



Goals, groundwork of ordinance are a promising start

BUT MORE WORK IS NEEDED ON PROTECTIONS FOR NEIGHBORHOODS,
& AN ENFORCEMENT/COMPLIANCE SYSTEM THAT WILL BE EFFECTIVE

Who we are

- ▶ **Tom Coat**

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Member of Pacific Beach Planning Group vacation rental committee
13-year advocate for vacation rental regulations in San Diego

- ▶ **Scott Chipman**

Pacific Beach Planning Group member
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Long-time community advocate in Pacific Beach

- ▶ **Bob Semonsen**

Mission Beach resident
Long-time observer of California Coastal Commission

We support the goals of the ordinance, but want enhancements

- ▶ **Goal 1 – Provide high quality public service**

We believe a lack of effective enforcement and compliance service has led to a “toxic environment” surrounding vacation rentals. We propose a fairer, more effective solution.

- ▶ **Goal 2 – Achieve safe and livable neighborhoods**

We believe in a balance in which a limited number of vacation rentals operate, but where the residential character of our neighborhoods is protected. We propose distance separation.

- ▶ **Goal 3 – A prosperous City with opportunity in every community**

We believe all parts of San Diego should share in the economic benefits of vacation rentals. This type of vacation rental distribution will help diversity the economy, while protecting neighborhoods.

“Just enforce the code” won’t work. We need a lasting solution.

- ▶ For more than a decade, San Diego has tried to regulate vacation rentals. In 2018, an ordinance was passed. It was soon rescinded because of a citizens’ initiative.
- ▶ Continuing the “just enforce the code” approach, which didn’t work in 2018, won’t work in the future. As recent legal rulings show, the California Coastal Act poses serious concerns for this approach.
- ▶ The status quo of having no regulations and great uncertainty hurts all involved.
- ▶ A balance solution – a compromise – clearly is needed.

Cap on whole-home vacation rentals is the key to this compromise

- ▶ Unite Here!, Expedia and CM Campbell are to be commended for their work in coming up with a cap of .75% on whole-home rentals Citywide. We view this as a major breakthrough.
- ▶ San Diego is in an 18-year, and on-going, declared housing crisis.
- ▶ The proposed cap will, as the draft says, “help preserve residential housing.” That is a significant reason to support this ordinance.
- ▶ However, many details need to be developed in order to get a solution that is fair and effective.

All involved parties want effective, fair enforcement/compliance

- ▶ Enforcement/compliance efforts described in the draft are an improvement over the status quo, but fall far short of reaching the goal of providing “high quality public service.”
- ▶ The extensive monitoring of tiers, permits, a Good Neighbor policy and other factors demands a new system of enforcement/compliance that includes a high-tech, third-party partner that will work with dedicated Code Compliance officers.
- ▶ Vacation rentals today are a high-tech business. The City needs a high-tech partner to help it regulate the industry. Please see comments to CM Campbell’s staff for recommendations.

We need greater protections for our communities

- ▶ As written, the draft provides little protection against our tourist-attractive communities being overrun by a concentration of whole-home vacation rentals.
- ▶ Several times "**protecting the integrity of neighborhoods**" is mentioned. **This cannot be done without distance separations.** As currently written, all STRs could be concentrated in a few neighborhoods. If STR zones form within a neighborhood, the "integrity" of the neighborhood has not been protected. We need STRs to be distributed over the city not concentrated.
- ▶ A lottery removes any logic or intelligence to the process of determining which STR should receive a permit. There are better methods to use, including: Paying TOT by a specific date; no illegal construction, having code compliant off-street parking.

Summary: We want balance regulations, but need enhancements

- ▶ We can't continue the vacation rental status quo in San Diego.
- ▶ This draft represents a strong start toward finding a balanced solution that will stand up to legal challenges.
- ▶ As written, enforcement/compliance won't reach the goal listed. This area needs to be greatly enhanced, beginning with bringing in a high-tech, third party partner to help the City.
- ▶ As written, protections for tourist-attractive neighborhoods fail to meet the goals of providing safe and livable neighborhoods and diversifying the City's economy. Distance separation is needed.