

From: [Kristen Haring](#)
To: [PRMD-LCP-Update](#)
Cc: [Chris Jaap](#); [Jennifer Merchant](#); [Neil Moran](#); [R Holmes](#); [crista lucey](#)
Subject: comments on Sonoma LCP Public Review Draft
Date: Thursday, July 22, 2021 3:36:11 PM

EXTERNAL

22 July 2021

We would like to take this opportunity to address a few provisions of The Sonoma Local Coastal Plan Revised Public Review Draft (LCP) that conflict, or create tension with, the LCP's express and repeated goal of promoting coastal access and visitor-serving recreational uses. The provisions, all contained in the Open Space and Resource Conservation Element, should confirm that human access for passive recreation is possible – and is, in fact, protected – even within areas that are habitats for marine mammals and seabirds. Such clarification is necessary because the entire Sonoma County coast could be described as such a habitat.

Policy C-OSRC-5b(1) (regarding environmentally sensitive habitat) states in subpart (4) that “[a]reas that contribute to the viability of plant and animal species for which there is compelling evidence of rarity” are considered environmentally sensitive habitats. “Compelling evidence of rarity” is an uncertain, purely subjective standard that provides no guidance. It undermines the clear standards established in the policy's first three subparts, and will spawn disputes regarding whether there is sufficient evidence of rarity.

Policy C-OSCR-5e(3) (regarding marine habitats) states that “[p]ublic access to offshore rocks and onshore nesting/rookery areas used by seabirds to breed or nest or which provide habitat for seals and sea lions shall be prohibited.” By addressing bird-nesting and seal-rookery areas with a single slashed phrase, the policy could be misconstrued to prohibit access to all areas that “provide habitat for seals.” That would result in a prohibition of access along the entire Sonoma County coast. A clearer statement should be made by using separate clauses, such as: “Public access shall be prohibited to offshore rocks and onshore areas while seals and sea lions are using them as rookeries, and to offshore rocks and onshore areas while seabirds are using them to breed or nest.”

Similarly, Policy C-OSCR-5e(5) (regarding marine habitats) states that “[d]isturbance of marine mammal haul-out grounds shall be prohibited and recreational activities near these areas shall be limited to passive recreation [and] [d]isturbance of areas used by harbor seals and sea lions shall be avoided.” This provision is overbroad and, again, contradicts the LCP's public-access goals. By failing to define “disturbance” and “passive recreation,” the provision could be misconstrued to mean that human activity near a haul-out ground is prohibited.

Finally, Policy C-OSCR-5e(6) (regarding marine habitats) encourages the California Department of Fish and Wildlife to monitor marine mammal haul-out grounds annually “to determine their condition and level of use by marine mammals” and “to incorporate this information into its management plan for marine mammals.” These provisions should acknowledge that there are numerous suitable haul-out grounds that marine mammals can and do use, and the number of such grounds in an area reduces the need to prohibit human activity on the relatively few accessible beaches.

Thank you for inviting comment, and for considering the comments made here.

Sincerely,
Kristen Haring
Roxanne Holmes
Crista Lucey
The Sea Ranch

cc

Chris Jaap, board liaison to LCP Working Group, The Sea Ranch Association
Jennifer Merchant, community manager, The Sea Ranch Association
Neil Moran, board chair, The Sea Ranch Association

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

To: PRMD – Local Coastal – Update Comment Letter

July 21, 2021

Our families have lived in the Timber Cove/Fort Ross area since the 1940's and are concerned about the information in the proposed LCP being incorrect and would like to meet with whoever is proposing changes on our properties so that corrections can be made. If changes are being made to anyone's property, they should be made aware of them before making the changes so they can contest it.

On Parcel 109-050-012:

Appendix B: Public Access Plan much of the information regarding Ocean Cove Campground is incorrect and we would like to have it corrected. Ocean Cove has had cabins and camping since the 1940's as well as day use. The offers of dedication were accepted and recorded as a condition to constructing a single family residence on the property after proper negotiation.

Also, why is the acquisition priority being moved to 1 Priority, and why is an additional offer to dedicate our boat launch being required when it has not been required for other boat launches.

