

From: [Nile Sprague](#)
To: [Economic Development](#)
Cc: [Sonoma County Coalition of Hosts](#)
Subject: [EXTERNAL] Comments for May 10, 10AM - Economic Development Sub Committee Short-Term Rental Meeting
Date: Monday, May 9, 2022 11:33:31 AM

Hello,

I wish to submit comments in regard to the upcoming May 10, 10AM - Economic Development Sub Committee Short-Term Rental Meeting.

I agree with the recommendations already submitted by the Sonoma County Coalition of Hosts, copied below. Also, the requirement that someone is available to answer calls and respond to complaints 24 hours a day, including coming to the rental within 45 minutes to correct the problem in person if required seems unreasonable and honorous for a small time vacation rental to maintain, and should be removed from the ordinance. It's one thing if it's a hotel with a large number for rooms and thus the ability and necessity to hire a 24 hour receptionist or other person to be available, but when someone is renting one or two bedrooms or vacation rentals, this seems an unreasonable requirement.

Changes recommend by Sonoma County Coalition of Hosts:

1. Short-Term Rental Permit Application Fee and Duration

We propose an initial fee should be \$150 per STR bedroom, renewable every two years for permits in good standing at a fee of \$75 per bedroom. Other cities charge far less than our current fee. San Francisco is only \$450 for two years. Why start over every year, this is more work for City staff than is necessary.

2. Daytime guests-Hours and Limits

Daytime Hours of 7:00 a.m. and 10 p.m. should be aligned with the City ordinance. Limit the total number of daytime guests to 16 people for all Short-Term Rentals. This allows for people to have meals together, such as 8 couples for a lunch, or 4 couples plus their children. All noise, nuisance, parking and safety regulations must be observed. The current ordinance makes illegal a hosted rental of one bedroom having another couple over for lunch.

3. Parking Requirements

Short-term rentals should be allowed to contract for off-street spaces to meet the occupancy/parking requirement for their permit.

4. Events that follow occupancy, noise, and safety rules

Gatherings should be allowed that meet occupancy and parking limits, noise levels and other related criteria. No law should be created that prohibits the right of the people to peacefully assemble.

5. Host

The Urgency Ordinance states the owner must be present during hosted short-term stays. The practical problem here is sometimes an owner may need to leave on an emergency, have an impromptu business trip come up etc. that makes it impossible to follow the ordinance

without cancelling guests at the last minute. Why not make it owner or immediate, such as spouse, sibling, or adult child? This gets around the legal problem that could occur. In unhosted situations, there is no requirement to have someone present, so this minor change makes it easy for all to comply.

Allowing an immediate family member of the owner to host a Short-Term Rental also creates stable and affordable housing situations for them. Adult children, retiring parents, and siblings are examples.

6. Renters AND Owners

Many other jurisdictions give the same rights to owners and renters (with the landlord's permission) for hosted short-term rentals. This is a more egalitarian approach, allowing people at all income levels to participate, not just those of us lucky enough to own property. Imagine a single mom renter whose kid goes off to college. She needs the room available when they are home, but can host people at other times, so she can pay her child's college expenses. This is also true for seniors who sometimes want their grandchildren to visit.

7. 1000' Radius between vacation rentals

We believe a better way to regulate the number of non-hosted rentals is to limit the number of permits one owner can be issued, which is a position favored, by the majority of SCCH hosts who responded to our July 2021, Survey. If the allowed issued is a reasonable number, zoning restrictions, 1000' radius limit or cap on overall number of non-hosted short-term rentals will not be necessary. This would be fair to Santa Rosa homeowners, since every resident would maintain the same rights, and limits.

Regards, Nile Sprague