



Interoffice Memo

DATE: February 3, 2022

PHONE: (909) 387-4110

FROM: HEIDI DURON, PLANNER DIRECTOR *HD*
Land Use Services Department

TO: HONORABLE PLANNING COMMISSION

SUBJECT: PROJECT NUMBER: PMISC-2020-00005; DEVELOPMENT CODE AMENDMENT TO ADD AND AMEND VARIOUS REGULATIONS TO PROVIDE CLARIFICATION AND UPDATES TO CHAPTER 84.28 RELATED TO SHORT-TERM RESIDENTIAL RENTALS (AGENDA ITEM #4)

Since the distribution of the staff report, Staff has received additional comments regarding the above-referenced project.

The correspondence is attached for your consideration.

From: [Jonathan Hume](#)
To: [Planning Commission Comments](#)
Subject: Comments -- STR Ordinance Update Redline
Date: Friday, January 28, 2022 6:08:29 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear SBCO Planning Commissioners,

Please accept our comments below regarding your consideration of the STR ordinance update redline revision, which you are scheduled to discuss at your meeting on Thursday, February 3, 2022.

Thanks very much for your service and your consideration.

Jonathan and Patty Hume

Jonathan and Patty Hume
420 El Bandito Way
29 Palms, CA 92277
310-863-7039

== COMMENTS ==

Occupancy Limits -- Use Square Footage NOT Bedroom Count

I agree that the current occupancy formula needs adjustment. It sometimes yields allowed guest numbers which are excessive. However, the proposed new formula is draconian and makes little sense. The new formula almost completely disregards habitable square footage, in favor of bedroom count. This would lead to results which are unacceptable and make little sense.

For example, under the proposed formula, an 800 square foot, 2bd house on a small 0.3 acre parcel, would have an identical number of allowed guests as a 2300 square foot, 2bd house on a large 2.5 acre parcel. Treating these two very different "2 bedroom" STRs as if they should have identical occupancy would obviously be absurd.

Instead I suggest the following simple approach:

- STR less than 800 square feet: max of 4 occupants
- STR 800-1200 square feet: max of 6 occupants
- STR 1200-1600 square feet: max of 8 occupants

- STR 1600-2400 square feet: max of 10 occupants
- STR 2400-3000 square feet: max of 12 occupants
- STR greater than 3000 square feet: max of 14 occupants
- For all above, add 2 occupants for parcels 2 acres or greater.

Moreover, using the simple formula above, there is no need for the proposed new numbers of children under 12 or daytime visitors. Both of these proposed new features are unnecessary, and in actual practice would be challenging for both STR hosts and Code Enforcement itself to enforce.

STR of ADUs -- Preserve Existing Policy

The redline draft proposes changing the situation for ADUs. Currently, both a house and ADU can have each have STR permits when parcel size is 2 acres or larger. In fact, my wife and I have exactly this situation -- with zero negative impact on our neighbors. As you can imagine, it took us considerable expense and over a year (!) to legally permit our guest house as an ADU and obtain an STR permit for it.

At a bare minimum, people like us -- good hosts who have played by all the rules -- who have existing STR permits for both house and ADU, should be grandfathered in with ADU STR as an existing nonconforming use. There aren't many in our situation but we need to count for something.

In the larger picture, given the long term shortfall of housing versus job creation, SBCO should be doing everything it can to incentivize residential construction of all kinds. If letting people STR ADUs is what it takes to get people to build more ADUs, that should be welcomed and encouraged. Once built, ADUs last for many decades. STR is not a permanent use. Eventually ADUs will serve a variety of housing needs including LTR. But without sufficient incentive ADUs won't be built at all. This would be to the long term detriment of the community.

This is why my strong preference would be to preserve the existing ADU treatment and ordinance verbiage just as it is.

Minimum Stay -- Preserve Existing Policy

The redline draft proposes establishing a two-night minimum STR length of stay. Whereas the current ordinance does not specify any minimum. So Code Enforcement is effectively proposing to eliminate one-night stays.

The county's motivation for this change is unclear. Is the idea that this might reduce parties? Is it to reduce traffic, e.g. housekeepers?

Whatever the motive, changing to a two-night minimum would be detrimental to guests, STR-related workers, and the surrounding community.

Many guests are only able to stay a single night. Often they are passing through on a

road trip where the hi desert is only one stop, not a destination in itself. Many of our best guests stay just one night. Many stay a single night on their first visit to the area, then return for a longer stay. The county ought to be encouraging these folks to stay a single night, not discourage them and force them to stay elsewhere.

Single night stays account for a significant proportion of the work for our housekeepers. So if one-night stays were eliminated, our housekeepers would get substantially fewer work hours, making less money to circulate into the surrounding community where they live.

For these reasons -- my strong suggestion would be to strike the proposed two-night minimum stay requirement from the redline draft.

From: [Barbara Finlayson-Pitts](#)
To: [Planning Commission Comments](#)
Cc: [Dave Holden](#); [Pete](#); [Supervisor Rowe](#); [Cozad, Claire](#); [Harrington, Danielle](#)
Subject: STR draft regulations
Date: Friday, January 28, 2022 8:09:54 PM
Attachments: [Final Letter Petition Nov4 2021 No signatures.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planning Commissioners:

We are writing to present a petition from approximately 80 Fawnskin residents regarding the STR draft regulations. We presented this to Supervisor Rowe and her staff, Claire Cozad and Danielle Harrington, in November. They were sympathetic to the STR problems and indicated we should submit to the Planning Commission and attend the Planning Commission meeting where this will be considered. We attach the petition (without the pages of signatures for privacy but can provide those, which Supervisor Rowe does have). Also included in the attachment is a summary of STR regulations in various communities similar to Big Bear. A brief perusal reveals the San Bernardino county rules are the most lax, even more that those for the Clty of Big Bear lake.

We hope that you will take the suggestions in the petition to heart and include them in the regulations that you forward to the Board of Supervisors.

Many thanks for your consideration,

Barbara Finlayson-Pitts, Peter Tennyson and Dave Holden

November 2, 2021

Supervisor Dawn Rowe
3rd District
County of San Bernardino
385N. Arrowhead Ave
San Bernardino, CA 92415

Dear Supervisor Rowe:

We are writing to you as representatives of a large group of Fawnskin residents who are suffering from the influx of short-term rentals (STR). They have asked us to present you a petition requesting specific changes in the county regulations for STR. Signature pages from these residents are attached.

Of immediate and significant concern is a relatively new phenomenon: many of the short-term rentals are now being purchased for the sole purpose of being a non-owner occupied STR business. These are essentially unsupervised small hotels which are inconsistent with residential neighborhoods in which they are located.

We have carried out a survey of the STR restrictions in a number of municipalities and counties, and a summary is attached. You will see from this that it is increasingly the case that STR are completely banned in residential neighborhoods, including in resort areas such as ours. For example:

- Mammoth Lakes does not allow STR in residential areas.
- Palm Desert bans STR in neighborhoods zoned R-1 and R-2 unless the host is on-site during the stay.
- La Quinta only allows STR in areas zoned commercial or tourist
- Rancho Mirage is phasing out STR in neighborhoods without homeowner's associations.

At a bare minimum, limits are being placed on the number of rental days allowed and/or the density of STR. For example:

- Telluride, CO restricts STR to a total of three short-term rentals annually for a cumulative number of rental days not to exceed 29.
- Steamboat Springs, CO allows only 2 rentals per year for a total of 30 days.
- Douglas County, NV puts a limit on the total number of STRs allowed, with 15% maximum STR in single family neighborhoods and no more than 20% in "tourist" districts.

Based on these examples, a ban or significant tightening of the regulations on STR in the county areas of Big Bear Valley that are zoned as residential (RS and RL) neighborhoods, including Fawnskin, is certainly justified. For example, limits on the number of rental days and guest stays allowed annually would be consistent with restrictions in many resort areas.

Such limits would be a significant step towards protecting our residential neighborhoods. In addition, it would support local hotels, motels and commercial cabin rentals who are subject to many more regulations than STR, and are losing business to these private small hotels. It would also help with the housing issue for local workers, which has become a crisis; they cannot find local housing, requiring them to commute from down the hill. This is not practical for the wages they are paid, which is contributing significantly to the already difficult time our local businesses are having in hiring staff. We attach a recent report on the impacts of STR that provides data on these issues in a number of localities around the U.S.

In addition to the limits on the number of allowed rental days and guest stays, changes in county rules would also go a long way to easing the situation. These include:

1. Currently, when a STR permit is granted, neighbors are given 10 calendar days to appeal. This is only after the permit has been granted. This is backwards, the appeal period should come before granting the permit.
2. Permits should be limited to one per family, no business entities allowed.
3. A sign posted in a prominent place on the exterior of the building that gives the phone number of a local contact who is available on a 24 hour basis and who can respond within 30 minutes should be required. This should also show the maximum number of occupants and the maximum number of vehicles. This would be consistent with the rules in the city of Big Bear Lake. In a number of cases there is no sign and no local contact, the owners are a hundred miles or more away and not able to respond.
4. There should be a requirement for face-to-face check ins at the property with review of the rules and regulations. This is a requirement in the city of Big Bear Lake.
5. The renter must sign a copy of the county "Good Neighbor Policy" prior to or during check-in, and these signed copies must be available to the county upon request.
6. Two or more complaints with one rental group during a single rental period for behavior that disturbs the neighborhood should require eviction of the renters.
7. At least one additional county enforcement staff person should be available to respond to code violations in real time. This should include someone on duty in the evenings when the most problems tend to occur.

