

Hello,

Please see my comments on the current STR Ordinance.

The current ordinance states:

*"61.05.10.2.3 Per Person Limit. An individual or business shall not own more than five (5) parcels with Short-term Rental permits."*

I support an ordinance that only allows for "Home-share" STR and would eliminate 61.05.10 Short-term Rentals defined as entire homes without a caretaker or resident. This would open hundreds if not thousands of homes up to first time home buyers and long-term renters in our community who currently need homes or are seeking upward home mobility.

When compared to RHNA allocations alone, the number of STR in the county represent a significant portion of our current housing stock that is being lost to commercial ventures.

Based on the current RHNA allocations, **3,390 new** homes are needed. The current number of STRs in the county are equivalent to **26%** of our RHNA needs. (See table 1.2)

The vast majority of STRs are entire homes, an average of 81% (based on data in table 1.2 below) many of these homes would fall in the moderate to above moderate income RHNA category. This is significant because 60% of our RHNA allocations are designated to these two income categories. When moderate and above moderate housing is in short supply, it places more significant downward pressure on low income and very low income households. If more people with means are taking up space in lower income homes, due to a lack of available housing this creates even more competition for an already scarce resource in lower income housing stock. Coupled with the attrition of STRs in our community, we cannot simply build more housing without addressing the evaporation of housing stock from STR conversions. STR regulation is necessary to ensure the health of our communities and neighborhoods.

Please consider supporting a measure that would eliminate Short-term Rentals defined as entire homes without a caretaker or resident and place homes back into our housing stock for the people who live here now.

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
<b>RHNA Targets</b>	<b>829</b>	<b>532</b>	<b>613</b>	<b>1,416</b>	<b>3,390</b>

Source: Humboldt County 2019

Source: <https://humboldt.gov/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%
<b>Total</b>				<b>882*</b>	<b>3,390</b>	<b>26.02%</b>

