

MBCA and CBD recommendations to San Bernardino County

C. Proposed Timeline and Study Content to include in Program 4

Program 4 should also include a detailed process and timeline for public outreach and engagement to ensure that the County has all appropriate evidence, data, and information prior to developing and adopting new STR policies and to ensure their successful implementation.

We recommend Program 4 meet the following timeframes and progress milestones:

Fall 2022:

Initiate a study to determine the current and projected impact of short-term rentals on the housing supply throughout the unincorporated county and on the motel/ hotel businesses in the Mountain and Desert regions. This study shall be a partnership between the County and the two distinct Mountain Region and Desert Region Advisory Committees. The Committees shall be formed and should include representatives from the following:

- Local Short-Term Rental Management Companies and STR Owners
- Local Business Owners, Realtors, Motel and Hotel Owners,
- Local Neighborhood Residents
- Local Housing, Homeless, Family and Foster Youth Service Providers
- Local Community and Environmental Groups
- Local School Districts and Community Colleges
- Local Military Bases and National Parks/Monuments
- Local Agencies such as Water Districts

By the end of 2022:

In coordination with the Committees, the County will draft and bring forward for consideration by the Board of Supervisors, an **interim cap** proposal for the total number of short-term rental permits to be in effect during the approximate year of study.

2023:

Conduct the studies described below. Continue to conduct a public planning process including outreach to community members and organizations via possible workshops, email, mail, and invitations for written and oral comments in order to receive information and feedback on STR impacts, further study suggestions, and proposed STR policies.

Use the process as an opportunity to form a holistic overview of these regions.

Fall of 2023:

Conclude study and identify the Advisory Committee's recommended strategies. Draft proposed caps, density limits and proposed short-term rental policy revisions for review by the Planning Commission and Board of Supervisors.

The language could include items such as: proposed limits on permits, density limits for specific neighborhoods, limits on the amount of permits a corporate entity and/or a natural person can hold, driver's license requirements (as required by

County policies for building permits) to identify responsible parties, as well as posting owner/responsible parties' contact information and permit expiration dates on the County website's map of STR permits, and clear administrative processes for Code compliance and sanctions for failure to follow County ordinances.

2024:

Initiate implementation of strategies for housing and programs to meet community needs based on the study's findings.

We recommend the studies include the following components:

1. A study of current long-term population and demographics. A survey of current housing availability, tenure, and vacancy rates. Analysis of how many dwelling units have changed from long to short-term rentals and resulting displacement.
2. Review of the impacts of the operation of STRs in the County, including an economic cost/benefit analysis of STRs on County operations and revenues.
3. Review of impacts of STRs on schools and how the availability of housing affects the operations and staff of school districts, military installations, national parks, national monuments, health facilities, and public agencies.
4. A survey of existing STR owners to determine who the responsible parties and owners are for the STRs to assure compliance with the regulations and confirm permit expiration dates and status.
5. Analysis of the County's enforcement policies concerning unauthorized grading and/or destruction of native plants and effects on wildlife.

D. Conclusion

The proposed revisions to Program 4 will help the County in recognizing and accounting for the impacts of STRs and to chart a path forward that considers the community, environment, and STR owners. Although to date we see serious legal deficiencies in the County's approach outlined in the June 6th Letter, we are proposing these revisions to Program 4 with the intent of addressing these issues collaboratively as partners. We look forward to working with the County on these issues.