We look forward to discussing these with you in more detail.

Many thanks for your time and consideration.

Respectfully,



Barbara J. Finlayson-Pitts, Ph.D.
Professor



Peter Tennyson
Corporate Attorney
(retired)



David Holden
Film & TV Composer

SUMMARY OF STR RULES IN VARIOUS LOCALITIES

Jurisdiction	What defines STR? (# days/yr)	Limits	Allow Multiple Licenses?	Signs Outside?	Permit in Ads?	Local contact?	Check in?	Duration of Permit?	Other	Notes
SB County (now)	30 or less	silent	silent	No	No	Yes (1 hour)	no	2 years		Transferable to new owner
City of Big Bear Lake	28 or less	silent	max 2	yes	yes	Yes (30 min)	yes	annual		Renters must sign Good Neighbor agreement on in person check-in with agent
Mammoth Lakes	Under 30	Not in residential zones	silent	yes	Yes in all ads	Yes (1 hour)	silent	Not specified	Maximum 10 guests	Resort zone exempt from residential ban (is about half the town)
Palm Springs	28 or less	36 guest stays/year	no	silent	yes	Yes (30 min)	silent	annual	Must certify no CCR; must attend annual class	Homesharing exempt if owner resides at same time
Palm Desert	27 or less	Not in residential unless HOA allows; 2	silent	Not allowed	yes	Yes (30 min)	yes	annual	Fine operator for slow response	Timeshare developments exempt

		night minimum.								
Cathedral City	30 or less	Only if CCRs allow; application must include HOA certificate; not allowed in units with affordability covenant	silent	silent	Yes; must submit copy of listing monthly	Yes (30 minutes)	Yes but may be by video	annual	3 night minimum	Phasing out all STR by 2023 except in areas with CCRs that allow; home share exempt if owner on site
Indio	Less than 30	Not stated	silent	silent	yes	Yes 45 minutes in person; 15 minutes by phone	silent	annual		Renter must be individual; city posts a map of permits
La Quinta	Less than 30	Only in areas zoned tourist or commercial	silent	Allowed—no content	Hosting platform must verify	Yes 30 minutes	silent	annual		
Rancho Mirage	27 or less	Only if CCRs allow	silent	prohibited	Yes; must monthly show listing	Yes 45 minutes	Yes	annual		
Indian Wells	Under 30	7 night minimum;	No “multipl	prohibited	yes	Yes 1 hour	silent	annual		Timeshare projects exempt;

		28/29 minimum if includes February	e rentals”							special rules for tennis tournament
South L. Tahoe	Under 30	No new units; phase out existing ion residential	No	Yes	Yes until expires	Yes	Silent	Annual (tourist zone only) no renewal if three citations	Requires paved on site parking	Exemption allowed if owner lives on site; measure does not apply in “tourist core”
El Dorado county (Ca)	Under 30		silent	yes	silent	Yes 1 hour	silent	annual	2 per bedroom	
Douglas county (NV)	28 or less	Maximum of 600 units in Tahoe Township; none in other townships; no more than 15% in single family and no more than 20% in “tourist” districts	One permit per family; no business entities	silent	yes	Yes 30 minutes; contact person must report compliance within 1 hour	silent	annual	Must have public hearing and licensed manager for occupancy by more than 10	Renter must be 25+ Local contact (including owner) must complete a training course; county publishes map of STR Time shares exempt

Mono County	Under 30	Max at 3% of units ; none in specified June Lake tracts; 3% in others	No— one per person;	yes	Yes— in heading	Yes—not specified; owner must manage or hire licensed realtor	silent	Annual; if revoked must wait 2 years	10 people max—2 per br	Snow removal required; entities must disclose all owners; permit requires hearing at planning dept
Boulder	Under 30	no license if deed restricted; primary dwelling license restricted to max 20 days per month and less than 6 months total	No-one per person	yes	yes	Yes 1 hour	silent	2 year	Max 8 guests	Vacation rental license if rented more than 60 days is stricter— not in residential subdivision
Telluride	Under 30 or less	3 rentals (29 day total)/year in residential zones; max 400 permits	silent	silent	silent	yes	silent	annual		Moratorium in place because of “land rush” of 40 applications/month
Steamboat Springs	Under 30 (separate)	Only 2 rentals per year; total 30 days	silent	silent	yes	yes	silent	annual	1 guest per 200 sq feet	Moratorium on new permits in effect while issues studied

	zoning category vacation homes has 29 day rules and no permits)									
Santa Fe	Under 30	Max 1000 units in residential; (land use sets max number); one rental in any 7 day period Except 11/15 to 1/15; no adjoining properties can qualify; must be 50 feet apart; none if CCRs ban	No –one license per natural person (owner can be entity but permit holder must be person0)	silent	yes	Yes (1 hour response)	silent	annual	10 pm quiet hour	Resort facilities with sp use permit exempt; condo projects exempt from “adjoining’ rule but no more than 25% of units can have permit; city hires Host compliance to monitor AirBnB etc.

NOTE: All ordinances restricted parking to on site and not in street and all ordinances included quiet times usually from 10 pm to 7 or 8 am. Most ordinances state no devices can be audible outside premise; all require compliance with local noise ordinances. All except San Bernardino County state permit is void on a transfer. Placer County (North Lake Tahoe) has a moratorium on new permits while studying changes.

From: [Valeree Woodard](#)
To: [Planning Commission Comments](#)
Subject: Agenda item 4 STR revisions
Date: Saturday, January 29, 2022 7:31:56 PM

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To all planning commissioners,

I hope you will adopt all your suggested revisions, more regulations are needed.

As full time resident of Joshua Tree I am also concerned about STR density. My residential neighborhood is now a revolving door of visitors, I feel like I live on Hotel Row. Out of the closest 15 houses 12 are STRs.

We get constant trespassing, because our properties border the National Park. We moved here 20 years ago for a quieter life and beautiful night skies. Now we get parties and bright string lights on all night.

Our desert needs saving!

Thank you, Valeree Woodard
769-821-5711

From: alex@alexbykov.com
To: [Planning Commission Comments](#)
Subject: Opposition to STR rugulation changes
Date: Saturday, January 29, 2022 2:51:04 AM

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Hi I reviewed the proposal to change the STR regulations for SBC. If I understand it correctly, there would be heavy limitations on occupancy based solely on bedrooms, and ignore lofts and living rooms. Additionally limiting bedrooms to 2 occupants only regardless of size.

This is extremely unfair. While I understand limitations by parking and by overall space (I don't think its safe or appropriate to stuff as many humans as possible in a room), it is fair to use lofts and living rooms as sleeping areas if sufficient space is present and proper sleeping equipment (bed, couch, futon, etc.) is used.

I have on many occasions gone on ski and hiking trips with my family where we had people sleep on coaches, living room futons, etc. The rental was primarily used as a resting spot so we could enjoy the outdoor activities of the location. It would be very unfair and detrimental to STR owners to apply such heavy restrictions.

Lastly consider how this could impact the designs/redesigns of properties. It would force those who want to thrive under the new rules to create many tiny bedrooms on a property to increase the limit, resulting in horribly designed homes that later would negatively impact resale.

I believe the current limitations are sufficient. If anything I would find way to prevent large well funded companies/groups from buying up properties. As these rules changes would likely impact more low value properties, owned by families just trying to make a small profit to help support themselves.

Thank you for your time,



Alex Bykov
alex@alexbykov.com



From: [Ben Loescher](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#)
Subject: Proposed Revisions to the STR Ordinance
Date: Saturday, January 29, 2022 5:42:47 PM

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Dear Commissioners,

Since San Bernardino County adopted its first Short Term Rental Ordinance in 2019, we have seen an explosion in the number of owner occupied and long term rental homes around our home in Pioneertown. Our neighbors have been bought out and replaced with commercial hospitality operations; our friends have lost their homes when their landlords sold to absentee STR investors. Individuals who used to contribute to the life of our communities and work in our businesses have been pushed out, and replaced with STR operators who with few exceptions have taken more from our basin than they have given back in jobs or civic engagement.

This ordinance won't repair the damage that investor owned Short Term Rentals have done to our communities and workforce, but it is at least a start. By putting limits on the quantity of STRs that a single entity or individual may own, the pace of housing loss should slow. While tourism is critical to our economy, there will be no sustainable tourism industry here when current land use policies prevent workers and families from living in our communities.

San Bernardino County needs to enact this ordinance and work urgently to develop policies that allow tourism serving accomodation to be established where it belongs: in developed, commercially zoned areas with appropriate infrastructure and access.

