

From: [Niall Browne](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: <https://www.thesearanchhostingcoalition.org>
Date: Monday, July 26, 2021 5:04:16 PM

EXTERNAL

Hello,

As per this petition I object to these unnecessary proposed changes being made regarding Sea Ranch short term rentals.

Thanks,
Niall

" 2. **We strongly oppose** restrictions on whether and when owners may rent their properties as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" ([here](#), page 4a8). These restrictions include limits on the number of days a home can be rented, a reduction in the total number of rental homes and a minimum of 300ft between any two rental properties. "

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From: [Megan Cole](#)
To: [PRMD-LCP-Update](#)
Subject: TSRA Board Model Rule 6.7
Date: Thursday, July 22, 2021 6:59:49 PM

EXTERNAL

Hello Sonoma County Planning Department,

My grandparents built our home at the Sea Ranch back in the 1980s after having held the land since the 1960s. So our Sea Ranch home is a very special place for us. I am writing to ask you to please **reject** the The Sea Ranch Association (TSRA) Board Model Rule 6.7 regarding restrictions on whether and when owners may rent their properties.

The ability to rent a Sea Ranch home should be the owners choice. Its prohibition requires a clear justification, which has not has been provided: TSRA has not done any studies, engaged any consultants or expressed no opinion on the effects of the proposed restrictions. This is completely irresponsible and so unfair. Especially to those of us who have been honest and responsible contributors to the Sea Ranch community for over 50 years now!

Please **reject** the The Sea Ranch Association (TSRA) Board Model Rule 6.7 regarding restrictions on whether and when owners may rent their properties and do not delegate the creation of performance standards and/or restrictions to the TSRA Board.

Thank you for your consideration.

Megan M. Cole

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From: [John Dick](#)
To: [PRMD-LCP-Update](#)
Cc: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#)
Subject: Sonoma Planning Committee Meeting on Short Term Rental-July 26, 2021 Input and Comments
Date: Friday, July 23, 2021 11:50:39 AM
Attachments: [6c46b9_efdd0c3802cf4d69b60efd1aee353a6c.pdf](#)

EXTERNAL

I understand and sympathize with the general intent of the Sonoma County Short Term Rental Planning Committee Taskforce, and generally support the introduction of reasonable performance standards determining how Short Term Rentals are operated as proposed in the revised Local Coastal Plan. I oppose restrictions on whether and when owners may rent their properties, as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7".

As personal background, we are Sea Ranch property owners, my family currently spends about 20%- 40% of our time at Sea Ranch, and love it there. Our daughter and grandkids have grown up there. We have been renting out our property as a vacation rental, for over 20 years through local agencies some of which use the internet for advertising and booking. To my knowledge, and following up with our neighbors, there have been no complaints or problems. Renting our property has given us the ability to subsidize a home and achieve and share coastal access which in our early years would have been unaffordable.

I appreciate the effort the Sea Ranch Board of Directors have put into the Sea Ranch "Model Rule 6.7" input to Sonoma County. In the beginning, I was impressed with the thoroughness, intent, practicality and pragmatism with which the The Sea Ranch Short Term Rental Task Force (STRTF) first started. But last minute unsupported additions to the input related to quotas and density restrictions have destroyed the original equanimity they experienced.

The Sea Ranch is not a residential community. 69% of the houses are second homes, and approximately 20% of houses are used as short term rentals. The ability to rent a Sea Ranch home is a valuable asset. Its prohibition or restriction is a serious breach of personal property rights, counter to Sea Ranch CC&Rs intent, and should require clear justification. None has been suggested.

Proposed restrictions by TSRA Board members in their "Model Rule 6.7" submitted to Sonoma County include a cap on the total number of STR properties at The Sea Ranch, a maximum of 180 days each year that a home can be rented, and a minimum distance of 300 ft between STR properties. These density and quota restrictions were added at the last minute by the Board without further evidence, without study of the consequences, without substantive member consultation and in the face of strong opposition from members. Unfortunately, I can only believe that owners with rentals are either pale with fear, or red with anger. I believe the current input as proposed by a minority of residents, at the last possible minute, reflects a

hidden intent to ban rentals and restrict coastal access through density and quota limits.

Ability to rent your property has been historically an approved and accepted part of TSR ownership, and in some cases the only way owners could afford their homes. They make up about 20% of the membership, and are going to be severely discriminated against by a small minority of vocal and politically influential number of Sea Ranchers.

I have attached a copy of “ The Sea Ranch Hosting Coalition Submission to Sonoma County Local Coastal Plan July 26 2021” which I support, and includes many references contained in my input.

I appreciate the Sonoma County Planning Commissions taking the time to review this.

John Dick

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From: [Cari Cadwell](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: The Sea Ranch Association and its involvement in rental properties at the Sea Ranch
Date: Wednesday, July 21, 2021 1:51:54 PM

EXTERNAL

To whom it may concern,

I am a home owner up at the Sea Ranch on the Sonoma County Coast. It has come to my attention that the Sea Ranch Association now wants to regulate when we can rent our homes, the amount of days we can rent our homes as well as the distance between two rental properties.

This is not acceptable. This is asking home owners to non voluntarily promote Segregated Housing! It is against the law in California.

The definition of Segrated housing is

Housing segregation refers to **the discriminatory treatment practiced on African American or other minority groups** in U.S. It is the practice of denying equal access to housing or available units through the process of misinformation, denial of realty and financing services, and racial steering.

The Sea Ranch Association is not acting appropriately. This puts the homeowner at risk once the home owners allotted rental days have been met. Being a Sea Ranch home owner I am not going to refuse any group of people from renting my home just because a Association has declared that I have used up my allotted rental days for the year. This is asking the home owner to discriminate denying equal access to housing or available units.

Please shut down this ludicrous idea of monitoring rental properties from the seat of a Association. This current Association has far over stepped their boundaries and it is time to stop all this craziness. People from all walks of life need to be able to enjoy the Sea Ranch not just the owners who own property. All people need to have access to available rental units. Access needs to be 360 days a year.

Common sense and using ones wisdom surly shows that having the Sea Ranch Association involved in any way with homeowners renting their properties is not a good idea. They are not in the rental property business and have clearly shown that what they are proposing is not well thought out.

I am not interested in breaking the law regarding fair housing or equal access to available units on the Sea Ranch for a Association who wants to have home owners discriminate on their behalf.

Cari Faso
150 White Fir Wood

Sea Ranch Ca
510-410-0517

PS Currently the Sea Ranch does not have enough rental properties available for short term rentals. Sizing down on short term rentals is also a poor call by the Sea Ranch Association. Again everyone should be able to enjoy the Northern Coast and that includes Sea Ranch.

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Gary Helfrich](#)
Subject: FW: Comments re: LCP 7/26
Date: Monday, July 26, 2021 4:24:32 PM

From: Eric Fraser <truthintourism@gmail.com>
Sent: July 26, 2021 4:13 PM
To: PRMD-LCP-Update <PRMD-LCP-Update@sonoma-county.org>; PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Comments re: LCP 7/26

EXTERNAL

Hello Commissioners;

Thank you for the opportunity to participate.

Here is a summary of my remarks:

1) Public outreach should be more robust. Property owners, subject matter experts, residents, and visitors are being excluded because the outreach plan is poorly executed, dates are cancelled, this has been a long convoluted process. Staff claims robust public participation from what are the dozens of people who have participated over the years.

