

## Lenzi, Chelsea

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**From:** timothyball@cox.net  
**Sent:** Friday, August 24, 2018 8:21 AM  
**To:** Williams, Das  
**Cc:** sbcob  
**Subject:** Coastal Zone STR's

Dear Supervisor;

I encourage you to direct staff to **abandon** the concept of a "Historic Overlay Zone" in favor of other approaches for permitting STR's in the Coastal Zone.

A "Historic Overlay", which bans STR's in certain communities while permitting them in others, is a fundamentally flawed approach which runs the risk of being rejected by the Coastal Commission, and or legally challenged for the following reasons.

- 1) The concept of an "expanded" Historic Overlay was previously proposed by staff at the 5/10/18 Coastal Commission hearing and soundly rejected by the Commissioners.
- 2) The county does not have adequate records of historical STR activity upon which to make a fair determination regarding which communities should include or excluded, based on a "historical" precedent.
- 3) Even if the Coastal Commission could be persuaded, allowing STR's in some communities while excluding them in others is likely to be challenged in court as unfair, arbitrary, discriminatory, etc.

As evidenced by the statements made at the 5/10 hearing, and subsequent revised findings, the Coastal Commission wishes to maintain and expand STR accommodations throughout all of Santa Barbara's coastal zone and therefore not disposed to accept any approach which bans STR's on a neighborhood by neighborhood basis. The hundreds of letters/emails submitted as testimony by families that have relied on STR's in all areas of the coastal zone for decades demonstrate the strong public support for maintaining STR's without exclusion.

The County's previous decision to ban STR's has already drastically reduced the number of STR's county wide to just ~146 remaining in the Coastal Zone. That is a very small number in relation to the County's size, population and number of annual visitors. Directing staff to put further effort into an "Expanded Historic Overlay, in hopes that it will be approved by the Coastal Commission is risky, unnecessary, and waste of tax payers money.

Please take this opportunity to direct staff to take a different approach; one that will maximize TOT revenues and does not divert staff time or financial resources away from other more serious and pressing issues.

Recommendations:

- a) Simply allow STR's to continue in the Coastal Zone as they have in the past for the time being, while waiting for best practice for regulating STR to evolve in other locations before revisiting this topic.

or

- b) Grandfather in all current STR's in the coastal zone (~146) and place a reasonable cap on the total number to be allowed moving forward.

Sincerely;

Timothy Ball; 5205 Austin Road, Santa Barbara.