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September 11, 2017

Mendocino County Board of Supervisors
County Administration Center
501 Low Gap Road
Ukiah, CA 95482

(via hand-delivery on 9-12-17)

Re: File# 17-0815, Item 5e:
Extension of Moratorium on Establishment of Short Term/Vacation Rentals

Dear Supervisors Brown, McCowen, Croskey, Gjerde & Hamburg:

I write on behalf of members of the Inland Owners Property Rights & Fair Business Licensing Coalition, comprised of inland zone property owners that have been offering short term rentals at their homes over the past year or so, have applied for Business Licenses before August 1, 2017, and who have been dutifully paying county Transient Occupancy Taxes.

They are not opposed to the general intent of your plan to extend the existing moratorium but do wish to continue clarifying their concerns with regard to their unusual treatment under the existing Zoning Code. They do this only to insure that staff and Board be fully aware of a problem concerning the treatment of some property owners on inland private roads in the process of securing room and board licenses from the County.

Supervisor Brown aptly put her finger on the odd provision in Section 20.164.015 (L) at the August 1, 2017 Board of Supervisors hearing at which you first imposed a moratorium. That section would unduly encumber inland owners who lack "frontage on a publicly maintained road" to obtain a Use Permit at considerable burden, expense and energy, coupled with plenty of delay. For most, if not all, of the members of the Inland Coalition, this would serve to inequitably cripple their cottage-industry-like operations and present cost factors and procedures far in excess proportionally to their relatively meager rental businesses.

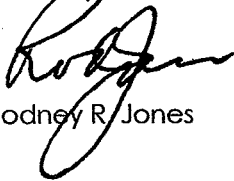
You will recall that at the Board of Supervisors, August 8, 2017 meeting, various representatives and supervisors spoke about the problematic treatment of regulating private non-publicly maintained roads. Interim Agricultural Commissioner Diane Curry asked whether it is wise policy for the County to get into legislating how particular private roads are used. She was joined in her comments by Mary Lynn Hunt of Planning and Building. Supervisors Brown and Croskey noted that such road use involves a civil law question in terms of easements and not something that should involve the County. Rather, for

existing private roads, issues should be left to landowners to resolve as a civil matter. At this meeting, the Board agreed not to require or include any private non-publicly maintained road limitations or conditions in obtaining Inland Zone Business Licenses for the businesses of marijuana cultivation.

We welcome the opportunity of providing our reasoning and analysis to the appropriate Planning and Building Services staff member and the Planning Commission, with the hopes that our opposition to Use Permits for inland private roads will be reflected (and perhaps adopted) in the staff report to be provided to you in the next few months while being of relief in a timely manner.

We also look forward to working together with the Board and staff on the Comprehensive Short Term Rental Ordinance.

Sincerely

A handwritten signature in black ink, appearing to read "Rodney R. Jones", written over the printed name.

Rodney R. Jones