2) CCC, Permit Sonoma, BOS should consider the Lower Russian River as an extension of protections for visitors and the environment mandated under the Coastal Act.

3) Staff presents a bias against STRs by using misleading information, not bringing information supportive of STRs information forward, and by using misleading terminology.

-Gary claims that there is no way to "track vacation rentals" on the coast, however taxes are collected through the two leading booking platforms (Airbnb and VRBO) and also through professional management companies. During the recent "Vacation Rental Workshop with the BOS, they used statistics to paint the picture of the number of "vacation rentals"/STRs as excessive or problematic on the coast and by over inflating the number of "active" STRs inland (e.g. STR permitted properties that have hosted guests over the past year), the number of violations issued inland (and on the coast), the resolution of complaints, the handling of complaints created by their "web scraping" program, and many more issues.

-They refer to STRs as a "business", when they are permitted use of residential property. The data suggests that virtually all STRs lodge guests for less than 180 days in the aggregate in a year.

- They refer to "neighborhood character" without defining what that actually is.

4) Performance standards should apply not only to STRs but all properties.

5) The presentation ignored the inter-relationship with adjacent counties.

6) The staff mis-represented the issues with the TSR "new rules", in that they were not ratified by membership, and not applicable to the discussion. This appeared to be a way to reiterate staff's ideology that STRs create negative impacts in TSR and by inference in other areas that resulted in HOA regulations. We see this a ploy to reinforce the ideology that STRs are a business requiring a "business license", or have unmitigated impacts.

7) Misrepresents the housing stock on the coast (and inland) and introduces an ideology of converting second or vacation homes into workforce or affordable housing. Avoids information that shows regulation increases the inefficiency of built residential inventory to house people for short term, and usage beyond 30 days. More regulation means more empty bedrooms and homes!

8) Leaves out of the discussion (and won't release to the public) information about how STRs accomodated families evaluated during emergencies, house first responders, and for adaptive use other than use as "vacation rentals" during emergencies...

9) Did not adequately consider ADUs in the presentation.

Eric Fraser
Truth in Tourism
707.479-8247

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From: ckenber@sbcglobal.net
To: [PRMD-LCP-Update](#)
Subject: LCP Performance Standards
Date: Monday, July 26, 2021 11:09:37 AM

EXTERNAL

(I am resending this with a minor correction)

Good morning:

I am a Sea Ranch association member since 1977 and a home owner since 1985. We have rented our home on a short term basis since 1985 without incident. I've also served as the Chair of the Sea Ranch Board's Finance Committee for a number of years and as one of the architects of the very successful fiber optic network installed a few years ago.

I am one of the leaders of the Sea Ranch Hosting Coalition which includes some 200 Sea Ranch members. I support the implementation of performance standards across the coastal zone as you are recommending. I oppose the implementation of restrictions on short term rentals such as caps, number of days rented per year, or distancing. These have been proposed by the board of the Sea Ranch Association against the backdrop of overwhelming member opposition.

Short term rental restrictions may be appropriate in urban locations where there is a shortage of housing in residential areas. Sea Ranch was not designed to be a residential community and is not a full time residential community today. Around 2/3 of the homes on Sea Ranch are second homes. About 350 of these homes are available for short term rental - a number that has been consistent for more than 15 years. Short term rental income makes the purchase of a Sea Ranch home feasible for most buyers who rent - though it rarely covers the cost of ownership. Short term rental restrictions will not increase the availability of affordable housing with the least expensive Sea Ranch home now costing well over \$1 million.

Short term rentals on the Sea Ranch generate TOT income for Sonoma County, a voluntary 3.5% contribution to the Sea Ranch budget and around \$10 million per year in benefit to the local economy. Short term rentals provide affordable access to a beautiful segment of the Sonoma Coast for those who can't afford or choose not to purchase Sea Ranch home. Short term rentals have been a part of the Sea Ranch experience since its founding. They are not proliferating and the imposition of restrictions cannot be rationally justified.

I urge support of short term rental performance standards across the coastal zone and ask the Sonoma County Board of Supervisors not to delegate authority to the Sea Ranch to make up its own rules.

Respectfully,

Chris Kenber

ckenber@sbcglobal.net
925-838-2296 Home
925-787-0962 Cell

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From: [Anne Lown](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: [Rick Hecht](#)
Subject: Objection to rental restrictions
Date: Wednesday, July 21, 2021 4:01:16 PM

Dear Members of the Sonoma County Planning Commission,

As Sea Ranch residents and whose primary residence is Sea Ranch, my husband Rick Hecht and I want to express our concern and disagreement with the currently proposed rental restrictions that you will be reviewing on July 26. We bought our house four years ago knowing that we would rent it until we retired there one day. We have generally used the house once or twice a month and during covid, lived there for 15 months with extended family. That house is beloved by all of us.

Rental restrictions would cause us hardship and decrease the home's value if we were to sell it. We feel like the rules are being changed on us--without adequate preparation and discussion.

Further, we do not want to live in a restricted and exclusive enclave that includes primarily wealthy residents. We appreciate the renters who are good for the economy and bring life and fun to Sea Ranch. Plus, everyone should have the chance to visit the coast.

In particular, we object to the 300 foot rule, restrictions on the number of houses and the number of days one can rent.

Thank you.

I am open to careful and thoughtful discussions about our rental policy, but we have not--as homeowners and Sea Ranch residents--been invited into the conversation about rental restrictions. There has been a lot of discussion about a few party houses, but one board member said the party houses are not the main issue. He said the goal was to align resident/rental balance. I don't know what is out of balance? I am not sure what problem is being addressed here. The process has not been transparent. Please send this proposal back to Sea Ranch for open and healthy discussion before making a ruling. Thank you.

Anne Lown and Rick Hecht

--

E. Anne Lown, Associate Adjunct Professor
Department of Social and Behavioral Sciences
Affiliate Faculty, Osher Center for Integrative Medicine,
3333 California Street
University of California, San Francisco
San Francisco, CA 94118
(415) 502-2893, anne.lown@ucsf.edu

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From: cathy.mabry
To: [Scott Hunsperger](mailto:Scott.Hunsperger); Chelsea.Holop@sonoma-county.org; [PRMD-LCP-Update](#)
Subject: Sea Ranch Hosting Coalition and The Sea Ranch Board Short Term Rental Proposal
Date: Monday, July 26, 2021 2:00:15 PM

EXTERNAL

We have been Sea Ranch (TSR) homeowners for 36 years. Our home is used as a vacation getaway for family. It is not our primary residence. We have it on the short term rental market as it allows others to experience and appreciate all TSR has to offer. The majority of homes in TSR are second homes. Many are on this short term rental program as it is a “win-win” for both owners and guests. This market has been stable for many years. Our homes are held to a high standard based on existing Sea Ranch regulations. Our short term rental guests have been respectful of our home, property and Sea Ranch grounds. As the short term rental rates are usually \$250/night and above guests are here to appreciate our Northern California coastline. Regarding this Model Rule 6.7 proposed by TSR Board, I find it interesting that the Board is proposing short term rental restrictions without any input from members. There have been no credible studies, no facts upon which their proposal is based, no consultants hired to provide objective feedback regarding their short term rental concerns and no objective justification without this background research to support their proposal. In review of Model Rule 6.7 you will find it lacking in concrete evidence sufficient to warrant approval. As a Sonoma County resident I also want to bring up the financial ramifications if TSR Board proposal is approved. I believe the county gets a fairly substantial percentage of the TOT tax. Not having access to specific financial data I would guess there may be several thousand dollars annually in revenue. I don’t want to see us lose that by approving restrictive regulations without sound basis. I ask that you vote against TSR Board proposal. Thank you.

