



December 14, 2023

Re: Response to Technical Report
November 2023 Housing Element Program 4
Summary of Short-Term Rental Outreach and Study Findings
Prepared by PLACEWORKS and Granicus

To: County of San Bernardino
Mark Wardlaw, Land Use Services Director
Heidi Duron, Planning Director
Dawn Rowe, Chair Board of Supervisors
Via email: shorttermrental@lus.sbcounty.gov

Dear Reader,

The **Overall Conclusion** stated in the first sentence of the Technical Report presents an inaccurate and misleading summary of the information contained within the report. Further, the Technical Report fails to fulfill the purpose and requirements of the Program 4 Study upon which the acceptance of the Housing Element of the Countywide Plan by the State of California Department of Housing and Community Development was granted.

Our Response to the Technical Report that follows will show:

1. Why the report fails to satisfy Program 4. This begins with the aforementioned first sentence stating the report only studies availability of long-term, rental housing options and not the *housing supply throughout the unincorporated county and on the motel/hotel businesses*. The Annual Progress Reports (APRs) from 2018 through 2022 have not been properly revised. The definitive conclusion of the PlaceWorks summary belies the nuance within the Short Term Rental (STR) Data and Housing report prepared by Granicus.
2. Why the impacts of STRs on the overall availability of housing is a complex issue that requires a much more granular, and Community focused analysis that is NOT included within the Technical Report. Studies of Vehicle Miles Traveled (VMT) are required.

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3. How and where the deleterious impact of STRs on housing availability have been well-known for years. They have been acknowledged by County government officials and Planning officials; well documented within Local and National news reports; and explicitly identified in studies commissioned, accepted, and adopted by the County.
4. That housing displacement has occurred because of STRs, and the displacement continues as additional STR permits continue to be issued.
5. That the many references to the 'County' within the Report as having found, or not found, evidence, or made judgments, is not substantiated. This report has yet to be officially reviewed or adopted by the County and it is our opinion that it should NOT be accepted.
6. That the Study presented is insufficient and inadequate to evaluate the impact of STRs unless conducted on community / neighborhood scale. Given the vast distances and varying conditions within portions of the county a one-size-fits-all approach is inappropriate.
7. That the lack of the imposition of a cap, by neighborhood/community, on the issuance of STR permits has affected the price, and therefore the availability of housing within the unincorporated regions of the county.
8. That by adopting a moratorium on the issuance of STR permits, the preservation and availability of housing will be assured until such time as an appropriate Study of the effects of STRs is completed.
9. That the effect of an un-constrained number of 'Hotels' in the guise of STRs within residential neighborhoods is counterproductive and in opposition to the stated economic goals and aspirations of the County. There is an oversupply of recreational opportunities in the East Desert and an undersupply of needed housing. The goal of creating new high paying jobs is not being satisfied by low paying service-industry jobs serving STRs.
10. That there is a pressing need for the adoption of detailed, community level planning strategies for the unincorporated regions of the East Desert.
11. That there is a need to recognize the impacts of STRs on a Community level scale and to strive to have the economic benefits of STRs remain in the Community. The importance of returning the Transient Occupancy Tax revenue garnered from STRs back into the communities where they are located.

Our comments within this letter support our contention that the PlaceWorks/Granicus report as written must not be accepted by the County as satisfying the commitment to perform the Program 4 Study.

Towards that end we believe the following actions should be taken by the County:

1. Expand upon the Studies undertaken in the PlaceWorks / Granicus Study and issue a revised report that addresses the issues and concerns presented within our letter.
2. Institute a moratorium on the issuance of new and renewal STR permits.
3. Undertake detailed studies on the impact of STRs on Community level basis and utilize the results of such to impose a cap on STRs on a Neighborhood/Community level basis.
4. Perform a Cost-Benefit analysis of STRs on a Community level basis. The impact of STRs must be recognized and accounted for with appropriate re-investment of TOT directly into the Communities impacted.
5. Commit to employing Planning processes appropriate for the diverse Communities of the County. The existing structure of a single Planning Commission consisting of members from Districts that are unfamiliar with the diverse character of Communities requires revision. The repeal of Community Plan areas coupled with the rapid changeover of Land Use Services Staff has eliminated any institutional History associated with specific Communities.

We strongly urge the County to use this Study as an opportunity to re-confirm goals and institute policies that will appropriately address and solve the housing needs of the County.

As the CountyWide Vision states, 'It's Up To Us,' and we ask that the County act accordingly with conviction.

Thank you for your consideration,

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive, flowing style with a long, sweeping underline.

Steve Bardwell, President
MBCA