

Chelsea Holup

From: Carmen Estrada <socovro@gmail.com>
Sent: January 31, 2022 10:17 AM
To: PlanningAgency; BOS; PRMD-LCP-Update
Cc: Gary Helfrich
Subject: Public Comments - February 3.2022 - LCP Planning Commission
Attachments: 2022.1.31.PlanningCommissionComments.pdf

EXTERNAL

Hello Commissioners & Supervisors:

Please distribute the attached comments relating to the LCP Update scheduled for this Thursday's Planning Commission meeting.

We support the PRMD staff's LCP recommendations presented at the last Commission meeting relating to the coastal zone vacation rental (VR) homes. We strongly support coastal access and believe that creating performance and property management standards, along with requiring a VR license as PRMD staff recommends will ensure responsible VR operations in the coastal zone.

The Sonoma County coastal zone is rugged, beautiful, rural and sparsely populated. Vacation rental homes have existed on the coast for decades. It is also a tourist center with millions visiting each year. It does not meet the California Coastal Commission's standards for creating vacation rental limits.

Thank you for the opportunity to comment.

Sonoma Coast VR Owners

Sonoma County Coalition of Hosts

- We are groups of county and coastal zone vacation rental owners and supporters -

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

To: Planning Commission, Board of Supervisors

**From: Sonoma Coast Vacation Rental Owners
Sonoma County Coalition of Hosts**

**Re: Sonoma County Local Coastal Plan Update –
Vacation Rentals Should Not be Limited in the Sonoma County Coastal Zone**

The January 13th Local Coastal Plan (LCP) workshop covered the Land Use Element, which included “Vacation Rentals” (VR) in the coastal zone. Planning department staff (Gary Helfrich) made a presentation that summarized the staff’s LCP VR recommendation as:

- The Vacation Rental Ordinance for the coast should require performance standards, a VR license, and property management.
- The LCP should contain “no land use limits on the coast” that would limit VR operation. This recommendation is because of the rural nature of the Sonoma Coast and the California Coastal Commission’s (CCC) support of low-cost affordable housing that makes the coast accessible to the public. This is a clear mandate in the Coastal Act.

We support the county planning staff’s recommendations regarding Sonoma County coastal zone vacation rental home regulation. Land use limits on vacation rental housing in our largely unpopulated coastal area make no sense considering the rural, undeveloped nature of our coastal zone and the lack of affordable housing and limited hotel lodging. Vacation rental and second homes have been on the Sonoma coast and in the Russian River area for decades. Census data shows that full-time residents on our coast are a minority of the home occupants.

I. THE SONOMA COAST IS UNIQUE AND UNLIKE OTHER COASTAL LCPs

VR limits in other coastal areas mentioned in the January public comments (Solano, Trinidad, Santa Cruz, Imperial) where VR limits have been allowed do not compare to the Sonoma Coast. The policy reasons behind the creation of VR limits should be explored.

- For example, these other areas may be denser with more people per square mile. The Sonoma coastal zone is essentially rural with less than 4000 people in the 55-mile-long coastal area.
- The homes in other coastal areas may be more affordable because they have smaller condos, townhomes or units in large multiple housing units available for sale or rent. None of that exists on the Sonoma coast where nearly all of the homes are single family dwelling homes. Very few smaller units are available.
- Or the areas where VR limits have been allowed have a significant number of working people, families with children, and students who can buy or rent the available housing. In contrast, the Sonoma coast has very few long-term rentals (5-8% of housing), no colleges or students, and is not affordable.

Comments on the Sonoma County Planning Commission – Sonoma County Local Coastal Plan Update Workshop of 1/13/2022

- The Sonoma coast residents are older (average age 65), well educated, wealthier, and have very few children. This is not the demography of California, Sonoma County, or other coastal regions where VR limits have been imposed.
- Other coastal areas allowing VR limits have many more rentals with multi-units and condos available at the entry level to buy or rent. The Sonoma coast has almost none of these housing options.

VR limits approved by the CCC have been limited to areas, as county planning staff pointed out, that are densely populated, have many hotels available, or where the VRs are expensive and do not meet the “affordable” standard required by the CCC.

II. THE SONOMA COUNTY COASTAL ZONE HAS HISTORICALLY HAD VACATION RENTALS – EVEN BEFORE THE COASTAL ACT WAS IN EFFECT

It was commented at the last Planning Commission LCP Workshop that the Coastal Act was developed before the explosive growth of VRs. This is not true for the coastal zone region, or the Russian River area which have historically been tourist areas with very few permanent residents and many VR and second home owners.

The Sonoma County coastal zone has a permanent population estimated at 3500-3800 residents. This is less than 1 percent of the total county population of 485,722. The majority of homes (over 70%) in the coastal zone are in two planned communities: Bodega Harbour (BHHA) and The Sea Ranch (TSRA). The homes in these areas are expensive, selling for well over \$1million. These are not affordable homes and there are very few long-term renters who can afford to rent a home on the coast for \$5,000 per month. There are few nearby jobs, and commutes to nearby Petaluma or Santa Rosa are over an hour roundtrip.