Sent from my iPad

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From: [\[redacted\]](#)
To: [\[redacted\]](#)
Subject: July 26 meeting Coastal Short Term Rentals
Date: Tuesday, July 20, 2021 2:11:19 PM

Hello,

It is my understanding that Monday's meeting will be to discuss limiting short term rentals under the Coastal Commission.

Please understand some of us depend on the income from short term rentals. I'm a disabled senior citizen who would need county assistance if you take away my income source. We don't need to cause more homelessness due to income squeeze and home loss.

Beyond me my home offers tranquility to visitors to reset and recharge. It helps society in this fast paced world.

My contention with limiting certificates or amount of days we can rent means limiting the general public from access to our coast. I find it fascinating that local officials don't get the benefits of a sharing society. The changes you are proposing would turn our community into a cold world were only rich can afford to live here. It would start to collapse the ability of small businesses, restaurants, stores, etc to survive.

We are becoming a nation of rich and poor with fewer middle class. Please understand that your actions will reverberate for years and change the resort atmosphere of our north bay coast.

Regards,

MJ

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From: [Teri Quatman](#)
To: [PRMD-LCP-Update](#)
Subject: Sea Ranch rentals
Date: Tuesday, July 20, 2021 7:28:15 AM

EXTERNAL

I support the rental program at Sea Ranch.
It is the faucet that attracts new homeowners to the ranch
and keeps our investment valuable.
I was a renter here for 10 years before I bought my Hedgegate house.
It would be germane to this question to study how many current homeowners
were once renters. I suspect a very large percentage!

If there are specific complaints (e.g., noise, littering, etc), those
complaints should be addressed versus a shutting down of all rental
activity.

Thanks,
Dr. Teri Quatman
39034 Hedgegate Rd.
The Sea Ranch, CA.

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From: [Sarah Hoople Shere](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: Please reject proposed restrictions from The Sea Ranch Association board
Date: Thursday, July 22, 2021 11:23:24 AM



Hi there,

My husband and I are homeowners at The Sea Ranch -- truly one of our favorite places on earth -- and plan to occasionally rent our house to offset the steep cost of ownership and to share The Sea Ranch with responsible guests.

We are very protective over The Sea Ranch and are committed to retaining its magic -- part of which has been the experience it's provided to visitors since its establishment. Like all other homeowners we know, we communicate strict standards of behavior to our guests so that The Sea Ranch experience is preserved for others. We've seen no evidence of negative consequences due to short-term rentals and strongly urge the commission to demand such an analysis before any restrictions be considered.

Thank you for your time and consideration.

Sarah Hoople Shere

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From: [Lars Thorsen](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: The Sea Ranch proposed rental restrictions would cause sever economic damage
Date: Wednesday, July 21, 2021 10:55:55 PM

Dear planning commission,

The Mendocino and Sonoma coast communities are highly dependent upon tourism. Tourism brings revenue and jobs to these communities during these very difficult times. Any considerations to imposing restrictions on rentals at TSR should be weighed against an economic impact assessment. My family and I own a home there and we are there frequently. We also do extend our home to short term rentals to offset the high costs of property tax, utilities and HOA dues. The economic damage to my family here would be significant if we were not able to continue to offset these costs.

The job creation which tourism creates on the Somona coast is significant and therefore the subsequent tax revenues also need to be considered. Rentals at TSR are fundamentally not a material issue on the Sonoma coast. The issue which is of paramount concern is affordable housing for the community. While I wish TSR would be the answer for this challenge, it simply isn't as the cost basis of the properties prohibit the economics to work. I would ask the board of supervisors and planning commission to redirect its energy to affordable housing to ensure an economically successful and prosperous community.

Thanks for listening

Lars Thorsen

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From: [Greg Ward](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: [malonsomartinez@tsra.org](#); [karen@amiel-phillips.com](#); [maggiecc@protonmail.com](#); [csjaap@gmail.com](#); [mkleeman@tsra.org](#); [nmoran@tsra.org](#); [snevin@tsra.org](#)
Subject: Submission to Sonoma County Local Coastal Plan July 26 2021
Date: Tuesday, July 20, 2021 12:56:19 PM

Commissioners:

My wife and I own the property located at 36574 Sculpture Point Drive, The Sea Ranch. We purchased the property in 2003 and have enjoyed it as a second home since then. We rent the home as a short term rental through Sea Ranch Escape, which manages the property, addresses any complaints that may arise, and pays the Sonoma County Transient Occupancy Tax on our behalf. Before buying our home we vacationed at The Sea Ranch for decades, taking advantage of the available short term rentals.

The Board of The Sea Ranch Association has submitted to the County a “proposed rule” of the TSRA as a “concept document” for your consideration in the evaluation of a need for a short term rental ordinance. First, it should be made clear that the rule has not been adopted by the Association pursuant to California Civil Code section 4360 and is opposed by a large number of Association members. The Board refused to take a stand on the rule at its meeting of June 26, 2021, voting to table the discussion. The characterization of the proposed rule as a “concept rule” is simply a deceptive means of presenting an unfinished, work-in-process as the final expression of the views of The Sea Ranch owners.

As fully explained by the Submission of The Sea Ranch Hosting Coalition, The Sea Ranch is unique from other short term rental areas in the county by virtue of the fact that it is not a traditional residential community: it has historically been a vacation destination, and the great majority of homes are second homes, with approximately 19 percent of all homes used as short term rentals. The number of short term rentals has not increased over the years – in fact, since 2005 the number of homes used for short term rentals has decreased from 366 to 339. Short Term Rental Task Force Presentation to Board of Directors 4-27-19. The “proposed” rule would be an unprecedented and arbitrary taking of private property. In particular, the rule’s restrictions on the number of days a home may be rented each year, the number of short term rentals available in the entirety of The Sea Ranch, and the proximity of one rental home to another are without any logical underpinning, and unnecessary to resolve issues raised by visitors to the coast.

Indeed, many of the issues and problems addressed by the proposed rule apply equally to permanent residents, who are also capable of disturbing the peace, health, comfort, safety and welfare of the community. For example, there is no justification for subjecting owners of short term rentals to the following requirements and restrictions, while not requiring the same of permanent residents:

1. Reporting the names of all persons living on the property;
2. Restricting occupancy based on the number of bedrooms;
3. Restricting the number of vehicles based on the number of bedrooms, and reporting vehicle descriptions and license plate numbers;
4. Restricting the number of dogs; and

5. Requiring commercial walk-in trash removal.

The owners of short term rentals should be responsible for problems created by renters, just as owners of any home at The Sea Ranch should be responsible for problems created by the occupants. Reasonable regulation is appropriate. But proposed rule 6.7 tramples on property rights, grossly exceeds what is necessary to address any unique problems created by visitors to the community, and opens the door to further micro-regulation that will greatly exceed the scope of the restrictions already in place in the Association's CC&Rs.