On Parcel 109-210-005:

Our forester advised us to check with the county because it looked like they were changing the TPZ Zoning. I called and was told the zoning was not changing and we would like confirmation in writing.

Our Parcels 109-050-010 and 109-050-030:

These parcels were Tourist Commercial. Why are they being changed to Village Commercial and how does that affect us.

On Parcel 109-190-007, 20885 Hwy 1, Jenner:

Our two homes are the oldest in Timber Cove. We want to be included in Rural Communities Boundary. Also, the many homes in the Ocean Cove area should be included. The homes on both sides of 20885 Hwy 1 are included and ours are excluded.

It also appears Policy C-PA-1d that the Parks or County are going to require a public access easement requirement east of Highway 1 for any development. Would this include a home or home improvement? Please let the community know the details if you are going to want public trails around private homes.

I believe the community is still in the dark with the details of the proposed new LCP and more worried just about surviving the Covid Pandemic rather than studying this very complicated Coastal Plan at this time.


William McMaster


Gary Manaro

23125 Highway 1
Jenner, CA 95450



The Sea Ranch Association

975 Annapolis Road
P.O. Box 16
The Sea Ranch, CA 95497-0016

Administration

tel: 707-785-2444
fax: 707-785-3555

Tennis Wick, Director
PRMD
2250 Ventura Blvd.
Santa Rosa, CA 95403

RE: LCP Update

July 20, 2021

Dear Director Wick:

I am writing on behalf of The Sea Ranch Association to thank the Planning Commission and PRMD staff for being responsive to many of our comments and integrating them into the Local Coastal Plan Revised Public Review Draft submitted for public review and Commission consideration. We were quite pleased to see so many of our changes integrated into the revised document, but some edits have brought up new questions and a couple others linger. Discussion regarding those issues follow.

The Association is aware that individual members have also transmitted oral and written feedback regarding how the Revised Public Review Draft addresses issues such as Short Term Rentals and conflicts between the proposed Plan's public access and wildlife protection policies. As can be expected in any community, while there is broad agreement among residents in some areas, The Sea Ranch is not monolithic in its views so opinions differ in other areas. A letter specific to the Board of Director's action on its goals regarding Short Term Rentals was sent June 22, 2021.

POLICY ISSUES

Environmentally Sensitive Habitat Areas

OSRC 5B10, Page 21 and C-LU-4, Page 27- TSRA continues to be concerned about the impacts of ESHA's on the ability to develop remaining vacant residential sites and undertake remodels and additions as allowed in the 1982 Precise Development Plan. We appreciate the above-referenced proposed policies that attempt to address these concerns, including OSRC5B10, intended to resolve ESHA impacts that could constitute a taking, and C-LU-4, which proposes to develop a manual that guides project review process roles, responsibilities and steps. The efficacy of these policies will be largely dependent on their implementation, including careful consideration regarding the cost of mitigation or project limitations imposed and also the process by which such a solution would be developed.

OSRC 5B10- While paying fair market value for residential lots deemed undevelopable due to new ESHA mapping is potentially an elegant solution to an otherwise intractable challenge, TSRA suggests that we and other stakeholders be engaged in developing the implementation plan to ensure it is streamlined in a way that does not increase due diligence costs and clarifies TSRA and County roles and responsibilities. This could possibly also include adding this option to the manual suggested in the Land Use section, discussed in further detail below.

C- LU-4- This is another welcome concept proposed to resolve confusion about roles and responsibilities. TSRA respectfully requests that PRMD staff work with Association staff and stakeholders in the development of this document. Given the fairly recent change of perspective regarding the need to assess new residential development at The Sea Ranch for environmental impacts outside the Coastal Act, this should be a high priority. We suggest that the final LCP include a timeline for implementation.

Land Use

Pages LU-5- While TSRA was gratified to read in Paragraph 2 of Section 2 on LU-5 the clarity with which the language on this page expresses our land use authority, we do find this language appears in some cases to be in conflict with other policies in the Revised Public Review Draft and believe clarification regarding which conflicting policies would actually apply should be provided.

