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Subject: Local Coast Plan - Land Use Element - Comments for 2/3/22 Planning Commission

EXTERNAL

**SONOMA COUNTY PLANNING COMMISSION 2/3/22
LOCAL COASTAL PLAN
LAND USE ELEMENT
PROGRAM C-LU-1: Vacation Rentals**

Comments from The Sea Ranch Hosting Coalition

We are a group of now over 300 Sea Ranch home owners, most of whom rent our homes short-term. We invite the Planning Commission to re-visit our [previous detailed comments](#) [1]. The relevance of these was questioned at the time since land use restrictions on vacation rentals in the coastal zone were proposed only by the Board of The Sea Ranch Association and not by the County. Since such restrictions are now proposed by Commissioners and under investigation by staff we believe our original comments have renewed relevance and we respectfully resubmit them for your consideration.

We ask particularly that the Planning Commission base its policy-making on clear evidence and proper study. We note that the character of The Sea Ranch neighborhood in our County is one of around 40% residents, 40% vacant second homes and 20% vacation rentals [2]. It has long been a popular vacation destination and the share of homes used as vacation rentals has remained steady for decades [3]. Indeed there is evidence [4] that the number was considerably higher in the 2000s.

The Coastal Commission states that restrictions on vacation rentals in the coastal zone are appropriate only in cases of further proliferation in areas where there is already ample supply [5]. We understand from our discussions with Coastal Commission staff that this is still the case. There is no evidence of such proliferation at The Sea Ranch. Indeed, The Sea Ranch Association's Short Term Rental Task Force, citing lack of evidence, concluded that *"It is unclear if these more restrictive density policies will be necessary"*, did not include such policies in its recommendations and suggested the performance standards it proposed would be sufficient to address any problems [3].

At the Planning Commission meeting of 1/13/22, reference was made to the cost of short term rental housing in the Coastal Zone. The Planning Commission should not make policy based on anecdotal reports. An *ad hoc* search on AirBnB will show you only the nights that have *not* sold. In the near term, the bargains have all been snapped up and further out dynamic pricing has not yet kicked in. Many commercial services exist which can provide data on actual rental prices. If this information is relevant to your thinking the Commission should obtain reliable data.

We understand that in some parts of the Country there is pressure from short-term rentals in neighborhoods that would otherwise be mostly occupied by full-time residents. This is not the case at The Sea Ranch, nor, as we understand it, elsewhere in the Coastal Zone. Owning a vacation rental in the Coastal Zone is not a profit-making activity, as any owner will easily attest. There is little to fear from investment driven acquisition and no evidence this is occurring. Short term rental owners are typically families who have bought or inherited a cherished family home which they would be forced to sell were they unable to rent. [6]

We also understand that there may be increased utilization of the existing properties, perhaps driven by increased use of dynamic pricing. This represents a welcome increase in public access and its affordability and does not affect the density of full-time residents that is often cited as the major neighborhood impact of short-term rentals.

Before entertaining policies that would be extremely costly to homeowners and harmful to public access, the Sonoma Planning Commission should obtain reliable evidence of the problems of proliferation required by the Coastal Commission to justify vacation rental restrictions. Further, the Planning Agency should study both the costs and benefits of such policies to ensure appropriate balance. Since both are absent, we suggest that the scope of Program C-LU-1 in the Land Use Element of the Local Coastal Plan should remain unchanged at this time.

Mark Watson, Donna Martinez, Klaus Heinemann, Chris Kenber, James Curley, Chad DeWitt, David Workman
For The Sea Ranch Hosting Coalition
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[1]

<https://drive.google.com/file/d/1DObNwPRDj9DkyNmUqnRWjHbrJZ7jnGVE/view?usp=sharing>

[2] See [1] for sources. These are pre-pandemic figures as we do not think pandemic era data is a suitable basis for long-term policy-making.

[3] See The Sea Ranch Association Short Term Rental Task Force Report (<https://www.tsra.org/wp-content/uploads/2020/12/2020-12-12-TSRA-BOD-Reg-AgendaPkt-0a2-Full-r.pdf>, page 7d1).

[4] https://www.tsra.org/wp-content/uploads/2019/11/2002_072_Soundings_Spring-ID_0760.pdf, "2000 Census Describes Sea Ranchers", "Houses", p8

[5]

https://documents.coastal.ca.gov/assets/la/Short_Term_Vacation_Rental_to_Coastal_Planning_&_Devt_Directors_120616.pdf

[6] See multiple testimonials on our website, www.thesearanchhostingcoalition.org

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