K. Ben Loescher, Architect
Pioneertown

From: [Alex Segrest](#)
To: [Planning Commission Comments](#)
Subject: STR comment
Date: Saturday, January 29, 2022 7:44:22 AM

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I live and work in Morongo Valley. I have ONE STR on my property that allows me to pay my mortgage. My STR is a renovated, travel trailer that sleeps 2 people. It has a real bathroom that is plumbed to a real septic tank (holding tank removed). It is plumbed so water is direct (no holding tank used). A house sized hot water tank was installed on a concrete pad by a professional plumber. I am more than happy to have it inspected.

For the county to consider this illegal or non compliant is unfair.

Alex

From: [Andrea Massey](#)
To: [Planning Commission Comments](#)
Subject: Comments on proposed changes to STR Ordinance
Date: Sunday, January 30, 2022 12:28:56 PM

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Hello,

As a person who rents out part of my home on AirBnb, the new minimum stay requirement noted in section § 84.28.070, Conditions of Operation, part B, would be a detriment to me as a host. I ask the department to reconsider and remove the requirement. Many guests come from LA or surrounding areas in Southern California, and like to enjoy one night up in the mountains after a day of skiing, hiking, or enjoying SkyPark or other areas on the mountain. I wouldn't want to lose those potential guests due to a 2-night requirement. It would negatively affect the income I'm able to receive from my permitted STR. Thank you for considering my comments.

Best,
Andrea Massey
STR host in Running Springs

From: [Ken Leek](#)
To: [Planning Commission Comments](#)
Subject: Input on proposed STR ordinances in Joshua Tree
Date: Sunday, January 30, 2022 1:58:24 PM

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Hello, my name is Ken Leek and I own one STR in the Friendly Hills area of Joshua Tree. I do everything myself at my property and I live in 29 Palms. I applaud most all of the proposed ordinances except one and that is the two night minimum stay. Without question, the one night stay guests I have hosted are the best guests I could ask for in regards to being quiet and the occupancy. Almost all of my one night guests are couples who spend most of their time in the park and at local eateries. They are the ideal guests who come here specifically for the park. The guests who present the most problems in terms of noise are the ones who come in large groups (5 or more) and stay multiple days. These are the guests who have little desire to explore the park. These are the guests who tend to never even leave the house. If anyone is going to be a nuisance to neighbors it's going to be the larger group multiple night stays. My business is based on people who want to go to the park and have a quiet and serene place to relax and rejuvenate before the next day. For couples who are serious about park exploration, one night stays are ideal. They get here early, explore the park, come home to eat, shower, relax, and sleep and then hit up the park again before going home.

Although I have a three bedroom home, I only allow four guests maximum. The vast majority of my guests during the week are couples and I get lots of one night stays during that time. Please don't punish us small fish who are responsible, live in town, and voluntarily limit our guest count out of respect for our neighbors and the neighborhood. I rely on this income to pay for my mother's Alzheimer's care in 29 Palms. I'm not out to take over neighborhoods, buy homes from under renters, or leave my property in the hands of someone else.

I could understand making this policy if there was a study that could show one night guests are problematic guests but this seems to be based in the fear that someone will book a party. If that's the case, then make the two night minimum on Friday and Saturday only. Please allow one night bookings Sunday through Thursday. Us small fish need those guests.

Here is a link to my STR.
airbnb.com/h/houseinthehills-joshuatree

[Sent from Yahoo Mail on Android](#)

From: [Tiff Gmail](#)
To: [Planning Commission Comments](#)
Subject: Proposed changes
Date: Sunday, January 30, 2022 8:31:47 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello & thank you for taking the time to read my comments. I am an owner of a STR I. Joshua tree. We chose the homes because we love relaxing in the area and we love to share that with others. We employ a lot of local people and also recommend many local shops. We put local products in our homes which encourages people to buy local and there is no doubt how vacation homes help local shops.

I did want to address something specifically. We have spent a huge amount of money to convert a (totally dilapidated) cabin on our property to an ADU expecting to rent both out at the same group. I would greatly appreciate the chance that the permit for the house and ADU be issues together. I only Plan on renting to one group at a time but both units to that group (to make a 3 bedroom home Total). As it is not done yet due to long delays with permits, we do not have a permit still and this change would be at significant cost to us and truly not fair since we had started long before this was proposed and have no control over the long delays.

Again, appreciate your time and we love to support local!

Thank you-

Tiffany Katuls

From: [ptennyson](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#); [Supervisor Rutherford](#)
Subject: Short Term Rentals
Date: Sunday, January 30, 2022 1:37:20 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Ladies and gentlemen:

I am aware of the draft, proposed for discussion by the Planning Commission on February 3, of a revision to the County's short-term rental ordinance. I am of course not certain I have seen the latest version and I apologize if a later draft has covered some of my comments. I applaud the interest in improving the ordinance, which I hope reflects recognition of the explosive growth in short term rentals in certain areas of the County. In the Big Bear valley, particularly in Fawnskin, this rapid increase has replaced homes available for long term rental, or owner use, with what are in effect mini-hotels.

Some of these owners, including one close to me, have thus far been mindful of the need of others for peace and quiet, absence of trash and non-abuse of parking. Others, however, have routinely exceeded occupancy limits, been slow to respond to complaints of noise and outdoor fires (or not responsive at all), have ignored occupancy limits and limits on the number of vehicles, and otherwise abused the privilege of using their houses as businesses. Accordingly I believe you need to improve the ordinance further, and add measures designed to protect neighbors. I have followed with interest the problems in the city of Big Bear Lake, and have also extensively reviewed ordinances in other communities, mostly throughout the west. While the proposed revisions are helpful, I offer a few suggestions:

- The prohibition of a "business entity" holding an STR permit (when the proposed definition makes individuals, LLC's and LLPs or trusts with two permits be classified as "business entities" as well) is very helpful. The application suggested requires the applicant to certify they are not a business entity—it could also be more specific and add a requirement that the applicant disclose whether they or their immediate family own or operate other STRs in the County. As drafted, the requirement may lead individuals to falsely certify they are not a "business entity" and then later, if a violation in the application is asserted, plead ignorance. If an individual owns multiple STR units, he or she is clearly engaged in a business, and the whole idea of allowing STRs in the first place should be to assist individual owners. After all, single family zoning should mean something. I respectfully suggest that an individual or family should be able to own no more than two STR units and that the draft I have seen retain this restriction when enacted. . Owners of multiple units are more likely to ignore their neighbors, since they are more focused on a business and not on the peace and quiet of the area, and can be cavalier with units that are only investments. Owners of multiple STRs also in effect compete with established hotels and cabin properties, benefitting from laxer requirements than their business competitors.

- The definition of notice to surrounding property owners by reference to a code section that limits this to owners within 300 feet in most cases is a mistake. Please define surrounding property owners as all owners whose properties are within 1000 feet of the boundaries of the parcel proposed for STR use. That would be more in keeping with the way noise carries, especially in canyons, and the inconvenience of traffic. In the case of an STR near my house at which the renters routinely park in the street I must use for access, the proposed definition would keep me from receiving notices.
- The statement that a business entity may manage multiple properties as an agent would be improved, I suggest, by adding the words "provided each such property is the subject of a valid permit held by an unrelated individual."
- The proposed requirement to give notice at the time of an application is helpful; please consider requiring such notice when a renewal application is filed. This would allow neighbors to bring to the attention of the permitting authority instances of past violations. Please make it explicit that in considering the renewal permit past complaints must be considered. In particular, if suggestions that have been made about restricting the density of permits are accepted, denying renewal to properties with a history of complaints would allow more responsible owners to hold permits.
- Please add a provision clearly requiring prompt notice to the permitting authority and the affected neighbors if the owner designates or appoints a new agent. Such a requirement would be of great help in reporting problems. Neighbors can be frustrated or inconvenienced by calling the person identified in the notice a permit was granted, only to find the agent is no longer employed. As you can imagine, an agent who has been replaced and is called late at night is not eager to help in contacting the new agent, even if the "replaced" agent knows the new contact. Failure to provide notice of a new agent should be a violation calling for a monetary penalty and a consideration in suspending or failing to renew a permit.
- The requirement for the agent to be able to reach the property within one hour is too lenient. Half an hour, or even 45 minutes, would be of help when there is a noisy party going on at 2 in the morning. Please think of how a neighbor feels late at night when there is over an hour before there is any response to a complaint about excessive noise and partying. Perhaps there should also be a requirement that an agent who represents multiple properties have sufficient staff to satisfy this rule, at least during weekend and holiday periods, which is when most problems arise. Provisions to penalize agents who do not respond promptly to the complaining party would be useful.
- "Renter" is defined as "an individual..." is this meant to prohibit renting to business entities such a corporations? If so that is desirable and should be specific. It would be most helpful if every rental had an individual who is responsible.
- The proposed revised ordinance does not seem to include a reference to the provisions for monetary penalties to be imposed for violation of occupancy limits, parking rules or excessive noise which goes uncorrected. I realize there are such provisions provided elsewhere in the County Code but there should be an explicit reference to them. I suggest that not only should penalties for subsequent violations increase as noted in 11.0201 et seq, but that several violations should require (not just "may be the basis for") a suspension or revocation. The County can use the revenues from fines or monetary penalties to add enforcement resources, and owners who flaunt the rules of operation should be penalized.
- In particular, there should be express penalties for prohibited uses of properties. Parties, receptions, photo shoots and the like impose extra burdens on the neighbors and need to be strongly discouraged.
- Please consider requiring an external sign with occupancy limits, vehicle limits and a

number to call with complaints. It is burdensome on neighbors to keep the letter notifying them of an STR permit close to hand, especially in view of the increasing number of units that are being permitted. This burden will be less if you require notice to neighbors of renewals, but an external sign would notify all, not just near neighbors.