I am hopeful the County will be careful to consider the benefits of short term rentals at The Sea Ranch to the vitality of the coast.

Greg Ward

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From: [Molly White](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: bob.wood@zgf.com
Subject: As The Sea Ranch homeowners, we oppose TSRA Model Rule 6.7
Date: Friday, July 23, 2021 11:56:05 AM
Attachments: [image001.png](#)
Importance: High

EXTERNAL

Hello, I and my husband Robert Wood, as owners of a home at The Sea Ranch that we make available for short term rentals, we urge the Sonoma County Planning Commission and Board of Supervisors to reject the restrictions in the proposed Sea Ranch Association Model Rule 6.7 and not to delegate the creation of performance standards and/or restrictions to the TSRA Board. We support the position and statements provided by the Sea Ranch Hosting Coalition; we urge the Commission to dismiss the unfair, unnecessary and financial devastating recommendations being developed by a very small minority of TSRA homeowners and protect the rights and needs of the majority.

I would appreciate a response to this email.

Thank you.

Molly White | [Dyne Therapeutics, Inc.](#)
Vice President, Global Head, Patient Advocacy and Engagement
830 Winter Street
Waltham, MA 02451
O: +1.781.786.8230
C: +1.650.438.7310
F: +1.781.786.8866



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From: [Cathy FitzGerald](#)
To: [PRMD-LCP-Update](#)
Subject: Short term rentals Sea Ranch
Date: Monday, July 19, 2021 4:16:12 PM

EXTERNAL

The Association's task force was biased and obvious. Many of us have owned homes at the ranch for many years (for us 18), had our homes on a rental market (Sea Ranch Escape) when we were not there. Yes, currently there are some issues. These can be addressed individually. This blanket approach to making part time residents, who by law have the same rights full time residents do, is divisive and unnecessary. Our CC&Rs are the same. Our deed restrictions are the same. We live there to hold dear that we tread lightly on the land and hope our offspring get to enjoy the same special place we have today.

Cathy FitzGerald
21/64

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From: [Chelsea Holup](#) on behalf of [PlanningAgency](#)
To: [Gary Helfrich](#)
Subject: FW: Comments re: LCP 7/26
Date: Monday, July 26, 2021 4:24:32 PM

From: Eric Fraser <truthintourism@gmail.com>
Sent: July 26, 2021 4:13 PM
To: PRMD-LCP-Update <PRMD-LCP-Update@sonoma-county.org>; PlanningAgency <PlanningAgency@sonoma-county.org>
Subject: Comments re: LCP 7/26

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2) CCC, Permit Sonoma, BOS should consider the Lower Russian River as an extension of protections for visitors and the environment mandated under the Coastal Act.

3) Staff presents a bias against STRs by using misleading information, not bringing information supportive of STRs information forward, and by using misleading terminology.

-Gary claims that there is no way to "track vacation rentals" on the coast, however taxes are collected through the two leading booking platforms (Airbnb and VRBO) and also through professional management companies. During the recent "Vacation Rental Workshop with the BOS, they used statistics to paint the picture of the number of "vacation rentals"/STRs as excessive or problematic on the coast and by over inflating the number of "active" STRs inland (e.g. STR permitted properties that have hosted guests over the past year), the number of violations issued inland (and on the coast), the resolution of complaints, the handling of complaints created by their "web scraping" program, and many more issues.

-They refer to STRs as a "business", when they are permitted use of residential property. The data suggests that virtually all STRs lodge guests for less than 180 days in the aggregate in a year.

- They refer to "neighborhood character" without defining what that actually is.

4) Performance standards should apply not only to STRs but all properties.

5) The presentation ignored the inter-relationship with adjacent counties.

6) The staff mis-represented the issues with the TSR "new rules", in that they were not ratified by membership, and not applicable to the discussion. This appeared to be a way to reiterate staff's ideology that STRs create negative impacts in TSR and by inference in other areas that resulted in HOA regulations. We see this a ploy to reinforce the ideology that STRs are a business requiring a "business license", or have unmitigated impacts.

7) Misrepresents the housing stock on the coast (and inland) and introduces an ideology of converting second or vacation homes into workforce or affordable housing. Avoids information that shows regulation increases the inefficiency of built residential inventory to house people for short term, and usage beyond 30 days. More regulation means more empty bedrooms and homes!

8) Leaves out of the discussion (and won't release to the public) information about how STRs accomodated families evaluated during emergencies, house first responders, and for adaptive use other than use as "vacation rentals" during emergencies...

9) Did not adequately consider ADUs in the presentation.

Eric Fraser
Truth in Tourism
707.479-8247

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July 20th, 2021

Sonoma County Planning Commission Members,

I write to you today as the grandchild of one of the original homeowners at The Sea Ranch. My grandmother and grandfather had a home built on a beautiful piece of Sonoma County coast in 1969 when all that surrounded their selected lot were incredible open fields and expansive ocean views. They (and ultimately just my grandmother) were proud home owners at The Sea Ranch for over 50 years until my grandmother's passing in 2020 at the age of 102. It gave her great joy to know that the younger generations of her family had come to love and cherish it as much as she did, and that she would pass on this special piece of our family history to the next generation.

I have been visiting the Sea Ranch my entire life (45 years), with increased frequency over the last 10 years since my daughter was born. We drive through Sonoma County (Penngrove, Petaluma, Valley Ford, Bodega Bay, Jenner, Guerneville, Stewarts Point) as many as a dozen times a year on our journey to what has become our second home. Our trips include stops at restaurants, wineries, gas stations and stores. Our love affair with Sonoma County started with The Sea Ranch but grew into a love of the entire Sonoma Coast and southern inland towns. We've spent many thousands of dollars in Sonoma County and brought countless friends to our family home over the years who have done the same.

Now, The Sea Ranch Association, is recommending to your Commission, provisions that will certainly guarantee that my family will be forced to sell my grandparent's home; the home they envisioned, built, cared for and loved for a half century – longer than just about any other home owner at The Sea Ranch. The home that they planned to pass to my parents, then to me, and to their beloved great grandchild; a 10-year-old who chooses trips to the Sea Ranch over trips to Disneyland and once drew that very same house her great grandparents built as her "dream house" for an assignment at school.

For over 50 years, our family has owned this home and used it as a private second residence. **We have watched and welcomed countless short-term renters in houses directly adjacent to and across from ours. They have come and gone for many years without incident. It seems unconscionable that we could be told that we are now not allowed to rent our home as well.** Ownership of our family home is passing to my elderly parents and we find ourselves in a position where the high cost of taxes, association fees, maintenance and general upkeep of a house on the coast is too high to manage. After 52 years of not doing so, we need to help cover the expense of the property through the short-term rental of our family home. You are being asked to consider provisions that will likely preclude my family from using our property as a short-term rental because we did not do so prior to a certain date (6.7.t). **Perhaps even more upsetting, simply because our neighbors have already been renting out their homes on a short-term basis, the Sea Ranch Association suggests that we should not be able to due to proposed "Density Limits" (6.7.aa).** I hope that you can see why this is highly problematic and certainly reeks of unequal treatment of homeowners- homeowners who live in the same neighborhood, pay the same taxes & fees and who may have the same need to rent their homes in order to not lose them.

