



March 17, 2022

Planning Commission  
Sonoma County Planning Division  
2550 Ventura Ave  
Santa Rosa, CA 95403

Dear Members of the Planning Commission,

On behalf of Airbnb, thank you for the opportunity to comment on the proposed Vacation Rental (VR) Ordinance. We are committed to working with local governments to develop fair, reasonable regulations that balance the concerns of residents, while preserving the many economic benefits of VRs for Hosts and their communities. We appreciate the many months of work and outreach that went into developing the draft ordinance before you today. However, we have several concerns that we would like to raise for your consideration.

### **Caps on Vacation Rentals**

The proposed ordinance would allow the County to establish a cap on VRs as a percentage of single family units within the VR Exclusion Combining District, which could have detrimental effects on Hosts and the local economy. Airbnb has played a critical role in the County's recovery from the pandemic, lifting up local Hosts as well as entire local economies. The typical US Host on Airbnb – including here in Sonoma County – earned about \$13,800 in 2021, equal to two months of pay for the median US household. Each Host and property supports several other local small businesses including, for instance, maintenance, housekeeping, management, and landscaping. Moreover, Airbnb has had a voluntary collection agreement with Sonoma County since 2016, collecting and remitting transient occupancy taxes on behalf of Hosts and providing an important revenue stream for the County. Capping VRs in high visitation areas would significantly reduce these revenues.

We are particularly concerned by the proposed cap on vacation rentals of up to 10% of housing stock, a blunt policy tool with the potential for unintended consequences. A number of areas within Sonoma County have long been popular visitor destinations, given the abundance of wineries and restaurants, rich history, and access to nature. They have traditionally had higher concentrations of VRs that help serve the high volume of visitors. As the Eyer Report on Vacation Rentals and Home Prices in Sonoma County (December 2021) points out, 13.4% of single family units in Monte Rio are VR, and 11.2% in Guerneville. If the County chooses to move forward with

caps, we urge it to take a data-informed approach that accounts for the historic availability of VR in each neighborhood, and set aside the arbitrary 10% benchmark.

Moreover, this approach should also be informed by the negative economic impact the proposed cap would have on local businesses that rely on visitor travel. On the heels of two years of lost income for small businesses due to the pandemic, now seems to be exactly the wrong time to limit visitors, as many of these small businesses are trying to get back on their feet.

### **New VR Exclusion Zones**

The proposed ordinance would rescind the existing “X Zones” and establish new VR Exclusion Zones based on the unsubstantiated logic of protecting housing stock, reducing fire hazards, and serving public interest. First, the Eyler Report itself concludes that there is “little to no connection between the rise in single-family housing units offered as short-term rentals and single-family home prices”. Capping VR would therefore be unlikely to protect housing while also eliminating many important benefits to Hosts and the local economy. Second, there is no demonstrated connection between fire hazards and VRs that merits using this as the basis for establishing new VR Exclusion Zones. The County already requires tourists to evacuate during voluntary orders, so this would be both redundant and unnecessary. And third, The final criteria outlined as a basis for new VR Exclusion Zones – “Other areas where the Board of Supervisors determines that it is in the public interest to prohibit the establishment and operation of vacation rentals” – is extremely broad and invites government overreach. While this is an existing criteria for the establishment of X Zones under Ordinance 6145, we strongly urge the County to retire its use.

Finally, the staff report recommends that County staff identify these zones and bring them back to the Planning Commission at a future date. This two-part process creates opportunities for inconsistency, while creating tremendous uncertainty for Hosts across the County. We urge the Planning Commission to ask staff to specify the impacted areas before taking this proposal to the Board of Supervisors.

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Thank you for taking our comments into consideration as the County deliberates the proposed ordinance. As always, we would welcome an opportunity for discussion and collaboration to help ensure that the County’s regulations are fair and reasonable.

Sincerely,



Toral Patel  
Airbnb Public Policy