- There are currently at least four STR units near our house. Two of these were converted from owner use recently after a sale. Please consider a limitation on the number of STRs in a given area. I suggest that no more than 15% of the units in a particular tract or township can be permitted, or that permits may not be issued or renewed if there are already more than two STR permits for properties within a certain distance, say 1000 feet. You could enforce this by requiring the applicant to provide a map, showing all other STR properties in the vicinity, with denial, suspension, fines or revocation as the penalty for a false certification.
- The draft I saw suggests removing the current provision that permits for all properties of an owner of multiple properties can be revoked because of violations at one or more properties. It would be very helpful to retain language that provides that all permits held by an owner are suspended or revoked because of violations. The owner has, by allowing violations at one or more properties, demonstrated a pattern of irresponsible behavior that justifies not allowing further STR activity. It is of course preferable to limit ownership of multiple STR properties.
- All advertising, not just advertising on hosting platforms, should be required to include a permit number [compare 84.28.070(f) (2) with 84.28.110(c)]
- There are no references to pools. I know there are more hot tubs than pools, but there should be explicit rules saying pools must be enclosed, and that spas, hot tubs and pools may not be used after, say, 10 pm or before 7 am. It is very common for spas, pools and hot tubs to produce excessive noise, particularly if the users are drinking. It should not be too much of an inconvenience to limit the hours during which such noise-producing activities are allowed.
- Can there be an explicit reference to requiring STR properties to comply with the “dark skies” ordinance? Renters are less likely to consider turning off exterior lights, and requiring properties that are essentially commercial to replace fixtures that do not comply with the ordinance would promote enjoyment of the nighttime environment. For example, a recent permit was issued to an owner who installed new fixtures which violated both the previous and the new ordinance. The inspector should have realized the open LED fixtures (which can be seen from over two miles away) were new, but apparently overlooked the requirement that new/replacement fixtures comply. An explicit reference would make the inspectors more mindful.
- Please consider a "bounty hunter" provision to reward owners who report unlicensed/unpermitted STR operations, and perhaps other violations.

Thank you for the effort which has produced the current drafts. I hope to be able to attend your meeting and would be glad to discuss any of these ideas with you or your staff.

If after your discussion the issues remain complex and require further study, please recommend to the Board of Supervisors a moratorium such as has been put in place in many other jurisdictions. Our neighborhoods are being damaged if not destroyed and delay is not acceptable.

Peter J Tennyson
965 Deer Trail Lane, Fawnskin

714 390 6237

From: [Barbara Finlayson-Pitts](#)
To: [Planning Commission Comments](#)
Subject: STR draft regulations comment
Date: Sunday, January 30, 2022 3:21:36 PM
Attachments: [My Submission to Planning Commission Jan30 2022.docx](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Friends:

Thank you for the opportunity to comment on the draft STR regulations. They are an improvement from the current situation, but unfortunately do not go nearly far enough. Fawnskin is a quiet community that people choose to live in for that reason (it was described in an LA Times article some years ago as the “bucolic hamlet of Fawnskin”). The explosion of virtually unregulated STRs is decimating this description.

Allow me to first emphasize this is not a NIMBY. I purchased in 2017 one of the last large remaining plots of land (30 acres) in Fawnskin and donated 29 acres to the San Bernardino Land Trust to be preserved in perpetuity. I had steps constructed at my own expense across my own property to provide access for the public to the 29 acres and the National Forest beyond, so that people could fully enjoy this wonderful area.

With regard to STRs in Fawnskin, a significant fraction is no longer “rent your cabin occasionally” but rather, full-time rentals run as business investments, in some cases basically unsupervised small hotels in residential neighborhoods. However, they are owned by individuals or trusts, so that they do not fall under ownership as a “business entity” as defined in the draft regulations, despite the fact that this is what they are in reality.

Let me give you one case that exemplifies many of the issues. This is a large STR in Fawnskin with an outdoor pool, jacuzzi, gym room and pool table room, not exactly a mountain cabin for small groups. The owner, who lives on the east coast, bought it as an investment and has it managed by someone in Santa Monica who is not within the hour response time in the current regulations (already a violation). There have been so many violations with this mini-hotel that it would take more time than you have if I listed them, but many of them would not be addressed in the revised regulations. Specifically:

The signage regarding the contact information, occupancy and parking limits etc. should be posted outside the building, not (or in addition to) inside. The “surrounding” property owners who are notified regarding permit issuance only includes those within 300 ft of the property. Fawnskin is built around a canyon and sound carries much further than this. With the above-mentioned property, people much further away from the house are subjected to disturbances from the property. However, when they come up to see who to contact, there is no information available.

Face-to-face check-ins at the property are a must. Let me give one example of why this is important. A few weeks ago, a group of 50 UCLA students (this is not a typo, it was 50!) planned on renting this house. One student made the reservation and was supposedly informed by the manager in Santa Monica of the rules, including occupancy. We only learned

of this reservation because a corporate bus company they had chartered realized they could not get a bus that large up the street and called a resident near the main highway to ask if they could park there and let 50 students out to walk to the rental. We were able to contact the manager to ask if he was aware of this, and the reservation was cancelled. However, if it were not for the bus company call, this would have been a disaster for all of us who live nearby.

If renters know there is a face-to-face check-in AND there is a local person keeping tabs on things, it would greatly minimize such nonsense.

The renter should be required to sign the county “good neighbor” policy, not just be given a copy.

For snow removal, the contact for a person who does this is not sufficient. We often get amounts of snow that a vehicle can drive on initially. However, this forms ice and then they are stuck, and when they do get out, they park on the street. There should be a requirement that the owner arranges for snow removal consistently, just as they have to take care of trash.

It is not clear in the draft regulations whether an STR permit will be issued before or after giving the surrounding property owners an opportunity to object. Currently it is after, which is closing the barn door after the horse has escaped.

Note that many of these regulations are required for STR in the City of Big Bear Lake (BBL). Why should the county be less restrictive than our close neighbor, BBL? In fact, some of the property managers have told us that owners specifically buy properties in the county to run as full-time STRs/businesses because the rules are lax and not enforced.

Attached is a table summarizing STR rules in various resort communities around the U.S., including California. Note that Mammoth Lakes, which surely is comparable to Big Bear, does not allow any STR in residential neighborhoods. Telluride, CO, restricts them to a total of 29 rental days with 3 separate groups maximum.

My own strong recommendation is that like Mammoth Lakes, no STRs be allowed in what are totally residential areas like Fawnskin, unless the owner is local and can monitor the rental in real time. As an alternative, limiting the number of rental days and guest groups as Telluride does would be a significant improvement. At a minimum, including items # 1-5 above in the regulations is essential.

Thank you for your consideration.

Submission to Planning Commission

Barbara J. Finlayson-Pitts

January 30, 2022

Thank you for the opportunity to comment on the draft STR regulations. They are an improvement from the current situation, but unfortunately do not go nearly far enough. Fawnskin is a quiet community that people choose to live in for that reason (it was described in an LA Times article some years ago as the “bucolic hamlet of Fawnskin”). The explosion of virtually unregulated STRs is decimating this description.

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2. Face-to-face check-ins at the property are a must. Let me give one example of why this is important. A few weeks ago, a group of 50 UCLA students (this is not a typo, it was 50!) planned on renting this house. One student made the reservation and was supposedly informed by the manager in Santa Monica of the rules, including occupancy. We only learned of this reservation because a corporate bus company they had chartered realized they could not get a bus that large up the street and called a resident near the main highway to ask if they could park there and let 50 students out to walk to the rental. We were able to contact the manager to ask if he was aware of this, and the reservation was

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3. The renter should be required to sign the county “good neighbor” policy, not just be given a copy.
4. For snow removal, the contact for a person who does this is not sufficient. We often get amounts of snow that a vehicle can drive on initially. However, this forms ice and then they are stuck, and when they do get out, they park on the street. There should be a requirement that the owner arranges for snow removal consistently, just as they have to take care of trash.
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Thank you for your consideration.

