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To: [Madrone, Steve](#)
Cc: [McNamara, Cade](#)
Subject: Public Comment, Short-Term Rental Ordinances
Date: Tuesday, February 27, 2024 9:52:37 AM

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Hello Supervisor Madrone,

I am writing to you as a constituent. I am requesting the ban on all whole dwelling unit STRs and short-term vacation home rentals be maintained, and support bed and breakfast establishments as currently described and permitted under existing regulations in support of the [land use element](#) and [housing element](#) of the Humboldt County General Plan.

The County of Humboldt has effective regulations in place that stop the practice of entire homes and dwellings being pulled from the housing stock to be used as short-term rental units for online services like AirBnB and VRBO. Vacation home rental, the transient use of a residential dwelling (meaning rental in units of fewer than 30 days), is an enumerated use and currently only allowed in a 2 square mile area near Shelter Cove. Even in this area a Special Permit is still required. This use is not described as an allowable land use anywhere else in unincorporated Humboldt County and it should remain that way. It may even be a benefit if the Board opts to dissolve the V-combining zone entirely as it applies to such a small area and in that area approximately 10% of the housing stock has been converted.

The county has the authority and ability to stop illegal businesses and unpermitted whole unit short-term rentals and simply has not. Instead the County is attempting to remove these restrictions and grant people with extra properties the ability to maximize their return on investment and generate passive income, which may be reinvested into more properties, while tenants and working people fight against a rising tide of housing prices and rents, and are in direct competition with those people buying housing to be used as short-term rentals. That rising tide is lifting all boats, but it's drowning those without one. The current ordinances do not even require the home-share short-term rental be conducted by a permanent resident or the property owner as is currently required by a bed and breakfast establishment.

Please remember that as you are making final decisions on these ordinances, that there are existing regulations, including a cap of 0% of the housing stock being available for whole unit short-term rentals out side of Shelter Cove, and that it is not an allowed use anywhere in the unincorporated areas of the Coastal Zone. The county has not enforced these regulation in the last couple of years as people rushed on the Humboldt County housing market while interest rates were low. This rush is also unlikely to be captured in either the 2020 census or the American Community Survey's often cited at public meetings, which are only projections based on the 2020 census and are not an active survey. If a 0% cap wasn't enforced, how can people expect enforcement of a complicated regionally specific cap with margins and flexibility? How can people expect that the individual per individual or business cap will be enforced when there was resistance to enforcement of similar caps described in the cannabis ordinances, and that the onus of adhering to those caps was ultimately placed on the permit holders?

If there is a need to modify existing bed and breakfast establishment regulations to include

additional safety standards regarding roads or the structures, those can simply be added to the existing regulations. Under the current framework those could also just be a condition of approval for the Special Permit that would be applied for. If people are unhappy with the cost of a Special Permit and see it as an onerous financial burden to attempting to start a business like a bed and breakfast, then establish an assistance program for low income people for all land use permit applications. Creating a new permit type with no public hearing requirement and little to no review isn't the way. The current fee schedule places the cost of an Administrative Permit as less than a Cannabis Permit Transfer. That seems incredibly low.

To allow any percentage of Humboldt County's housing stock to be converted to short-term rentals has been a dereliction of the responsibility to enforce the existing regulations, which is an obligation of the Planning & Building Department per Section [312-51.1](#) of county code, and allowing more wont drive business or build and maintain strong communities throughout the county. It's only going to help people with more get more, and burden people who have less with higher costs of living and exacerbate housing insecurity in the county.

The county does not need a new regulatory framework for vacation home rentals and bed and breakfasts, the county needs to enforce the existing regulations and make it easier for people to start businesses. These ordinances do not accomplish those goals as written.

Warm Regards