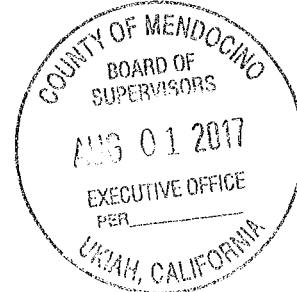




## EMPLOYERS COUNCIL OF MENDOCINO COUNTY

July 31, 2017

Supervisor John McCowen  
Chairperson of the Mendocino County Board of Supervisors  
County of Mendocino  
501 Low Gap Road  
Ukiah, CA 95482



RE: August 1, 2017 Agenda Item 5(c) Vacation Short-Term Rental Moratorium Ordinance

Dear Chairperson McCowen and Honorable Board of Supervisors:

The Employers Council of Mendocino County (ECMC) has reviewed the agenda item regarding the possible Urgency Ordinance establishing interim restrictions on the establishment of Short-Term / Vacation rentals. Although we recognize the need for additional housing in Mendocino County, we don't see this ordinance as the panacea or even a band-aid solution to addressing the need for more affordable and available housing in Mendocino County.

Below are some excerpts of the proposed ordinance with our brief questions and comments to follow:

WHEREAS, there is concern that a substantial and increasing share of the County's existing housing stock is being used as Vacation Rentals, thereby reducing the share of the County's housing stock that is available for either purchase or lease by persons desiring to work and reside within Mendocino County, which generally makes the remaining housing stock more expensive;

**How will this policy decision result in more available housing stock available for purchase or lease?**

**There seems to be many assumptions made, without evidence, that this solves a housing problem. What information is available to prove there are willing and capable buyers / lessees that can and will purchase or lease homes otherwise used for 2<sup>nd</sup> home / vacation rental use?**

**The use of the words "substantial" and "increasing share" of the county's existing stock is being used as Vacation rentals...**

**is not, from the information provided, a substantiated claim with actual data that helps determine the magnitude of the presumed problem being identified.**

WHEREAS, the lack of available and affordable housing for Mendocino County's workforce creates an impediment to recruiting employees for both private and public sector jobs and negatively affects business and economic development within the County;

**This is a true statement, but we see no evidence that an ordinance like this will solve that problem.**

WHEREAS, Vacation Rentals do provide benefits in that they provide an alternative type of overnight accommodation that may allow additional families or groups to vacation within the County, thus increasing tourism, stimulating the economy and filling otherwise empty vacation homes;

**Correct, and why would the only measurable evidence that benefits our county, be ignored?**

WHEREAS, without implementing regulations on Vacation Rentals, such rentals will continue to increase in number and continue to impact the number and affordability of housing units available for purchase or rental by persons desiring to reside within Mendocino County;

**This claim may or may not be true. However, if the rentals increase in number, it would be a result of the market's needs.**

WHEREAS, the absence of comprehensive regulations and procedures governing Vacation Rentals poses a current and immediate threat to the health, safety and welfare of the citizens of Mendocino County;

**Simply eliminating vacation rentals is not an alternative to "comprehensive regulations and procedures".**

WHEREAS, it is the desire of the Mendocino County Board of Supervisors to maintain the status quo and temporarily halt new Vacation Rental uses within the areas governed by the Inland and Coastal Zoning Codes, while, as set forth in Government Code Section 65858, County staff and the Board of Supervisors study the Vacation Rental issue and develop regulations appropriate for County and its residents.

**The "Vacation Rental issue" needs to be better defined before proceeding. Temporarily halting new Vacation Rental units does not maintain the status quo.**

ECMC feels it is disingenuous to try and link property owner's decisions to use their homes as vacation rentals as a direct link to the county's housing crisis. Furthermore, the use of vague language in the proposed ordinance does not provide the public with any assurance that the county has accurately defined a problem whereby this ordinance is the solution.

Should the county provide more factual data proving the claims made in the "Whereas" sections of the proposed ordinance, members of the Employers Council of Mendocino County will be open to reconsider our position. However, at this time, ECMC opposes this decision and will happily work with the county to better define problems associated with housing and reasonable regulation of Vacation Rentals.

Respectfully,

Employers Council of Mendocino County

John Mayfield  
Chairman

Jon Kennedy  
Executive Director