I support common sense standards to ensure the protection of the beautiful Sonoma Coast and the nature, wildlife and residents who call this area home but **I do not support the proposed restrictions presented by the Sea Ranch Association.** Restrictions on short term rentals at The Sea Ranch will do harm to my family as well as many other families who pay taxes and participate in the communities of Sonoma County. There are no valid justifications provided for restrictions on the number of rentals, the number of nights a property can be rented or the “density” of rentals, however there *are* clear negative impacts if these standards are accepted. **These restrictions will eliminate the ability for people from a variety of income brackets, ages and backgrounds to continue to buy, own and enjoy properties at The Sea Ranch.** It forces out individuals and families who have spent generations caring for, enjoying and introducing the Sonoma Coast to others. It discourages new buyers from purchasing. It causes property values and tax revenues to fall, as families like mine are forced to make the heart-breaking decision to sell; flooding the market with homes that are unaffordable in a region without the job market or infrastructure to support a significant full-time resident population. It is a flawed proposal and it does damage not only to current homeowners, but to the future of The Sea Ranch and to the ability to keep this remote part of the coast accessible to home-buyers and visitors from all walks of life.

I strongly oppose the TSRA Board’s Model Rule 6.7 and/or other restrictions on short-term rentals at The Sea Ranch. **I ask that you do not support or endorse this rule and do not delegate standards or restrictions on The Sea Ranch to the TSRA Board.**

Sincerely,

Leslie Harbaugh

From: [JACOBS, Joseph](#)
To: [PRMD-LCP-Update](#)
Cc: [DK \(Kai\)](#)
Subject: Local Coastal Planning Meeting: TSRA proposals to modify Short Term Rental Use
Date: Monday, July 26, 2021 11:15:49 AM

EXTERNAL

Dear All-

We have been visiting the Sonoma Coast from Jenner north for more than thirty years. A little more than three years ago my wife and I succeeded to purchase a property in the Sea Ranch. Our plan is to move to the area within the next three years. Prior to that time, we are renting and would like to continue to provide our house as a vacation option to other by renting it.

We enjoy the rugged beauty of the Sonoma coast. We chose to rent our house because it helps us financially but we also have set up a place where others can enjoy the Sonoma Coast. We realize that rentals, if not well managed, could degrade the experience to permanent residents as well as other renters. We fully agree that short term rentals (STRS) need to balance use and impact. During our three years of renting, one-third of our rental income has gone into the community of the Gualala and the surrounding areas. In addition to providing access to the coast, well managed rentals provide significant dollars to the local economy. We have also invested substantially into the renovation of our house, providing additional income to the Gualala area.

We appreciate the need for Planning Department to review STR impacts on all of the Sonoma county coast. Our personal experience (as a renter and an owner) has been that the several rental agencies do their best to provide a good experience for the renters and residents. We agree with TSRA that as owners we are "motivated by the character of the natural environment.. and accept..the principle that The Sea Ranch must persevere the character for its present and future enjoyment".

We do not agree with some of the proposals made by The Sea Ranch STR committee. Specifically, we think **Model Rule 6.7** unfair and difficult to establish.

How will the Planning commission or TSRA determine

1. How to "Limit the total number of vacation rentals"?
2. Decide which units in proximity will be rented. Section 6.7.2 "Limits on the proximity of vacation rentals to each other".

We ask that you neither endorse the TSRA recommendations for STR management and more importantly, that this decision should stay with the commission so that the same standards are applied to all rentals (inside and outside The Sea Ranch).

Thank you for your considerations.

Joseph Jacobs
Danette Krueger

36549 Sculpture Point
The Sea Ranch.

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From: [Chelsea Holup](#)
To: [Gary Helfrich](#)
Subject: FW: Sea ranch short term rentals (Public Comment)
Date: Tuesday, July 20, 2021 10:06:16 AM

-----Original Message-----

From: James Snidle <jimsnidle@icloud.com>
Sent: July 20, 2021 10:06 AM
To: Chelsea Holup <Chelsea.Holup@sonoma-county.org>
Subject: Sea ranch short term rentals

EXTERNAL

Dear Chelse

I am a part timer in the sea Ranch community and live here six months of the year.
The remaining 6 months the home is a vacation rental allowing one couple to enjoy the beauty of the ocean.
I have never had a complaint from neighbors that do live here full time.
I am totally opposed to any restrictions on part time rentals in Sea Ranch.
It is also economically important to receive this income as I am semi retired.
We have been here for 4 years and have welcomed visitors with never one complaint. Visitors come for the beautiful serenity our space offers.
Please do not place any restrictions on our short term ability to rent our properties.

James Snidle

Daniel Rossomano

We live on Mariners Drive.

Sent from my iPhone

Sent from my iPhone

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From: [Sanjay](#)
To: [PRMD-LCP-Update](#)
Subject: Sea Ranch Short Term Rental
Date: Thursday, July 22, 2021 5:30:51 PM

EXTERNAL

I have owned a home in Sea Ranch for 30 years and have had my home on short term Rental for many years, it is my primary source of income, I am not sure how you have the authority to take away my ability to earn an income and do it effectively retroactively. Last I checked no one has the ability take the right to take away another persons ability to earn a living. What do you propose the compensation should be taking away my living?

Sanjay Sakhujia
20 South Linden Ave
South San Francisco, CA 94080
415 407-1919

www.dpi-sf.com

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From: [Eileen Ho](#)
To: [PRMD-LCP-Update](#)
Subject: The Sea Ranch Hosting Coalition, Submission to Sonoma County Local Coastal Plan July 26 2021
Date: Friday, July 16, 2021 8:35:55 PM
Attachments: [page2image2079699264.png](#)
[page2image2079768544.png](#)
[page4image2080943184.png](#)
[page5image2019333920.png](#)
[page6image2082731936.png](#)
[page7image2080237520.png](#)

EXTERNAL

Dear Planning Department,

For your consideration.

Thank you,
Eileen Ho, The Sea Ranch Homeowner
36804 Green Cove Drive
The Sea Ranch, CA 94597

The Sea Ranch Hosting Coalition

Submission to Sonoma County Local Coastal Plan July 26 2021

Summary

We are a coalition of property owners on The Sea Ranch who welcome renters to our homes responsibly on a short term basis. We provide public access to the Sonoma coast to a diverse range of visitors, supporting the local tourism economy and generating tax revenue for the County. Short term rentals have been part of The Sea Ranch since its founding and their numbers have not changed in the last 15 years [1].

We **support** the introduction of reasonable **performance standards** determining how Short Term Rentals are operated as proposed in the revised Local Coastal Plan (LCP, Program C-LU-1).

We **oppose restrictions** on whether and when owners may rent their properties, as proposed by The Sea Ranch Association (TSRA) Board in their "Model Rule 6.7" [10]. We present a detailed justification for this position in the attachment. In summary:

- The Sea Ranch is not a residential community. 69% of the houses are second homes [2018 census] -- approximately 20% of houses are used as short term rentals.
- The ability to rent a Sea Ranch home is a valuable asset. Its prohibition requires clear justification. None has been suggested.