Jurisdiction	What defines a STR? (# days/yr)	Limits	Allow Multiple Licenses?	Signs Outside?	Permit in Ads?	Local contact?	Check in?	Duration of Permit?	Other	Notes
SB County (now)	30 or less	silent	silent	No	No	Yes (1 hour)	no	2 years		Transferable to new owner
City of Big Bear Lake	28 or less	silent	max 2	yes	yes	Yes (30 min)	yes	annual		Renters must sign Good Neighbor agreement on in person check-in with agent
Mammoth Lakes	Under 30	Not in residential zones	silent	yes	Yes in all ads	Yes (1 hour)	silent	Not specified	Maximum 10 guests	Resort zone exempt from residential ban (is about half the town)
Palm Springs	28 or less	36 guest stays/year	no	silent	yes	Yes (30 min)	silent	annual	Must certify no CCR; must attend annual class	Homesharing exempt if owner resides at same time
Palm Desert	27 or less	Not in residential unless HOA allows; 2 night minimum.	silent	Not allowed	yes	Yes (30 min)	yes	annual	Fine operator for slow response	Timeshare developments exempt

Cathedral City	30 or less	Only if CCRs allow; application must include HOA certificate; not allowed in units with affordability covenant	silent	silent	Yes; must submit copy of listing monthly	Yes (30 minutes)	Yes but may be by video	annual	3 night minimum	Phasing out all STR by 2023 except in areas with CCRs that allow; home share exempt if owner on site
Indio	Less than 30	Not stated	silent	silent	yes	Yes 45 minutes in person; 15 minutes by phone	silent	annual		Renter must be individual; city posts a map of permits
La Quinta	Less than 30	Only in areas zoned tourist or commercial	silent	Allowed—no content	Hosting platform must verify	Yes 30 minutes	silent	annual		
Rancho Mirage	27 or less	Only if CCRs allow	silent	prohibited	Yes; must monthly show listing	Yes 45 minutes	Yes	annual		
Indian Wells	Under 30	7 night minimum; 28/29 minimum	No “multiple rentals”	prohibited	yes	Yes 1 hour	silent	annual		Timeshare projects exempt; special rules for

		if includes February								tennis tournament
South L. Tahoe	Under 30	No new units								
El Dorado county (Ca)	Under 30		silent	yes	silent	Yes 1 hour	silent	annual	2 per bedroom	
Douglas county (NV)	28 or less	Maximum of 600 units in Tahoe Township; none in other townships; no more than 15% in single family and no more than 20% in "tourist" districts	One permit per family; no business entities	silent	yes	Yes 30 minutes; contact person must report compliance within 1 hour	silent	annual	Must have public hearing and licensed manager for occupancy by more than 10	Renter must be 25+ Local contact (including owner) must complete a training course; county publishes map of STR Time shares exempt
Mono County	Under 30	Max at 3% of units ; none in specified June Lake tracts; 3% in others	No—one per person;	yes	Yes—in heading	Yes—not specified; owner must manage or hire licensed realtor	silent	Annual; if revoked must wait 2 years	10 people max—2 per br	Snow removal required; entities must disclose all owners; permit requires hearing at planning dept

Boulder	Under 30	no license if deed restricted; primary dwelling license restricted to max 20 days per month and less than 6 months total	No-one per person	yes	yes	Yes 1 hour	silent	2 year	Max 8 guests	Vacation rental license if rented more than 60 days is stricter—not in residential subdivision
Telluride	Under 30 or less	3 rentals (29 day total)/year in residential zones; max 400 permits	silent	silent	silent	yes	silent	annual		Moratorium in place because of “land rush” of 40 applications/month
Steamboat Springs	Under 30 (separate zoning category vacation homes has 29 day	Only 2 rentals per year; total 30 days	silent	silent	yes	yes	silent	annual	1 guest per 200 sq feet	Moratorium on new permits in effect while issues studied

	rules and no permits)									
Santa Fe	Under 30	Max 1000 units in residential; (land use sets max number); one rental in any 7 day period Except 11/15 to 1/15; no adjoining properties can qualify; must be 50 feet apart;none if CCRs ban	No –one license per natural person (owner can be entity but permit holder must be person0)	silent	yes	Yes (1 hour response)	silent	annual	10 pm quiet hour	Resort facilities with sp use permit exempt; condo projects exempt from “adjoining’ rule but no more than 25% of units can have permit; city hires Host compliance to moniutor AirBnB etc.

NOTE: All ordinances restricted parking to on site and not in street and all ordinances included quiet times usually from 10 pm to 7 or 8 am. Most ordinances state no devices can be audible outside premise; all require compliance with local noise ordinances. All ordinances state permit is void on a transfer.

From: [Shayna Englin](#)
To: [Planning Commission Comments](#)
Subject: SUPP0RT for agenda item 4: Land Use Services Department STR regulations]
Date: Sunday, January 30, 2022 12:29:23 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Commissioners:

I urge your support for the Land Use Services Department's redlined revisions to Chapter 84.28 related to Short-Term Residential Rentals.

As a homeowner in unincorporated San Bernardino County, a former STR host, and current full-time resident, the proposed updates to the regulations are important to better balance the interests of our community's neighborhoods, the property rights of those who would like to leverage their property as investments rather than homes, and the economic impact of tourism on our local economies. The updates reflect the current realities of the rapidly growing popularity of STRs and evident challenges of that popularity on the quality of life of those of us who call our property "home," not alternative hotel.

Thank you for your consideration.

--

Shayna Englin | m. 323-217-3565
162 C Ln Box 1878
Lake Arrowhead, CA 92352

From: [Brad Napientek](#)
To: [Planning Commission Comments](#)
Subject: Comments on 2/3 Vacation Rental Item
Date: Monday, January 31, 2022 10:22:44 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My family has owned property on the Sunburst Circle in Joshua Tree since 1980. My parents still live in their home there purchased in 1986 and I recently inherited my grandparents' house on the same street which will be available as a long-term rental in the near future.

Without exaggeration, 100% of the problem houses on this street are owner-occupied. One in particular, across from my parents' house has been reported to code enforcement for numerous violations including illegal dumping, inoperable vehicles, lights shining in neighbors' yards, and illegal construction, including construction on county property. County code enforcement has done nothing. I contacted Supervisor Rowe's office about the issue and no one on her staff could even bother to respond. There are multiple vacation rentals on this street and there has never been an issue with any of them. The properties are well maintained and the guests are respectful of the neighborhood and natural environment.

...and here we are again. Instead of dealing with the real issues in Joshua Tree, the County is wasting time tinkering with vacation rental rules when these properties aren't causing any problems. Please reject these pointless changes and stand up to the loud, but small minority that is obsessed with running tourists out of our area. Start focusing on the real issues affecting Joshua Tree.

Brad Napientek
Yucca Valley, CA

From: mtnhi49@hotmail.com
To: [Planning Commission Comments](#)
Subject: Comments on Revised STR Ordinance
Date: Monday, January 31, 2022 12:12:20 PM

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I have read the redlined draft and would like to express my concern for a deletion that was made to the existing Ordinance.

The proposed ordinance does away with the provision requiring the owner/agent to maintain parking space access. This may work in Desert areas, but not having spaces cleared prior to guest arrival in the Mountains creates both a possibility for confrontations in the neighborhoods as well as difficulty for County and State snowplows to keep roadways open during winter. Based on personal experience, most renters arrive in late afternoon/evening and are not prepared to clear a space off of the roadway for their vehicles. The STR properties are not required to have a suitable shovel available. They may be confronted with a 3 foot high snow berm at the roadway's edge left by the plow and then a substantial amount of snow on the parking space as well. The renters tend to leave their vehicles parked in the roadway (in violation of the Ordinance) or park them on someone else's private property or driveway. This leads to confrontations that can and will be avoided if you re-insert the provision requiring the owner/agent to maintain access to the designated parking spaces. This situation has occurred numerous times in our neighborhood due to inconsiderate owner/agents and renters.

Your attention to this particular section of the ordinance would be appreciated.

Mr. Jody Brumm
Twin Peaks, CA

From: [Jennifer Gladysz](#)
To: [Planning Commission Comments](#)
Subject: Comments regarding the STR draft ordinance
Date: Monday, January 31, 2022 3:22:20 PM

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To Whom it May Concern:

I live in North Joshua Tree with my husband and two children. I own Cocoon, a STR property management company in the area. I'm in support of reasonable STR regulations but I have some concerns about what's being proposed in the draft.

- 2-night minimums: Most importantly, the 2-night minimum is unreasonable. We have many guests who come to the area just for the day (often splitting up their time between the High and Low Desert) but without a 1-night stay option they may skip our area. It will also decrease income for housekeepers. We've hosted many 1-night stays without any issues. I think there should be no minimum but an alternative could be 1-night minimums on weeknights and 2-nights on weekends.

- Occupancy Limits: I'd like to see occupancy limits based on square footage instead of bedrooms. We do get families that like to travel together.

- Alternative Structures: I hope to see a SUP option available for some alternative structures in the near future. This is especially important for locals, who live on their land and want to support themselves.

- Unless I missed it, I didn't see anything about noise monitoring devices. Noise Aware or similar could be required for all STRs. Noise Aware has both indoor and outdoor monitors.

