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Subject: Public comment on Draft Short Term Rental Ordinance
Date: Thursday, October 26, 2023 8:59:15 AM

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Dear Planning Commissioners,
Thank you for the opportunity to comment on this draft ordinance.

I'm writing on behalf of the Northcoast Environmental Center which was founded in 1971 with the mission to promote understanding of the relations between people and the biosphere and to conserve, protect, and celebrate terrestrial, aquatic, and marine ecosystems of northern California and southern Oregon.

Thank you for your efforts to craft this ordinance and regulate short term rentals. One of the stated purposes of this ordinance is to protect housing stock, which we support. Retaining existing housing stock will not only help address the housing affordability crisis in the county, but to some extent can also help prevent sprawl and the destruction of forests and agricultural lands for new housing development.

To fulfill the stated purpose of protecting housing stock, we suggest that you lower the cap on rentals and the number of rentals allowed per owner. To this end, we also support section 60.05.10.2.2 which states that "Short-term Rental Permits shall not be transferred between property owners." Not allowing permits to be transferred will help maintain housing stock and prevent properties from being sold at inflated prices because they are seen as money-making businesses rather than as homes. If new owners want to use the property as a vacation rental, they can go through the permit process.

There is a trend in short-term rentals to have outdoor lighting that stays on all night long, which is a disturbance to neighbors, renters, and wildlife. We suggest strengthening the lighting regulations to meet Dark Skies standards, specifically by stating that lighting should be on-demand and shielded downward.

We'd also like to note that the noise regulations and prohibitions on parties seem difficult to enforce. We suggest that the Good Neighbor Guide also include information for what recourse neighbors have if those regulations are not followed or enforced, for example who to complain to and how complaints should be documented. This way, STR operators will also know what is at stake if their customers don't follow the rules. We support the move to change quiet hours from 10pm to 6am to 10pm to 8am.

Finally, it appears from the draft ordinance that STRs would not be subject to the Transient

Occupancy Tax. Non-owner occupied units are commercial enterprises and should be taxed similar to hotels or bed and breakfasts.

Thank you for your consideration.

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Caroline Griffith (she/they)

Executive Director and EcoNews Editor

The Northcoast Environmental Center sits in Goudi'ni, part of the unceded ancestral land of the Wiyot peoples. We strive to follow the example of the Indigenous peoples of the north coast who continue to steward this land as they have done since time immemorial. We pledge to listen to, learn from, respect, and include the voices of Indigenous peoples in our work advocating for the wellbeing of this land and the people who call it home. Join us in acknowledging and respecting the sovereignty of the Wiyot Tribe by participating in the [Wiyot Honor Tax](#), or supporting the tribe upon whose land you reside.

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