- TSRA has done no studies, engaged no consultants and expressed no opinion on the effects of the proposed restrictions. This is irresponsible.
- TSRA's own Short Term Rental Task Force did not recommend restrictions, citing a lack of data, evidence or necessity.
- TSRA's proposed restrictions on Short Term Rentals in the coastal zone are beyond their authority, have not followed TSRA rules and are strongly opposed by TSRA members.
- There has been no proliferation of short term rentals at TSR -- the number has remained stable for more than 15 years.
- There has been tension between long term residents and renters for many years. Short term rental restrictions will not resolve this and represent a significant overreaction to a minor problem.
- Short Term Rentals make a significant contribution to the local economy and Sonoma County tax revenue. Restrictions would reduce these contributions.
- Increased utilization, if it occurs, is adequately addressed by performance standards.
- Short Term Rentals at The Sea Ranch do not displace affordable long-term rental housing because at current real estate prices, no properties at The Sea Ranch would be available at an affordable long term rent.
- There is no evidence of corporate ownership of rental homes at TSRA and it would not in any case be economically viable.
- The Coastal Commission does not support restrictions on short term rentals unless there is significant proliferation -- none is taking place at the Sea Ranch.
- Nuisance, whether caused by renters, second home owners or permanent residents, is not a significant issue at The Sea Ranch in part because its nuisance ordinances are already stronger than most Short Term Rentals performance standards.

Conclusion

The County of Sonoma should not support or endorse the TSRA Board's Model Rule 6.7 or other restrictions on Short Term Rentals at The Sea Ranch, nor should it delegate short term rental performance standards or restrictions on The Sea Ranch to the TSRA Board.

Such restrictions are inconsistent with the long history of The Sea Ranch welcoming visitors from all walks of life, and with TSRA CC&Rs. They are not supported by TSRA members,

not based on credible studies or facts and are very damaging both to public access and to owners who rent their home on a short term basis.

We support reasonable performance standards -- indeed we already exceed them and have done so for decades. We look forward to working with the County of Sonoma on establishing reasonable short term rental performance standards through the LCP.

Attachment. DEFINITIONS

Restrictions refers to regulations that would determine **whether** or **when** an owner can rent their home as a short term rental. **Performance standards** prescribe **how** a home may be rented.

Proposed restrictions by TSRA Board members in their "Model Rule 6.7" include:

- A cap on the total number of STR properties at The Sea Ranch
- A maximum of 180 days each year that a home can be rented
- A minimum distance of 300 ft between STR properties

SHORT TERM RENTAL RESTRICTIONS ARE UNNECESSARY FOR THE SEA RANCH

The largest category of TSRA properties is vacant 2nd homes, representing 69% of its housing units (2018 census). The Sea Ranch Association estimates [1, page 7d46] that 365 homes on the Sea Ranch (20% of the total) are Short-Term Rentals and that this percentage has been stable for 15 years. This number is consistent with the number of TOT permits reported by Sonoma County.

There are 1,134 people in 604 households (2018) permanently resident on the Sea Ranch. They are 92.9% white, <1% asian and 6.3% other races, older (median age of 66.1), highly educated (41.4% having a graduate or professional degree) and affluent (mean household income \$116,782) [2,3,4].

Since the large majority of Sea Ranch owners are white and wealthy, short term rentals represent the only realistic path to diversity. Short term rentals are relatively affordable, providing access to Sea Ranch's natural beauty and amenities for people who cannot yet afford to purchase a house.

The Sea Ranch demographics are changing as younger owners, some with children, are now buying, driven by the pandemic and the availability of a state of the art fiber optic network. This has also driven real estate prices up substantially. Over time this may reduce the proportion of permanent residents.

The Sea Ranch has been a popular vacation destination for short term renters since its founding. Many purchasers of Sea Ranch real estate begin as renters. In 2019, The Sea Ranch generated \$1.5 million of Transient Occupancy Tax revenue for Sonoma [1, 7d48] and over \$350,000 in voluntary contribution revenue to The Sea Ranch Association (6% of the Association's budget [5]) directly from short-term rentals.

With its high proportion of vacant second homes, The Sea Ranch is not primarily a

residential community. TSRA has misstated the density of STRs at The Sea Ranch: In their report [1, page 7d28] a geographic image of the North 2 region of TSR purporting to show “high” density of STRs shows 20% of the lots¹ as STRs, slightly more than the long-term historic rate for the Sea Ranch. There are a few isolated streets with higher density, as chance would dictate. The Sea Ranch is not suffering a proliferation of Short Term Rentals, even at the North end.

The California Coastal Commission was established in part to protect public access to the coastal zone. Public access at The Sea Ranch consists mainly of access to affordable Short Term Rental accommodation and thereby access to the trails and coast along with specific public access to certain beaches.

Coastal Commission approval of some Local Coastal Plans that include restrictions on Short Term Rentals has only addressed communities that are different from The Sea Ranch, with higher population density, larger household sizes, more families, proximity to higher education institutions and fewer vacant units [6]. These communities also offer hotel accommodations providing alternative public access.

According to the Coastal Commission, restrictions on Short Term Rentals are appropriate in the Coastal Zone only where proliferation of STRs presents a genuine threat to the character of the community. This is not the case at The Sea Ranch as STRs have always been present at their current levels.

LEASING IS EXPLICITLY ALLOWED IN THE SEA RANCH CC&R’s AND is A VALUABLE ASSET TO HOMEOWNERS

The Sea Ranch Common Covenants & Restrictions (CC&Rs) explicitly provide an exception to their restriction to residential use for “the leasing of any lot from time to time by the Owner thereof” [7, 3.02(c)(3)]. Sonoma Country also considers short term rental to be a “residential” activity with respect to Zoning ordinances. Removing or restricting this right would have a major impact on Sea Ranch owners who rent their homes and requires compelling justification. This is not provided either in the TSRA STR Task Force report or in Model Rule 6.7.

For many owners, renting their home on a short term basis is the controlling factor in enabling their purchase. It is what makes ownership affordable. For people who do not presently rent their home, the ability to do so is an asset that can protect them in a time of need.

Second generation owners who inherit their Sea Ranch home from their parents may only be able to afford to keep the home if they earn income from short term rentals. Only the very affluent, who can afford to maintain a vacant home during their own absences, will be able to purchase a home that cannot be rented due to the restrictions.

¹ Across the ranch, 20% of the lots are vacant, so it is more than 20% of the *properties* that are STRs.

Restrictions on short term rentals take this valuable asset away from homeowners. This can have a serious effect on a family’s finances, perhaps forcing a sale of the home.

THERE HAS BEEN NO STUDY OF THE PROPOSED RESTRICTIONS

The TSRA Board has conducted no study, engaged no consultants and offered no opinion on the expected impacts of the proposed restrictions, either with respect to the supposed problems they will solve or to the financial impacts on members, the Association and public access to the coast. Specifically, the Board refuses to state whether they expect the restrictions to significantly reduce visitor numbers, despite repeated requests.

By failing to properly study the proposal or properly consult members, the TSRA Board has not acted in good faith. This is not an issue where the county should defer to the TSRA Board's supposed authority or expertise since it lacks either.