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

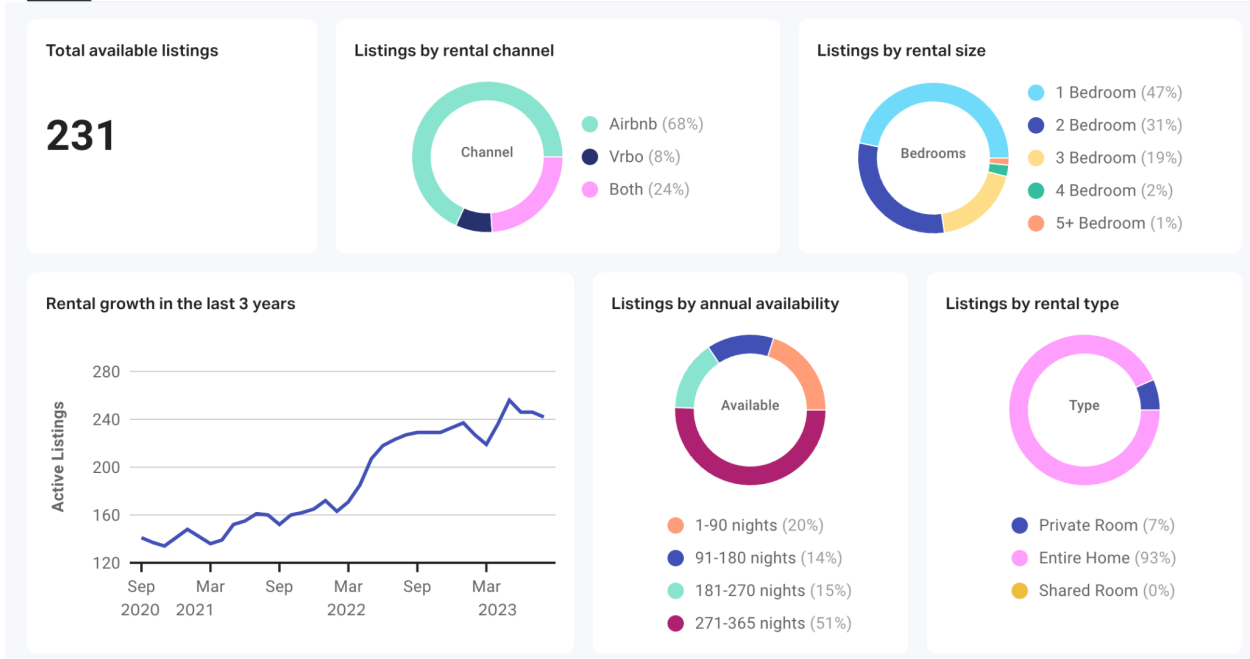
# Data sets from airdna.co

## Arcata

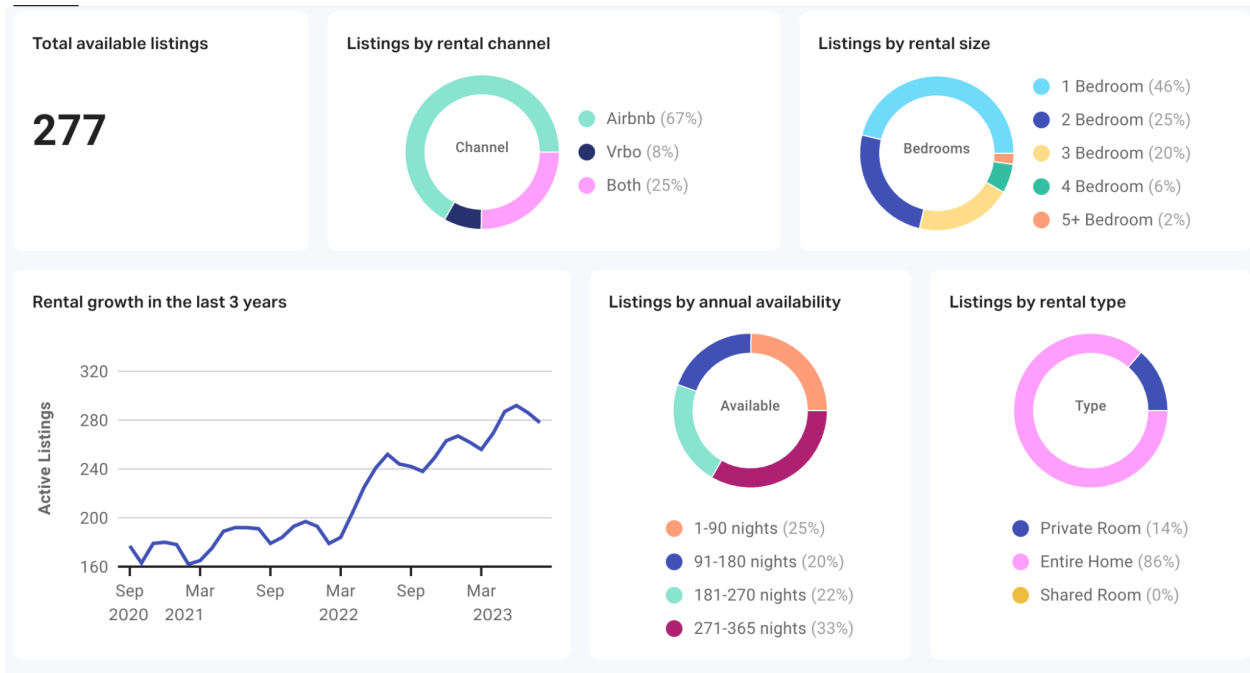
### Market Performance Details: Arcata



Listings Occupancy Revenue Rates RevPAR



## Eureka - Short Term Rental Figures



# Mckinleyville

## Market Performance Details: Mckinleyville

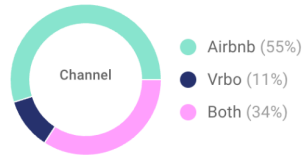


Listings Occupancy Revenue Rates RevPAR

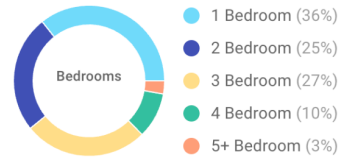
### Total available listings

150

### Listings by rental channel



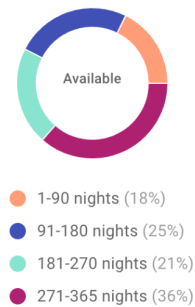
### Listings by rental size



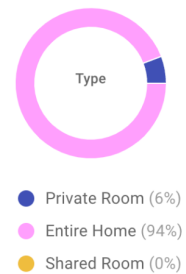
### Rental growth in the last 3 years



### Listings by annual availability



### Listings by rental type



# Trinidad

## Market Performance Details: Trinidad

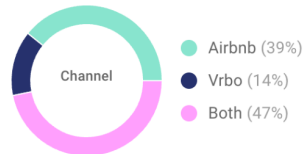


Listings Occupancy Revenue Rates RevPAR

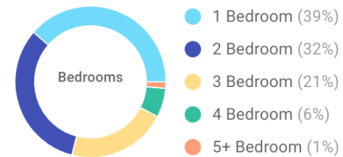
### Total available listings

155

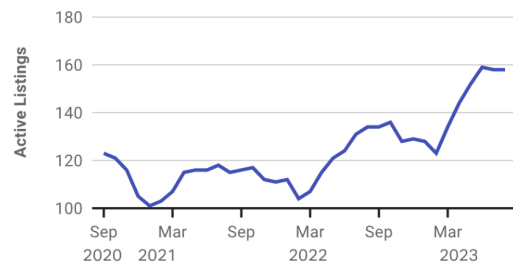
### Listings by rental channel



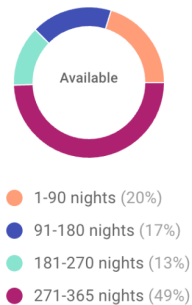