Page LU-10- Dedicated Open Space Areas- It is unclear to TSRA how and where the County intends to apply this land use designation to TSRA property held in common. While thousands of acres of TSRA commons are designated as open space, other sites on commons are developed for the purpose of private recreation uses and should not, solely by virtue of this land use designation be planned for or required to be set aside as open space. Perhaps this is TSRA's misunderstanding of the intent. If that is the case, we request clarification to that effect.

Page LU-22- Policy C-LU-6f- This policy supports potential new lodging development by suggesting an increase capacity of overnight lodging on Annapolis Road. While we cannot find that flight path restrictions applied to commercial airports are applied to private facilities such as The Sea Ranch Association Air Strip on Annapolis Road, sites along Annapolis Road have not been further developed in the past in part because of the understanding that flight path restrictions do apply. TSRA requests clarification on whether flight path restrictions do or do not apply adjacent to its air strip and that the specific sites being considered for overnight lodging be more specifically identified.

Page LU-26- Policy C-LU-2i- The reference to urban service boundaries seems to imply expansion of development at The Sea Ranch beyond the scope of what is currently zoned and/or allowed. It is unclear how this applies to the fixed boundaries of The Sea Ranch.

Land Use- Housing

Pages LU 3-4- This high-level look at LCP priority land uses creates unresolved conflicts that are evident in other sections. Recreation and Coast Dependent Commercial are listed as high priorities while affordable housing is listed as a low priority. TSRA would like to point out a couple concerns about this illogical ranking.

Page LU-27- C-LU-2 adequately and appropriately addresses both affordable and workforce (missing middle) housing and its role in supporting the desired focus on coast dependent commercial activity by noting impacts of long commutes on environmental sustainability.

These two concepts are incompatible.

Priority recreation and commercial land uses require the existence of workforce housing. Even the most highly paid staff at TSRA and other businesses cannot afford to live on the Coast, where they would have shorter commutes that reduce impacts on traffic, air quality and quality of life. Businesses are having trouble attracting and retaining employees. This impacts health care, fire safety, recreation and coast

dependent commercial business viability, which in turn impacts overall livability and destination desirability.

Many TSRA employees commute daily from as far as Cazadero, Guerneville, Forestville and Fort Bragg. Of the four dozen or so affordable housing units on the coast, 45 are at The Sea Ranch. These units provide housing for businesses in Gualala, in Mendocino County to the north, but do not support the more than 80 employees who work at TSRA or other nearby small businesses in Sonoma County.

TSRA stands ready to engage in future implementation measures that acknowledge and prioritize the dire housing situation on the coast so that coast dependent commercial development and its other support systems such as fire, health care and administrative needs can survive.

ERRATA

Public Facilities and Services

Pag PF-2, Table C-PF-1- Update numbers for The Sea Ranch Water Company. Current correct numbers:

- Lots Served 1,862
- Vacant Lots: 439

Page PF-13- Fourth paragraph: replace “The Sea Ranch, staffed by CalFire personnel funded through CSA 40” with “North Sonoma Coast Fire Protection District (serving The Sea Ranch and Annapolis), staffed by CalFire contract personnel” [note CSA 40’s successor agency is no longer involved in our funding stream]

Page PF-14- Second line: Correct name is North Sonoma Coast Fire Protection District

Emergency Medical Services section:

First paragraph, second line: delete “Gualala Health Center”; replace with “Redwood Coast Medical Services (RCMS)”

Second paragraph, third line- strike “of communities”—this is a typo.

Thank you in advance for considering our further comments.

Sincerely,

Jennifer Merchant
Community Manager

cc: Lynda Hopkins, Chair, Board of Supervisors

From: [Kathleen Alexander](#)
To: [PRMD-LCP-Update](#)
Subject: LCP Vacation Rental Program Policy Option Meeting 7/26
Date: Tuesday, July 20, 2021 5:31:18 PM

EXTERNAL

Dear Planning Department,

My husband and I own a home at the Sea Ranch. We just built the home, and received our final on July 1, 2020. (You were actually our planner when we came in to get our permit in Santa Rosa!). We had been renting at the Sea Ranch for 30 years before that. We rent our house part time, and live in it part time.

