



HUMBOLDT

ASSOCIATION OF REALTORS, INC.

September 21st, 2023

HC Planning & Building Department
ATTN: Keenan Hilton
3015 H Street
Eureka, CA 95501

RE: The Humboldt Association of Realtors® offers points of consideration for Humboldt County's Draft Short Term Rental Ordinance and Draft Suspension and Revocation Procedures.

Dear Humboldt County Planning & Building,

The Humboldt Association of Realtors® (HAR) acknowledges and appreciates the unique situation the County of Humboldt currently finds itself in regarding short-term vacation rentals (STRs) and the associated concerns surrounding the topic. We are confident the Humboldt County Planning & Building Department can create an ordinance that will transition our community into this new administrative STR process efficiently and effectively for everyone's best benefit.

The Humboldt Association of Realtors®, our Government Relations Committee, and our Short-Term Rental Subcommittee were honored to be selected as one of the first stakeholders addressed by the county pertaining to this ordinance. HAR places extreme value on our collaborative working relationship with Humboldt County officials and is excited to continue providing input during the creation and maturing of this ordinance and we hope our input is considered.

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Some of the positive and supportive takeaways from the most recent ordinance include:

- The open and responsive approach the Humboldt County Building and Planning Department has taken during the development of this ordinance should be the method of development moving forward for all County Ordinances. The changes happening in real time from meeting to meeting were a great comfort and really is evidence that what people were saying is being heard, considered, and put to action.
- The updated process to permit Alternative Owner Builder and Accessory Dwelling Unit structures as short-term rental units is a much needed and crucial piece to the success of the STR Ordinance. Because so many STR properties throughout the County do fall into these dwelling types, it is imperative that the required permitting load on owners be as minimal as possible.
- The updated and proposed plan to transition existing operational STRs to permitted STRs after two months, pending the 2% cap, is an intelligent and creative method to allow those currently operating to remain operating and become “legal”. Consideration should be given however, to additional explanation of requirements in the event the property should need a special permit.

Our main outstanding concerns and recommendations regarding this ordinance are as follows:

- The complaint process should have amplifying procedures and/or language to outline more clearly what a complaint is and a process to solution. The public currently sees the complaint process as the means to the end of operations. The STR ordinance should address this fear by outlining more clearly what operators and complaint providers can expect. The revision should include a procedure for complaint investigation and mitigation that is comprehensive and considers all parties involved equally.
- The County should work with stakeholders to develop a “Good Neighbor Guide” that meets the County’s standards and expectations. Leaving this responsibility to the permit applicants creates space for ambiguity and vagueness in guidance. This would also be a perfect document to outline the complaint process!
- STR concentration is a primary concern as it has the potential to have the largest impact on the fabric of neighborhoods and communities. With that being said, the current proposed concentration density of 10% is not an acceptable “one size fits all” solution to the existing STR operations around the County. It is recommended a County-wide STR density survey is conducted prior to adoption of this Ordinance. It is also recommended the delineation of STR concentration numbers should be allotted by Community Planning Areas. This would more appropriately account for and align with areas of high STR density outside city limits.

Thank you for taking the time to listen and read through this letter. We look forward to ongoing discussion and information from all offices of Humboldt County regarding the sensitive issue. Our recommendation is to delay adoption of the Short-Term Rental ordinance until full clarity in the

ordinance can be achieved and measures can be taken to protect community members and their rights as property owners.

Respectfully,



Bernie Garrigan
Short Term Rental Sub Committee Chair
Government Relations Committee
The Humboldt Association of Realtors