The issues I see with short term rental properties are when there are absentee owners who don't manage their properties well. We make sure our guests are educated on what's expected and how to be good guests and neighbors. We have a 24/7 phone number for both guests and neighbors in case of any issues. There's no reason a STR can't be run responsibly and those of us who are operating in good faith shouldn't be punished because of irresponsible owners.

Thank you!
Jenn

--



Jenn Gladysz
jenn@staycocoon.com
main - 760 309 7117

From: [Planning CSU](#)
To: [Planning Commission Comments](#)
Subject: FW: Contact LUS [#2177]
Date: Monday, January 31, 2022 7:42:53 AM

From Planning CSU inbox.

From: Wufoo <no-reply@wufoo.com>
Sent: Friday, January 28, 2022 7:11 PM
To: Planning CSU <PlanningCSU@lus.sbcounty.gov>
Subject: Contact LUS [#2177]

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Please select a topic *	Planning
Name *	Astrid Johnson
Phone Number *	(760) 861-6433
Email *	skyviewfarm29@gmail.com

Please describe your request. *

I am commenting on short term rentals in the Morongo Basin to the Planning Commission. I am with a nonprofit that helps house people. The Air B&B market has taken up much of the affordable housing in the area. There are many people being displaced by their rental homes being sold for Air B&Bs or for resale at higher prices. This impacts the population because people are leaving the area. Thus the population is not growing, and there are fewer employees to support the tourist industry, school district and business's because there are not enough affordable housing for low and middle income renters or potential property owners.

From: [COB - Internet E-Mail](#)
To: [BOS District Secretaries](#); [Doublet, David](#)
Cc: [Hernandez, Leonard - CAO](#); [Bunton, Tom](#); [Snoke, Luther](#); [Williams, Pamela](#); [Martin, Abi](#); [Forrester, Martha](#); [King, Kristina](#); [Felix, Sheena](#); [Biggs, Lupe](#); [Monell, Lynna](#); [Tealer, Danette](#)
Subject: FW: Feedback on upcoming STR regulation changes
Date: Monday, January 31, 2022 11:42:12 AM
Attachments: [image001.png](#)

Good morning:

Attached below please find email correspondence received by the Clerk of the Board on 01/31/22 from Alex Bykov regarding Short Term Rentals.

Thank you,

Stephanie King

Executive Secretary III

Clerk of the Board of Supervisors

Phone: 909-387-3848

Fax: 909-387-4554

385 North Arrowhead Avenue, 2nd Floor

San Bernardino, CA 92415-0130



Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

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From: alex@alexbykov.com <alex@alexbykov.com>
Sent: Monday, January 31, 2022 11:33 AM
To: COB - Internet E-Mail <COB@sbcounty.gov>
Subject: Feedback on upcoming STR regulation changes

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi I reviewed the proposal to change the STR regulations for SBC. If I understand it correctly, there would be heavy limitations on occupancy based solely on bedrooms, and ignore lofts and living rooms. Additionally limiting bedrooms to 2 occupants only regardless of size.

This is extremely unfair. While I understand limitations by parking and by overall space (I don't think its safe or appropriate to stuff as many humans as possible in a room), it is fair to use lofts and living rooms as sleeping areas if sufficient space is present and proper sleeping equipment (bed, couch, futon, etc.) is used.

I have on many occasions gone on ski and hiking trips with my family where we had people sleep on coaches, living room futons, etc. The rental was primarily used as a resting spot so we could enjoy the outdoor activities of the location. It would be very unfair and detrimental to STR owners to apply such heavy restrictions.

Lastly consider how this could impact the designs/redesigns of properties. It would force those who want to thrive under the new rules to create many tiny bedrooms on a property to increase the limit, resulting in horribly designed homes that later would negatively impact resale.

I believe the current limitations are sufficient. If anything I would find way to prevent large well funded companies/groups from buying up properties. As these rules changes would likely impact more low value properties, owned by families just trying to make a small profit to help support themselves.

Thank you for your time,



Alex Bykov
alex@alexbykov.com



From: [COB - Internet E-Mail](#)
To: [BOS District Secretaries](#); [Doublet, David](#)
Cc: [Hernandez, Leonard - CAO](#); [Bunton, Tom](#); [Snoke, Luther](#); [Williams, Pamela](#); [Martin, Abi](#); [Forrester, Martha](#); [King, Kristina](#); [Felix, Sheena](#); [Biggs, Lupe](#); [Monell, Lynna](#); [Tealer, Danette](#)
Subject: FW: For Consideration by the County Board meeting of February 3rd, 2022
Date: Monday, January 31, 2022 8:17:32 AM
Attachments: [image001.png](#)

Good morning:

Attached please find email correspondence received by the Clerk of the Board on 01/28/22 from Clayton Steenberg regarding Short Term Rentals.

Thank you,

Stephanie King

Executive Secretary III

Clerk of the Board of Supervisors

Phone: 909-387-3848

Fax: 909-387-4554

385 North Arrowhead Avenue, 2nd Floor

San Bernardino, CA 92415-0130



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From: Clayton Steenberg <csteenber@verizon.net>
Sent: Friday, January 28, 2022 8:49 PM
To: COB - Internet E-Mail <COB@sbcounty.gov>
Subject: For Consideration by the County Board meeting of February 3rd, 2022

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Honorable Board Members:

I own my home and two adjacent lots in Joshua tree that is surrounded within a block and a half by a

total of eleven (11) STR's.

I never imagined when I bought my home nine years ago that I was going to be invaded by noise, speeding traffic, debris, and general malaise. I should also state that I am a former police captain of 18 years of service and a recently retired 30-year criminal law professor. In essence, I have a great deal of experience and understanding when it comes to human behavior and related causes of criminality.

My first impression of your rewrite of the county code 84.28 pertaining to STR's is positive with a few exceptions that I would hope can be amended to include more rational consideration.

1. I view the number of bedrooms allowed for STR's being contingent on the assessment/building documents a very good stipulation for a permit.
2. I view section 84.28.070 pertaining to "Good Neighbor Information" also a positive advance.
3. I would suggest "Daytime Guests" as described in section 84.24.060 is extremely problematic by allowing so-called "daytime" guests to be on the property for 14 of 24 hours is beyond any comprehension. How would the STR owner know guests are on the property, and how would an adjacent viewer, such as myself, be able to distinguish the tenant from the guest? Furthermore, allowing more people on the property just creates more likelihood for noise. It would seemingly be wiser to eliminate this item completely and not encourage such behavior. Especially given the 8AM-10PM incorporates late afternoon and nighttime hours that are most likely to be susceptible to noise.
4. I would recommend in section 84.28.070 (noise) that STR owners be required to list the various prohibited noise violations on their STR advertisements and have the same posted in full view on the property as well. Such postings would help owners and tenants alike to become familiar with all the noise prohibitions. Additionally, I would suggest that adding the wording of "blue tooth" speakers are also prohibited under amplified sounds.
5. In addition, I would suggest under section 84.28.070 (safety) the prohibition of solid fuel firepits etc. in the desert regions as well given how dry they become in summer and drought periods.
6. Finally, a word about the legal standard of "reasonable person." As most legal scholars will attest the term is not well defined in any state and California is no exception. For example, many code enforcement officers have stated to me if the noise violation is during the daytime there is not much they can do about it. That actually is not true at all. For example, police officers arrest people for squealing tires or loud exhaust with automobiles any time of day or night under the standard of peace disturbance of a "reasonable person." Therefore, I would like to see code enforcement officers understand that permanent residents such as myself are commonly willing to testify against STR violators and eye witness testimony can be much stronger evidence than audio recordings. In short, my peace just like anyone else's can be disturbed anytime under the "reasonable person" standard in California.

In closing, it is my hope that you will consider the above views as being from a person who tries to live day-to-day in the comfort of my home and that my peace is commonly disturbed by outsiders all hours of the day and night. Furthermore, it is my sincere hope that you can strengthen the STR code to better serve the true population of Joshua Tree and other surrounding communities filled with people just like me. And I am available to further discuss my views with anyone on the board wanting more information.

Respectfully,
Clayton Steenberg
6944 Saddleback Road
Joshua Tree, CA 92252

From: [COB - Internet E-Mail](#)
To: [BOS District Secretaries](#); [Doublet, David](#)
Cc: [Hernandez, Leonard - CAO](#); [Bunton, Tom](#); [Snoke, Luther](#); [Williams, Pamela](#); [Martin, Abi](#); [Forrester, Martha](#); [King, Kristina](#); [Felix, Sheena](#); [Biggs, Lupe](#); [Monell, Lynna](#); [Tealer, Danette](#)
Subject: FW: Lake Arrowhead Mountain People/STR
Date: Monday, January 31, 2022 8:15:05 AM
Attachments: [image001.png](#)

Good morning:

Attached please find email correspondence received by the Clerk of the Board on 01/31/22 from Dale Fisher regarding Short Term Rentals.