TSRA's OWN SHORT TERM RENTAL TASK FORCE DID NOT RECOMMEND RESTRICTIONS

The TSRA Board established a Task Force to consider regulation of Short Term Rentals in the spring of 2019. The Task Force collected data and held several public meetings for member comments and produced a report in December 2020 [1] recommending the introduction of performance standards.

The Task Force explicitly considered the topic of restrictions and concluded that they would **not** include any restrictions in their proposal because:

"(1) Not enough irrefutable data could be collected to support decisive recommendations, and (2) It is unclear if these more restrictive density policies will be necessary. Said differently, the TF hopes its initial set of recommendations will reduce STR problems to the point that some density limitation recommendations are not needed." [1, page 7d26]

(note that in the reference it is clear that "density policies" refers to all the types of restrictions now proposed in Model Rule 6.7)

Restrictions were subsequently added by the Board without further evidence, without study of the consequences, without substantive member consultation and in the face of strong opposition from members.

THE PROPOSALS OF THE TSRA BOARD DO NOT REPRESENT THE VIEWS OF MEMBERS AND ARE BEYOND THE AUTHORITY OF THE TSRA BOARD TO ADVOCATE

Model Rule 6.7 has not been published for public comment as is required for a new TSRA Rule, or put to a vote of the members. Most TSRA members are unaware of this proposed rule. Multiple board meetings have produced overwhelming objections from members present.

The TSRA Board lacks legal authority to lobby the county or Coastal Commission on behalf the

² Association because courts have made clear a HOA cannot limit STRs in the coastal zone

THERE IS NO PROLIFERATION OF SHORT TERM RENTAL PROPERTIES AT THE

SEA RANCH

The TSRA Board states as justification for their Model Rule 6.7: *As with many living systems, community is difficult to build, and easy to disrupt, even destroy. Sometimes, particular shifts and innovations occur that need fairly quick responses to prevent significant harm from occurring. Such is the case with the rise of online vacation rental platforms. These platforms have supported the commercialization and “hotel-ification” (sic) of residential communities across the nation. In these cases, **uncontrolled and unmanaged growth of STRs** has eroded people’s sense of safety and their connection to one another, and risks changing a community’s character in perpetuity.*

The TSRA Short Term Rental Task Force itself [1] identified that the number of Short Term Rental properties at The Sea Ranch has been stable at about 20% of properties for at least 15 years.

The Model Rule assumes that “*proliferation of STRs*” is the major cause for action but the evidence shows that there is no growth of STRs at The Sea Ranch. The TSRA Board cites “problems” that may exist elsewhere as justification for their proposed restrictions. These problems have not been demonstrated at The Sea Ranch - which has had hundreds of STRs since its inception and has welcomed generations of a diverse public to share in the beauty of the Sea Ranch.

TENSION BETWEEN HOME OWNING COMMUNITIES ON THE SEA RANCH

There is a long history of tension between Sea Ranch residents and short term renters. During the Coastal Commission building moratorium in the late 1970s, a group of homeowners threatened to take the Commission to the Supreme Court to oppose their demand for public access to Sea Ranch beaches. The 1980 Bane Bill resolved the issue, providing public access to beaches as well as other very substantial changes to the Sea Ranch. These changes included a sharp reduction in the number of lots and the requirement to provide low-cost employee housing on the Sea Ranch.

² Lamden v. La Jolla Shores Clubdominium Homeowners Assn (1999)

Some residents object to the presence of short term renters and in particular their utilization of Sea Ranch amenities like the recreation centers. The voluntary contribution of 3.5% of rental revenue to the Sea Ranch by owners who rent, introduced in 1991, was an attempt to solve this problem. (The Sea Ranch as an HOA is not empowered under the Davis/Stirling act to levy taxes). In the recent past, former community manager Frank Bell, in response to a rising tide of complaints from residents, wrote in the Sea Ranch Bulletin that Sea Ranch was not originally designed for permanent residence and short term rentals were always an integral part of the founders’ vision, saying that renters have every right to be at the Sea Ranch.

Pressure to restrict short term rentals, evidenced in Model Rule 6.7, may be driven in part by this same dynamic. It is entirely understandable that some of these tensions exist. But long term restrictions on short term rentals proposed by Model Rule 6.7 are not the right way to fix the situation. The Sea Ranch is about to embark on the creation of a long term strategic plan. This is precisely the project within which these and other issues should be resolved.

SHORT TERM RENTALS MAKE A SIGNIFICANT CONTRIBUTION TO THE LOCAL ECONOMY

³

With conservative assumptions, an average vacation rental home at The Sea Ranch

contributes over \$30,000 per year directly to the local community. Across 365 homes, this is an annual contribution of well over \$10 million. This does not include non-essential improvements owners make to their homes that support local construction businesses. Significantly curtailing this revenue would seriously impact the local economy. There is already a shortage of critical local service providers. Any reduction in short term rentals and the consequent impact on ownership would make an already serious problem worse.

INCREASED UTILIZATION IS ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS

The Sea Ranch Association Board claims there has been a significant increase in visitors in recent years [1]. Since the number of STR properties is not growing, this could only occur through increased utilization. They infer this increased utilization [1] from a one-off increase in Sonoma TOT revenue between 2017 and 2018, a 14% increase in number of rented nights per unit between 2016 and 2019⁴ and an increase over time in TSRA 3.5% fee revenue (the latter is in line with inflation). This is hardly compelling.

Homeowners at Sea Ranch have, over five decades, made their homes available to vacation renters and have demonstrated admirable responsibility in ensuring that renters conform to Sea Ranch standards. Nuisance is caused by both second home and permanent residents as well as renters. There is no evidence that renters cause any more problems than other categories of owners. The Sea Ranch has an outstanding rental performance record.

³ Average 40 x 3 day stays per home, \$500 guest spending per stay in local businesses, \$2,000/yr additional maintenance paid to local businesses, 3.5% TSR fee, Sea Ranch Connect and Sea Ranch Water company fees

⁴ They include projected 2020 figures data published early in 2020, but this is hardly reliable due to the difficulty of projecting a seasonally varying metric and the COVID-19 pandemic.

The Sea Ranch has in place and has recently enhanced nuisance rules (for all members) that are already stronger than most STR performance standards. Where there have been specific issues, TSRA has not enforced the regulations that are already in place. According to TSRA Security there were **20** noise complaints [8] associated with short-term-rentals in 2018 - the year presented with the highest number - and **19** complaints associated with owners and others. This represents one noise complaint per rental home every 18 years. This was *before* the introduction of enhanced nuisance rules which appear to have caused a significant reduction in complaints.

This data suggests the situation is well under control with The Sea Ranch's nuisance rules (Rule 6.6), which are currently being even further enhanced.

SHORT TERM RENTALS DO NOT DISPLACE AFFORDABLE HOUSING AT THE SEA RANCH

The Sea Ranch Association claims [10, 4a9], without evidence, that “*The proliferation of STRs has reduced the stock of housing available for long-term rentals. This has contributed to a housing crisis for moderate income and low income residents with employment in the region.*”

As noted above, there is no proliferation of STRs at The Sea Ranch, but the converse proposition that *reduction* in the number of STRs would *increase* availability of affordable long-term housing at The Sea Ranch is also simply not true.

None of the Sea Ranch homes now in the STR market would become housing options to fill that need, urgent as it is. A current Zillow search shows that no homes are available for sale on the Sea Ranch at less than \$1.1 million. Long-term rentals for these properties will not be “affordable”.

