

Ramirez, Angelica

Public Comment

From: Erin Weber <Erin@axiomadvisors.com>
Sent: Tuesday, September 1, 2020 10:39 AM
To: Hartmann, Joan; Williams, Das; Hart, Gregg; Adam, Peter; Lavagnino, Steve; sbcob
Subject: Public Comment D4 STR



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Honorable Board of Supervisors,

We attended the California Coastal Commission hearing on May 10th 2018 when the CCC denied the proposed LCPA which would have limited STR in the Coastal Zone to commercial zones, a new historic overlay district that was limited to Miramar. We agree with the staff report which states that it is unlikely that the Board's previous direction from August 2018 will receive CCC certification due to the low number of STRs that would be eligible for permits. Only 41 STR properties would be eligible for permits, as conceptually directed by staff in 2018.

We encourage your Board to take a different direction that strikes a balance between protecting existing affordable, overnight visitor serving accommodations in Coastal Zone, and maintaining the character of our residential neighbors. This is possible, and we look forward to an opportunity to continue this dialogue with the County.

As you can see from the public comment received today, there is hardly any comments from the local Short Term Rental Property Management companies. That's because many of these key stakeholders were not aware of this hearing today.

Due to COVID, and the importance of this policy direction today, we ask for additional time for the industry to participate in a dialogue with the County on balanced solutions, that are poised for certification by the CCC.

However, if it's the pleasure of the Board to take action today, we recommend an alternative approach to the direction from August 2018, including **directing staff to further explore other regulatory approaches to encourage the continuation of existing rentals** (page 4-5 of staff report):

1. Concentration limits: set distance separation in geographic areas
2. Permit limits: set a cap for the number of permits issued
3. Rental agency only: require rentals to be managed by an agency
4. Night maximum: Nightly maximum to discourage party houses

We do NOT support:

1. Primary residence: require that the STR be the owner's primary residence
2. Minor CUP:
3. Homestays: require that the STR be occupied by the owner
4. Lot size

It is imperative that the County *regulate* short term rentals to collect the tax revenue and also oversee and establish rules for these uses. **But it is equally as critical that the County does not catalyze a loss of existing rentals, which provide affordable overnight accommodations for families seeking to recreate on the Coast.** Many of these pre-existing rentals have been responsible neighbors and businesses by paying TOT, registering with the County, and establishing and enforcing robust occupancy, noise, and parking regulations for guests. These regulations have worked and the vast majority of stays do not result in complaints.

There is already a shortage of short term rentals in SB, to serve the number of visitors & tourists each year. This creates a real hardship for young families, who are seeking to visit the beach and our beautiful community. The Coastal Commission will continue to deny LCP amendments that will result in a further reduction & loss of existing rental inventory. Therefore, we encourage your Board to set reasonable regulations for this existing industry.

Thank you for your consideration,

Erin Weber
Axiom Advisors