We have a great rental management company, and haven't had any problems with our renters annoying the neighbors. We're happy to have visitors enjoy the beautiful Sonoma coast, and our home. There are several other vacation rental houses on our street. (Which one of us homeowners would get to keep renting our home if this policy goes into effect and the Sea Ranch Association has the power to limit rentals to one every 300 feet?) We have never had any problems with the vacation renters on our street when we're here; in fact they are very respectful. The homes on either side of ours are both vacation rentals.

We enjoy seeing people walking by on the trails, and have noticed many more young families coming to the Sea Ranch, a welcome change! Covid brought many more people to this community, both owners and later, vacation renters, and I think part of the reason this proposal has been made is due to the obvious change in the number of people here. Everyone vacationing here is here to enjoy the coastal environment, as our family did before we had our own home, and it seems mean spirited to limit this access and try to keep it for just a certain group of people.

We weren't informed by the Sea Ranch Association Board that they were submitting a request to change the rules for vacation rentals, so it has come as a surprise, and frankly it's upsetting. The proposed restrictions seem like overkill meant to appease a small group of unhappy people. The property owners of the Sea Ranch were not informed about this proposal coming before the county in any of the many avenues they have to communicate with us.

We do have a Transient Occupancy Tax Permit, our management company has a business licence, and they collect and pay taxes for both Sonoma County and the Sea Ranch. We have garbage and recycling service through Recology year round. We limit the number of vacationers at our two bedroom house to four. We also have off street parking. All of these things are mentioned in the proposal as justification for limiting vacation rentals. Our vacation rental also employs Sonoma County residents for housekeeping, window cleaning, propane delivery, gardening service and general maintenance. Our vacation renters support the local economy when they come and patronize the grocery stores, restaurants, and gift shops.

Regarding the impact on the coastal environment mentioned in the proposal, from our observations, everyone stays on the well designated trails, which were meant to be used by all 2200(+) lot owners of the Sea Ranch, and their guests.

Please do not pass this proposal in any form. You would be giving a small group of people a

lot of power. What's next, will they limit the designated public parking lots and public access trails?

Sincerely, Kathleen and Tom Alexander
182 Sounding
The Sea Ranch, CA 95497
808-283-1166, 650-534-5006
182 [Sounding@gmail.com](mailto:182.Sounding@gmail.com)

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

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.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

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: [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

EXTERNAL

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and **never** give out your user ID or password.

From: [1mjmack](#)
To: [PRMD-LCP-Update](#)
Subject: July 26 meeting Coastal Short Term Rentals
Date: Tuesday, July 20, 2021 2:11:19 PM

EXTERNAL

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

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.

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.
Warning: If you don't know this email sender or the email is unexpected,
do not click any web links, attachments, and never give out your user ID or password.

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, do not click any web links, attachments, and never give out your user ID or password.

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

EXTERNAL

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

Chelsea Holup

From: Kyle Spain <kyle.spain@charter.net>
Sent: July 19, 2021 4:51 PM
To: Chelsea Holup
Subject: Sea Ranch - Short Term Rental Restrictions

EXTERNAL

Chelsea,

As an owner of a house in Sea Ranch, which I rent on a short term basis, I am opposed to the current restrictions being suggested by the TSRA (The Sea Ranch Association):

- 1) Restrictions on whether or when I can rent my house.
- 2) There is no proliferation of short term rentals in Sea Ranch (short term rentals have been stable for over 15 years).
- 3) It is not fair or needed for the TSRA to oversee short term rentals to the degree they suggest and charge a yearly fee as well.

Most importantly there has been no analysis of the effects of the proposed restrictions. The TSRA has conducted no study, engaged no consultants, and offers no opinion on the expected impacts of the proposed restrictions.

More control/restrictions by TSRA will not make short term rentals better. They will only make things more complicated for all owners while not fixing “problems” that do not exist in the first place.

Thanks for your time,

Kyle Spain
37067 Schooner Dr.
The Sea Ranch

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

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

EXTERNAL

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 Sonoma 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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

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

EXTERNAL

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

THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.

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



THIS EMAIL ORIGINATED OUTSIDE OF THE SONOMA COUNTY EMAIL SYSTEM.

Warning: If you don't know this email sender or the email is unexpected, **do not** click any web links, attachments, and **never** give out your user ID or password.