make up the bulk of existing STR applications making this entire permitting process similar to cannabis in it being time consuming, overly cumbersome and somewhat punitive. I support reducing the # of restrictions required so that most applicants qualify for an Administrative Permit or what I would like to see be re-defined as an "STR permit". This would benefit the county in terms of it being far less labor intensive.

The other main concern I have is a lack of real data. It seems critical to know how many existing units of housing stock will be used to calculate the 2% in the inland area vs. the coastal area? This number has not been clearly stated and must be known in advance of moving forward so that all stakeholders as well as the public knows exactly how many permits may be issued. These permits will be very valuable to homeowners so if the # of housing stock is not precisely known it will be difficult to accurately calculate how many permits may be issued. How will the county manage permits if the # of permit applications exceeds the cap? How will applications be prioritized? Will there be a waiting list based on the date in which an application is received? What if the application was made early but is held up because it requires a special permit or a conditional use permit and scheduling hearings takes a long time due to potentially inadequate staffing? None of these very real potential issues are addressed in the ordinance revisions.

It is my opinion that the following restrictions be eliminated or at least modified:

**Reduce the # of restrictions that require a special permits:**

Eliminate neighborhood concentration and road categories all together as the number of existing STR's that fall into one or both of these categories will likely be a large percentage of applications and will require a **special permit**, making this "overly cumbersome" for the county. These seem like unnecessary restrictions that could create log jams in the permitting process similar to cannabis. The county already identified that the # of special permits required in the "V" combining zone in its workshop staff report was overly cumbersome.

**Neighborhood Concentration:**

I recommend neighborhood concentration be eliminated altogether.

Here is why - This seems overly cumbersome as the county will have to accurately determine how many housing units are on a given access road, the size of the parcels in a given neighborhood and then weed through STR permit applications to see how many apply and qualify for a special permit. Many existing STR's will not qualify for a permit based on the ADU and AOB restrictions. In addition, many existing STR's will not apply for this permit at all for a whole host of reasons which may include because they have illegal, unpermitted dwellings, they don't want the county in and on their property or simply as a result of not wanting to support this regulation process or feel special permit fees are too high. There will almost certainly be a reduction in concentration naturally as this permitting process takes shape. In all of the public meetings we did not hear hardly anyone complain about neighborhood concentration. Most neighbors complain about noise, parking and parties and this ordinance already addresses those issues. This seems like an unnecessary restriction that complicates the permitting process.

If the county does not agree to eliminate neighborhood concentration then I would suggest a modification as follows - Allow these concentration limitations to be reached with attrition overtime. Allow existing # of STR's even if they exceed the concentration and allow this number to be reduced overtime. Do not allow any new STR permits to be issued in a given neighborhood if the concentration exceeds the standard set.

Questions - How will the county determine which of these existing STR's qualify for permits if several apply within a neighborhood and exceed the current concentrations standards set forth? How is a neighborhood defined, where does one begin and end? This seems far too complicated and unnecessary.

**Access:**

Eliminate all road category restrictions. This is overly cumbersome. There is no information on the county website with road categories making this a very difficult restriction to understand where it even applies. The county is responsible for most of the roads where homes/STR's exist so this seems punitive and somewhat discriminatory to homeowners. The restriction to category 3 roads for homeshares in both the inland and coastal areas as well as STR's in the inland area but category 4 roads for the coastal areas seem to be an unnecessary and very arbitrary restriction. In this very rural county with a wide variety of roads this seems unfair and punitive for homeowners wishing to qualify for a permit. If homeowners and long term tenants can reside on a road in the county then I don't understand why STR's and even homeshares would be restricted to certain road categories. None of this is commercial use of a road. It is for residential use. An STR may be occupied by a homeowner part of the year, occupied by a long term, month to month tenant part of the year and an STR part of the year. In all cases they are occupying the home as a residence and their use of the road with regard to safety and impact should be the same or very similar. There is no evidence that there is more impact on a road by tourists vs. residents. If road impact is the reasoning behind this restriction then occupancy limits and a reduction in the definition of a gathering could be considered as an alternative. If safety is an issue it seems the county would value owner's safety equally with long term and short term tenancies.

It is my sincere hope that the planning commission will give these suggestions consideration in the spirit of creating a more simplified, easy to implement and enforce ordinance. I would also suggest that once STR's are permitted that they get mapped so that concentration in areas of the county can be studied over time.

Sincerely,

Jonna Kitchen



Reply Reply all Forward