U.S. Census data tells us that:

- In 2000 Bodega Bay had 1,505 housing units, of which 838 were occupied, and **667** or 44% were “vacant” (of which **603** were used for “seasonal or recreational use.”)
- In 2010 Bodega Bay had 1,449 housing units, of which 708 were occupied, and **741** or 51% were “vacant” (of which **615** were used for “seasonal or recreational use.”)

Similar Census figures are available for The Sea Ranch subdivision which has approximately 1800 units. If you include homes outside of TSRA planned community the area has a total of 1908 housing units.

- In 2010 TSR area had 1908 housing units - **62%** were unoccupied or “vacant.”
- In 2018 TSR area had **69%** “vacant” housing units.

In 2007 the Bodega Harbour Homeowners Association Board did an extensive survey of owners in a “Rental Task Force” report. At that time, *over 15 years ago*, the report concluded that only 25% of homes were occupied by full time residents. The remaining homes were “vacant” and owned by second home or VR owners.

Submitted by via email transmission – January 31, 2022

Sonoma.CoastVRowners.org
SonomaCountyCoalitionofHosts.com

For decades the coastal zone housing units have had significant numbers of owners who used the homes as VRs, or second homes, and not as primary residences. Many of these homes have been vacation rentals since before the 1970s.

III. HOUSING & HOUSEHOLD DIFFERENCES

The following table shows the number of housing units on the Sonoma coast, compared to other LCP coastal areas where VR homes have been regulated and capped or had other limits on the VR owners. Each geographical area has its own story but a comparison shows that the Sonoma coast housing has a smaller resident population, significantly fewer owner-occupied and renter-occupied homes, fewer households with children, and significantly more “vacant units” most of which are vacant due to seasonal, recreational or occasional use according to Census statistics.

This stark difference is because the north central coast of California – the Sonoma coast – has historically been the location of second-homes or short-term rental homes with few full-time residents; those owners who have decided to live in this coastal area have been older, retired and without children.

TABLE: LCP AREA HOUSING UNITS, OCCUPIED, RENTED, VACANT, HOUSEHOLDS WITH KIDS

LOCATION	HOUSING UNITS	# Occupied	# Owner Occupied	#Renter Occupied (Long-Term)	VACANT UNITS	Vacant due to seasonal, recreational or occasional use (out of total vacancies)	Vacant due to “for rent”	# Households with Kids
Bodega Bay* 94923 Area	1,449	707 49%	492 34%	215 15%	741 51%	615 83%	60 8%	90 13%
Sea Ranch 95497 Area	1,818	689 38%	591 33%	98 5%	1129 62%	998 88%	72 6%	58 8%
Encinitas 92024	20,991	19,829 94%	12,571 60%	7,078 34%	1,342 6%	555 41%	411 31%	5,885 30%
Imperial Beach 91932	9,883	9,113 92%	2,576 28%	6,357 64%	770 8%	216 28%	390 50%	3,614 40%
Pismo Beach 93449	5,587	3,835 69%	2,337 42%	1,498 27%	1,752 31%	1443 82%	164 9%	620 16%
Laguna Beach 92651	13,462	11,254 86%	6,874 58%	4,380 33%	2,208 16%	1,361 62%	402 18%	2,318 21%

- Includes Carmet & Salmon Creek
Demographic data by zip code, Census and other sources gathered by unitedstateszipcodes.org (numbers rounded)

A comparison of the Sonoma coast with the Trinidad, CA LCP is not made here because of the small size of Trinidad. It is a coastal location of affordable homes in a total area of less than one square mile and a population of 345 on 204 lots. It is unlike the Sonoma coast in numerous ways and a comparison is nearly impossible to make.

IV. SONOMA COAST VRs SUPPLEMENT MOTEL/HOTEL ROOMS TO MAKE THE COAST ACCESSIBLE TO THE PUBLIC

Public accessibility is crucial to the Coastal Act and is one of the Coastal Commission's goals. It is agreed that millions of people visit the Sonoma Coast each year. The coastal zone has a mere 384 Hotel/Motel Rooms available to the public. There are also 556 campground spaces available. (See Sonoma County Local Coastal Plan, Tables C-LU-1 and 2) This meager number of hotel accommodations may be due to the rural nature of the area, or the successful development controls on the coast.

Home owners who open their coastal zone homes for short-term rental occupancy are providing much needed public access to the coast. Limiting VRs in the coastal zone would greatly impact the short-term rental availability and coastal access for the public.

CONCLUSION

Sonoma Coastal VR owners do not support land use limits for VRs in the LCP. The information detailed above show why land use limits for VRs on the North Central Coast Region are inappropriate. In contrast, performance standards are something coastal VR owners are used to because 70% of the Sonoma coastal zone homes are in "planned communities" with homeowners' association rules and fines. Similarly, the county planning staff's proposed VR License and property manager requirement can be a useful evolution encouraging responsible VR home operation that will benefit coastal residents while allowing the public coastal access.

The Sonoma coast should be open to the public and not a private enclave for the few.

Thank you for your consideration of these views.

cc: Gary Helfrich, Sonoma County Planner/PRMD