

From: [Mark Watson](#)
To: [Gary Helfrich](#)
Cc: [PlanningAgency](#)
Subject: Re: Comments on Vacation Rental ordinance for November 18 Planning Commission
Date: November 18, 2021 1:11:19 PM

EXTERNAL

Hi Gary,

I submitted the comment below, but it does not appear in the Public Comments folder for today's meeting.

...Mak

On Nov 17, 2021, at 8:51 AM, Mark Watson <markwatson@cantab.net> wrote:

Vacation rental license renewal Properties are often booked a year in advance, especially for Thanksgiving and the winter holidays. Owners should not face the prospect of having to cancel bookings due to license non-renewal. Licenses could be for 2 years, with the possibility to extend each year, so that they can always maintain at least a year of certainty.

Three strikes It is possible that an owner / property manager who "does everything right" may nevertheless have the bad luck (or a neighbor prone to unreasonable complaints) to have three violations in a year. The process for determining violations and non-renewals must include sufficient discretion and right-of-appeal to deal with this.

Proximity limits These are a blunt instrument with considerable collateral damage. For those who do not rent their homes now, the possibility to do so is a valuable asset. Proximity limits take that asset from all neighbors of a vacation rental irrespective of whether there is a proliferation of rentals in that area. Proximity limits also favor those with large lots who are less likely to be caught by the limit.

Policy analysis The policy analysis so far seems limited to a review of what policies have been imposed elsewhere. This is interesting but insufficient to justify the policies in Sonoma. Before imposing policies with significant cost to Sonoma homeowners, the Planning Agency and Commission should ensure that the problems addressed by each policy and the costs and benefits of the policy are well understood. This may be straightforward for the upgrade of the performance standards where there is experience of those policies in Sonoma to draw on and where the policies are not overly burdensome. Restrictions on proximity, density or rental days, however, impose costs on a completely different scale. These require careful analysis of exactly where they are needed, what problem they will solve and what is the minimum intervention that can achieve that goal. This analysis is absent at present.

Best regards,

Mark Watson
(Personal capacity, not for TSRHC)

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