The result of Short Term Rental restrictions will not be more affordable housing. It will be more vacant or For Sale homes and a resulting reduction in both house prices [12] and public access to the coast.

CORPORATE OWNERSHIP OF STRs HAS NOT OCCURRED AND IS ECONOMICALLY UNATTRACTIVE

TSRA claims that there is a threat of individual or corporate investors descending on The Sea Ranch to purchase multiple homes for use as STRs. News reports of Marriott's marketing arrangement with Vacasa [13] have been wrongly characterized as such a threat.

This phenomenon has not been observed at The Sea Ranch. The economics of owning and renting an STR property purely for investment at The Sea Ranch are not at all favorable.

Allowing (generously) for \$50,000 gross annual income on a \$1MM property, after subtracting management fees (25%), property tax (~1% of property value), insurance (~\$4k), utilities and maintenance (~\$10k) and HOA fees (\$2.7k) the owner is left with less than \$10k. This is a 1% annual return on a \$1MM investment. This would not fund a loan.

There is no credible case for investor ownership as a threat to TSR.

THE COASTAL COMMISSION FAVORS RESTRICTIONS ONLY IN THE CASE OF PROLIFERATION OF VACATION RENTALS

The California Coastal Commission has stated [14]:

*... the Commission has **not** historically supported blanket vacation rental bans under the Coastal Act, and has found such programs in the past not to be consistent with the Coastal Act. In such cases the Commission has found that vacation rental prohibitions unduly limit public recreational access opportunities inconsistent with the Coastal Act. However, in situations where a community already provides an ample supply of vacation rentals and where **further proliferation of vacation rentals would impair community character or other coastal resources, restrictions may be appropriate.** In any case, we strongly support developing reasonable and balanced regulations that can be tailored to address the specific issues within your*

community to allow for vacation rentals, while providing appropriate regulation to ensure consistency with applicable laws.

This is a broad statement applying to the entire California coastal zone. It is appropriate in densely populated communities with families, children, and a robust long-term rental housing community. None of that exists at The Sea Ranch where only 1,134 [2] full time residents reside. Only 38% of the homes here are occupied by owners, 15% are renter occupied, a large majority are “vacant” using Census terminology.

Restrictions on STRs will diminish the availability of affordable vacation accommodations in an important coastal zone and leave the beauty of the northern Sonoma County coast to be enjoyed by a small number (1,134) of entitled property owners.

As noted above, the evidence proves there is no proliferation of STR homes at The Sea Ranch. The proposed restrictions are not *tailored to address specific issues* as the Coastal Commission suggests.

CONCERNS ABOUT VISITOR BEHAVIOR ARE ADEQUATELY ADDRESSED BY PERFORMANCE STANDARDS AND NUISANCE ORDINANCES

Current Sea Ranch owners who rent their properties on the STR market do so in a highly responsible manner. Overwhelmingly, short-term renters fit well into the Sea Ranch environment and cause few community issues. Very occasional nuisances are resolved in the field. Existing regulations on the Sea Ranch are perfectly adequate to deal with occasional challenges -- but they are not being enforced. And these nuisances are not confined to short term renters. The head of Sea Ranch security states that there is no problem resolving the small number of nuisances that arise.

The Board of TSRA argues without evidence, that “*Without reasonable regulation, STRs allow conduct that damages the tranquility, safety, and beauty of coastal communities.*” [8, 4a9]. They claim online vacation platforms are ‘*causing commercialization and “hotel-ification” of residential communities*’.

The Sea Ranch has never been, and is not now, primarily a residential community. The evidence is that there is no proliferation of STRs. The TSRA Board claims that *generic internet marketing* is resulting in an increasing number of visitors who do not evince the same respect for the natural environment and TSR’s strict rules as residents, or specifically Board members, expect. There is no evidence supporting this claim.

The TSRA Board appears to seek a reduction in visitors to the Sea Ranch without evidence or justification.

References

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

[2] <https://data.census.gov/cedsci/table?q=95497&tid=ACSST5Y2019.S0601>

[3] <https://data.census.gov/cedsci/table?q=95497&tid=ACSST5Y2019.S1101>

[4] <https://data.census.gov/cedsci/table?q=95497&tid=ACSST5Y2019.S1901>

[5] https://www.tsra.org/wp-content/uploads/2019/11/2019-20-Adopted-Budget-TSRA-ID_5336.pdf

[6] Comments on the Local Coastal Plan update submitted to the Planning Commission by Carmen Estrada, 3/25/2021 (*link*)

[7] https://www.tsra.org/the-sea-ranch-restrictions-articles-2-3/#Article_III

[8] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>

[9] TSRA Short Term Rental Task Force presentation 8/20/20, p20 <https://www.tsra.org/wp-content/uploads/2020/08/STRTF-August-8-2020-Meeting-8-24-corrected.pdf>

[10] <https://www.tsra.org/wp-content/uploads/2021/06/2021-06-26-TSRA-BOD-Reg-AgendaPkt-0a-Full.pdf>, page 4a8

[11] <https://ecms.newportbeachca.gov/Web/0/doc/2674168/Page1.aspx>

[12] <https://www.sciencedirect.com/science/article/pii/S0094119021000383>

[13] <https://www.vacasa.com/news/select-vacasa-homes-added-to-homes-villas-marriott-international> [14] <https://documents.coastal.ca.gov/reports/2018/4/w20a/w20a-4-2018-exhibits.pdf>

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From: [Laura Trombley](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Subject: Keep Sea Ranch Open
Date: Monday, July 26, 2021 1:02:29 PM

EXTERNAL

I am writing you to ask that you to reject the restrictions in the proposed Rule and not to delegate the creation of performance standards and/or restrictions to the TSRA Board. There are already many restrictions when it comes to Sea Ranch property and these restrictions would benefit only a few full-time residents who can afford to live here full time. This is elitist and would also hurt the local economy. I want to retire here and am very particular about any individual who comes to rent my property. Creating more rules to benefit the few is disappointing and against any fair standard.
Laura Trombley

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Life changes fast. Life changes in the instant. Joan Didion

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From: [Molly White](#)
To: [Scott Orr](#); [Scott Hunsperger](#); [Chelsea Holup](#); [PRMD-LCP-Update](#)
Cc: bob.wood@zgf.com
Subject: As The Sea Ranch homeowners, we oppose TSRA Model Rule 6.7
Date: Friday, July 23, 2021 11:56:05 AM
Attachments: [image001.png](#)
Importance: High

EXTERNAL

Hello, I and my husband Robert Wood, as owners of a home at The Sea Ranch that we make available for short term rentals, we urge the Sonoma County Planning Commission and Board of Supervisors to reject the restrictions in the proposed Sea Ranch Association Model Rule 6.7 and not to delegate the creation of performance standards and/or restrictions to the TSRA Board. We support the position and statements provided by the Sea Ranch Hosting Coalition; we urge the Commission to dismiss the unfair, unnecessary and financial devastating recommendations being developed by a very small minority of TSRA homeowners and protect the rights and needs of the majority.

I would appreciate a response to this email.

Thank you.

Molly White | [Dyne Therapeutics, Inc.](#)
Vice President, Global Head, Patient Advocacy and Engagement
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