### Listings by rental size



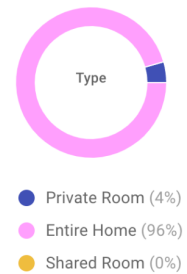
### Rental growth in the last 3 years



### Listings by annual availability



### Listings by rental type



# Fortuna

## Market Performance Details: Fortuna

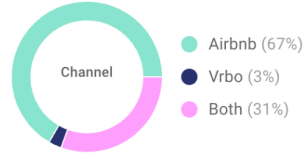


Listings Occupancy Revenue Rates RevPAR

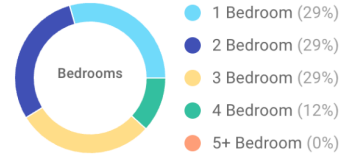
### Total available listings

36

### Listings by rental channel



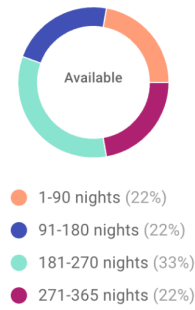
### Listings by rental size



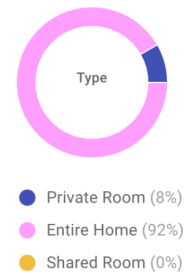
### Rental growth in the last 3 years



### Listings by annual availability



### Listings by rental type



# Ferndale

## Market Performance Details: Ferndale

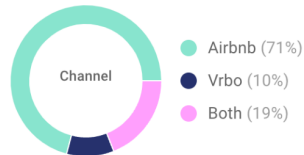


Listings Occupancy Revenue Rates RevPAR

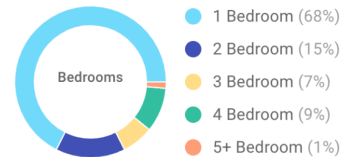
### Total available listings

75

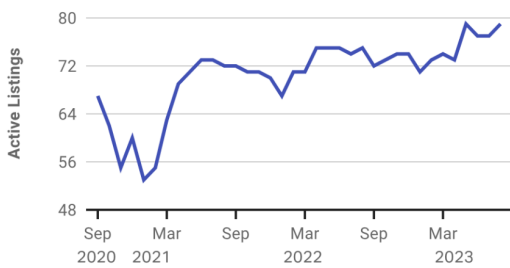
### Listings by rental channel



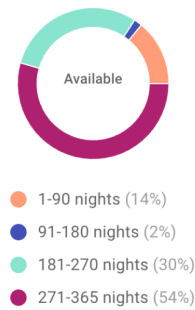
### Listings by rental size



### Rental growth in the last 3 years



### Listings by annual availability



### Listings by rental type