Thank you,

Stephanie King

Executive Secretary III

Clerk of the Board of Supervisors

Phone: 909-387-3848

Fax: 909-387-4554

385 North Arrowhead Avenue, 2nd Floor

San Bernardino, CA 92415-0130



Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

County of San Bernardino Confidentiality Notice: This communication contains confidential information sent solely for the use of the intended recipient. If you are not the intended recipient of this communication, you are not authorized to use it in any manner, except to immediately destroy it and notify the sender.

From: dalefishermusic <dalefishermusic@yahoo.com>
Sent: Monday, January 31, 2022 7:24 AM
To: COB - Internet E-Mail <COB@sbcounty.gov>
Subject: Lake Arrowhead Mountain People

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I am writing you as I will not be in town for your upcoming STR/ planning meeting. You should be aware there are many Lake Arrowhead residents trying to limit access to the mountain from the rest of your citizens in SB county, and beyond. They have zoned and regulated

the place to death, so as to keep "their" mountain to themselves. It is a huge problem I just became aware of, and you will be hearing more from me in person when I am able to attend. Thank you for your service to our community.

Sincerely,

Dale Fisher

Sent from my Verizon, Samsung Galaxy smartphone

From: [Cozad, Claire](#)
To: [Planning Commission Comments](#)
Subject: FW: Planning commission -short term rentals
Date: Monday, January 31, 2022 10:17:15 AM

Planning Commission,

I am forwarding a comment received to our office regarding Short Term Rentals.

From: skyviewfarm29 <skyviewfarm29@gmail.com>
Cc: Wayne Hamilton <Wayne.Hamilton@morongo.k12.ca.us>
Subject: Planning commission -short term rentals

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I am Astrid Johnson with Morongo Basin ARCH. We are a nonprofit that focuses on housing the low income through county grant funds (HHAP). I am writing to you in hopes that you will share this email with the planning commission. I also sent a comment directly to them. My concern is how the Air B&B industry has negatively impacted the housing market in the Morongo Basin. There is now the problem of home values dramatically increasing and property owners selling off rental homes. Many low to middle income renters are displaced and can't find affordable housing. This population is families and seniors. Thus this population is forced to move out to another area, leave the state or just become homeless in cars or in a motel. There are even reports that the school district has teachers that can't find housing. So there is a population shift happening. The permanent population of the area will drop, and employers will lose workers who can't find housing. This tourist industry will then falter because it will lose supportive services from the towns/cities of the area. Where are the house cleaners going to live? The Stater Bros, Vons, and Walmart employees all need affordable housing to stay in the area as well. The problem is there is very little left, so we sadly recommend people leave.

Sent via the Samsung Galaxy Note10, an AT&T 5G Evolution capable smartphone

From: [pat foley](#)
To: [Planning Commission Comments](#)
Subject: public comments at February 3rd meeting
Date: Monday, January 31, 2022 8:21:36 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Ms. Biggs,

On the agenda for the planning commission meeting on Thursday it states that if one wants to comment on an agenda item, we need to fill out an online request form in advance of the meeting. The agenda then gives a link which goes to a website but I cannot find an online request form.

Can you please send me a link directly to the form?

I wish to speak regarding Agenda item 4 - regarding Short Term Rentals.

Thank you,
Pat Foley

From: [Juneffer Gambin](#)
To: [Planning Commission Comments; COB - Internet E-Mail](#)
Subject: Regarding New STR ordinance
Date: Monday, January 31, 2022 10:45:55 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Here are our thoughts regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

The new ordinance does not take into consideration that the desert and mountain areas are totally different markets.

Therefore if you must change the current ordinance, Please adopt a different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of Big Bear lake's current ordinance and even more stricter with the nightly minimums. Homes in mountain area are in smaller lots and closer to neighbors.

- The vast desert region of SB County is NOT Palm Springs.
- The vast desert region of SB County is NOT Big Bear.
- The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
- Parcels are primarily over half an acre.
- We are thinly populated.
- We have plenty of parking on most of our properties.
- We are spread out and don't have much traffic congestion.
- Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- The county is attempting to shoehorn two very different areas into a single set of STR rules.
- If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for every type of property.

- OCCUPANCY

I oppose the proposed change in the occupancy calculation. Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Limit the number of total guests by using the square footage. Maximum of 12 guests for all homes will do enough to curb the gathering, partying and events.

Less than 600 - 2 guests

600- 800 square ft - 4 guests

800-1200- 6 guests
1200-1600 -8 guests
1600-2000- 10 guests
Over 2000 -12 guests

- Homes on large parcels (0.5 acre or greater) should be permitted 2 additional guests than homes with less or counted 1 adult per 200 square footage.

- MINIMUM STAY

I oppose the proposed change to two night minimum stay. This seems irrelevant. Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

- CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12. As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule. There is not even an option to advertise the count any differently on most booking platform.

- MAXIMUM PARKING

- I oppose the proposed change to limit maximum parking.

- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time. Thirty minutes is an unreasonably short time. This isn't long enough time. Even an on call healthcare worker dealing with life and death situations (like me) are given an hour to respond to a call.

- PERMIT transfer

Permits should continue to be transferable and bi annually for STR's with no record of non compliance. This is just going to be more work for the county, and more resources tapped into that is unnecessary. Please do not punish those who are following the rules, instead put resources into enforcing that those that operate non permitted STR's get fined and waitlisted.

Thank you for your consideration,

Juneffer Gambin
60266 Alta Loma Dr, Joshua Tree
june_w@yahoo.com
310-245-0266

Sent from my iPhone

From: [JOAN CLINE](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#)
Subject: Regulations for Short Term Rentals/Big Bear Valley
Date: Monday, January 31, 2022 10:05:58 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Commissioners and Supervisor Rowe,

As a resident of and property owner in Fawnskin, I wish to express my strong support for strict regulations of short term rentals in all residential areas within Big Bear Valley.

The disrespect shown by renters to full time residents and property owners continues to prove appalling. A lack of adequate parking provided by the rental agencies causes vacation renters to park in neighboring driveways without permission, on private lawns and adjacent properties and along both sides of narrow residential roads, often blocking those roads. Not only is this a major inconvenience to residents, it denies access to emergency vehicles. In snow country and neighborhoods surrounded by state and national forest, it is also an invitation to disaster.

Joan Cline

From: [Hunter Vurbef](#)
To: [COB - Internet E-Mail; Planning Commission Comments](#)
Subject: San Bernardino County Short Term Rental Ordinance
Date: Monday, January 31, 2022 8:03:17 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
- The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
- San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- The vast desert region of SB County is NOT Palm Springs.
- The vast desert region of SB County is NOT Big Bear.
- The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
- Parcels are primarily over 1 acre.
- We are thinly populated.
- We have plenty of parking on most of our properties.
- We are spread out and don't have much traffic congestion.
- Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- The county is attempting to shoehorn two very different areas into a single set of STR rules.
- If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
- I oppose the proposed change in the occupancy calculation.

- Occupancy should continue to be based on habitable square footage, NOT bedroom count.
- Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
- I oppose the proposed change which would limit STR permits to 1 per parcel.
- The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
- I oppose the proposed change to two night minimum stay.
- Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
- In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
- At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
- I oppose the proposed regulation of guest children under 12.
- As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
- I oppose the proposed change to limit maximum parking.
- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

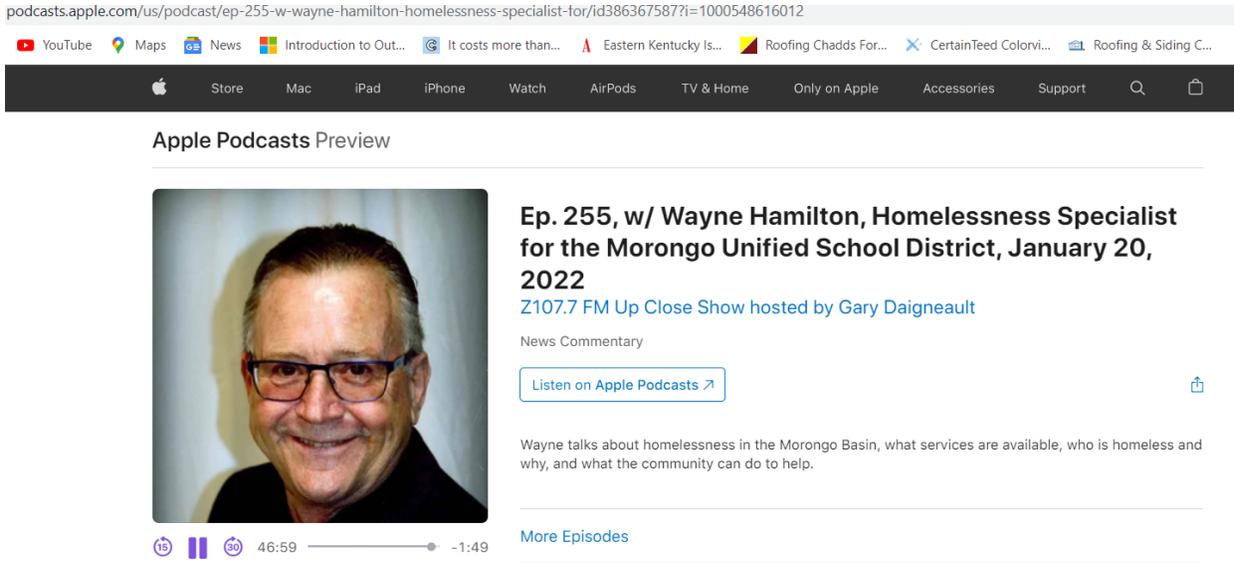
Thank you for your consideration,

Hunter Vurbeff
9621 Rawson Road Morongo Valley

From: janetjohnstr@earthlink.net
To: [Planning Commission Comments](#)
Subject: Short Term Rentals Feb 3rd. Wayne Hamilton MUSD Homeless Liaison on Z107.7 and Morongo Basin ARCH comment letter
Date: Monday, January 31, 2022 2:03:55 PM
Attachments: [image001.png](#)
Importance: High

