

## **To the members and staff of the Sonoma County Planning Commission**

The Sea Ranch Hosting Coalition is a group of over 230 Sea Ranch owners (and some frequent renters) who support reasonable regulation of short-term rentals in the coastal zone but oppose the kinds of restrictions called out in the Sea Ranch Association's Model Rule 6.7. The coalition also includes a number of owners who do not currently rent their homes but are concerned that they may lose the ability to do so in the future. It exists as a direct result of the adoption of the Model Rule by the Sea Ranch Board on May 22. The Rule was submitted to Sonoma County as input for your consideration as you move towards developing performance standards for short term rentals.

We believe that short term rentals in the coastal zone provide affordable public access, particularly at Sea Ranch which is a mixed second home, short term rental and residential community. The Sea Ranch Board does not appear to be planning to reduce the availability of short-term rentals on the development below historical levels.

Since the Association Board is now on public record as committing not to pursue regulatory approval to implement Model Rule 6.7 on the Sea Ranch, we do not need to take up more of your time now on short term rentals. We anticipate that when the County proceeds to develop ordinances to implement performance standards for short term rentals in the coastal zone we will have the opportunity to provide input and comments.

We do have some concerns about the Association's input to your commission for the October 7 meeting. While we support the Association's position on ESHAs we are concerned about its suggestion to add the words "community character" to the reasons for STR land use policies. Without qualification, "community character" can be a highly charged term with a very subjective interpretation. It has been used elsewhere in the past as a Trojan horse for implementing discriminatory housing policies. We believe that the County should limit any short term rental restrictions to the environmental reasons already proposed.

The Hosting Coalition shares the general concern about the absence of adequate employee and affordable housing on the coast. We stand ready to

work on solutions to this intractable problem. However, the Sea Ranch Association's desire to add "housing" as a reason for STR land use policies on the ranch ignores the fact that there is no set of circumstances where a reduction in short term rentals would result in greater, or indeed any, availability of affordable housing. With the median Sea Ranch real estate prices well in excess of \$1 million, this is economically unrealistic. Solutions to the housing challenge will need to be developed outside the Sea Ranch.

Please accept this document as input for your consideration at your October 7 Planning Commission meeting. We look forward to working with you and your staff as this process moves forward.

Our website at [www.TheSeaRanchHostingCoalition.org](http://www.TheSeaRanchHostingCoalition.org) offers more information about our positions and membership.