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The screenshot shows a mobile interface for an Apple Podcasts preview. At the top, there's a navigation bar with various app icons. Below that, the title of the podcast episode is displayed: "Ep. 255, w/ Wayne Hamilton, Homelessness Specialist for the Morongo Unified School District, January 20, 2022". The host is identified as "Z107.7 FM Up Close Show hosted by Gary Daigneault". A "Listen on Apple Podcasts" button is visible. Below the button, there's a brief description: "Wayne talks about homelessness in the Morongo Basin, what services are available, who is homeless and why, and what the community can do to help." A progress bar at the bottom indicates the current playback time is 46:59 out of a total duration of 1:49.

<https://podcasts.apple.com/us/podcast/ep-255-w-wayne-hamilton-homelessness-specialist-for/id386367587?i=1000548616012>

Dear Planning Commissioners,

We ask you to please take the time to listen to this podcast. We have included timestamps for your convenience, too. This podcast gives you the commentary of two well-known pillars of the community, who are very familiar with the Morongo Basin and have dedicated years to its care. It is truly surprising and sad to “see” what the numbers really are.

Gary Daigneault is the long time reporter and radio personality and co-owner of Z107.7 fm in Joshua Tree.

Wayne Hamilton has been the Morongo Unified School District (MUSD)Community Outreach Coordinator/Homeless Liaison for the last 14 years, and was the founder of Morongo Basin ARCH, and is a retired nurse.

They spoke on 1/21/2022. All quotes/dictation are close approximation or summary.

Thank you, Janet Johnston
Director of Morongo Basin Conservation Association (MBCA)

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3:40 Wayne: MUSD is mandated under HUD to use the McKinney Vento definition of homelessness. This can be

unsheltered living out on the street or in a wash, doubled up with another family, inadequate housing, or at risk of losing housing. It can be if kids are staying with another family, too.

4:27 Wayne: **“Now we have families doubled up, two and three families deep.”** They can be asked to leave. It is not stable housing. Kids staying with other families, are considered unaccompanied youth.

5:10 Gary: Wayne gave some eye-opening statistics. In Morongo Unified, how many kids are identified as homeless?

Wayne: There are 7600 enrolled in MUSD. Our homeless count is usually 10% of that.

Gary: **So over 700 kids are identified as homeless?** Wow...

Wayne: Many other families that we know that, are not identified, no way to have an exact number. Families are afraid of coming forward saying they are having housing problems. The laws let kids stay in school of origin if they move, for the remainder of that school year.

6:50 Wayne: My job is to remove the barriers so the kids can go to school.

9:45 Gary: What is the biggest cause?

Wayne: Inflation, prices of housing are out of reach for people on fixed income. There is little housing available. **I looked up apartments for rent in Joshua Tree and found only 3.** One bedroom for \$1500, 2 bedroom for \$1900, and 4 bedroom for \$2900. Looked on Trulia, Yucca Valley came up with 6.

10:45 Gary: **Joshua Tree National Park Director David Smith** says seasonal ranger couldn't find a place to live. Still having a hard time for the park rangers to stay.

Wayne: **This is the case across every industry including for MUSD for teachers. They are having difficulty finding housing....** Main cause ...see sites that say Air BnB's are get rich scheme, get Air BnB in the Morongo Basin. **1/3 of 4,000 housing units are short term rentals.** The take housing off the market, the little inventory left the landlords are looking for 3x the amount of rent for income, good credit, clean rental history. Need \$2400 a month income. Some of that is out of reach. Credit scores 600 and above.

Gary: There is less housing available, higher standard to rent, and higher price so it is easy for people to slip into homelessness. How many are couch-surfing, staying at someone else's home.

13:40 Wayne: It is hard to grasp as people don't identify as homeless.

14:45 Wayne:

Eviction moratorium only applied to covid reasons, so now snowballing. US Treasury sent money to counties. SBC received 44 million, so used their own money and resources to do their own program for covid, and spent 34 million on housing issues, and helped 4,500 renters. State and County program set up conflict and confusion as to where to apply, and different rules. So, State took back the remainder, and run it all through the State now. "Housing is Key" is the program. There is a Website. Landlord can also apply for people and see what is going on and get update. 12 month rental assistance program 3 month behind, 8 month in future and also utility assistance. For most rental assistance there is accountability.

We had money for grant for MUSD received \$195,000 to use. There is accountability.

{Wayne Hamilton reported in January 2021 at a virtual MAC meeting that he helped 85 families stay in their homes or find housing using this grant. But, he had to send 6 families as far as Needles, Apple Valley, and Blythe to find housing, due to lack of housing here. The grant ran out right before things got really bad in the spring and countless families were affected and are still being affected.}

Moratorium is about to drop off. Program to start with is "Housing is Key", would be fastest. Landlord

can confirm money is happening. If in jeopardy of losing housing, look at program and can call Wayne and he can try to match with a program.

21:49 Gary: **See all the time on social media “living in house for three years, we just got notice, we can’t find anything,” and seeing more and more of that.**

Wayne: I am getting quite a few calls a day like that. Real Estate market has increased, people doubling money, so entices to make transition and make return on investment and done with it. When sold either bought for investment or bought for a long-term situation, not put it back on the market, if own a house get 2 or 3 calls a day. A seller’s market, a lot have cash offers that can close quick. **SO that means family in house becomes homeless.**

24:43: An Ashley tells her story of being homeless, because code enforcement came and red-tagged house. Been homeless for about 4 months. Going from hotel to friends. Where go look for a place?

Wayne: housing list same in newspaper and on web. Some landlords have housing but not in reach. Some programs have assistance for moving and deposits. Morongo Basin Arch, Community Action Partnership has funding. Different programs at different times. More details... Wayne say call may be able to point in a direction and have a better reception.

28:40 Gary: There we go, I don’t want to say typical, but it illustrates the problem going on. A woman who is employed had a place to stay and through no fault of her own...

Wayne: And no room to negotiate it. The biggest problem that we see with people that are losing housing, is that this is something that is unavoidable....as property was red-tagged and have to move. If get behind on rent, contact the landlord. They contact landlord and they say if the people had let them know what is going on we could have avoided eviction. (Wait too long, can be too late.)

Gary: Problem for Ashley is finding a place. She is eligible for some programs like rental assistance as it is taking all her money to stay in a motel. Finding a place is the problem.

30:44 Gary: You mentioned an organization called Morongo Basin Arch. *{Please see Astrid Johnson’s statement, below}*

Wayne: MB ARCH is a nonprofit. I started it about 15 years ago when first started working for the District. No one knew or trusted so needed a non-profit to get the programs. “Aligning Resources and Challenge in Homelessness”. Like 6 people got together worked on some money and grants collaborated with other agencies down below that had funding. When started getting busy had to focus on MUSD, Astrid Johnson came forward. She has done amazing things. Worked with 29 palms to get properties and get folks off the street and get into more permanent housing.

MB Arch has housing, two houses one women’s and one men’s with waiting list. Two houses...sounds like it could be a lot more. What can you do to help ARCH. If give money goes to food or to housing. Community Navigation Center. More effective to help ARCH, than do something yourself, as more connected. Money not get redirected and spent on the wrong thing.

Several Food programs are up here. Match people with the supply. It is good to have a central service. Some do know where to go, others do not know where to go, others do not want help (pride or nervous about asking) or need to be connected.

There are a few that choose to be homeless, others tell you that, but they really do not want to be, but do not want you to think they have to do something they do not want to do.

Sheriff Department has a program called HOPE. Homeless Outreach Proactive Enforcement. Active below but hope for more up here. Officers assigned to the HOPE team to connect to services. More

cost effective to get perpetually homeless off the street than helping them on the street.

39:44: Local Services available: TAY Center, Quick Stop in Yucca up to 25, Housing Program, County Social Services have a homeless assistance program ...used to be once in a lifetime put into a hotel and moving costs...now it is once a year and connected to other housing programs in the county. Housing Vouchers still have to be pre-screened. Be honest to landlords.

29 Palms allocated money to homeless. Yucca has members on East Valley Regional Steering Committee.

County in 5 regions... Give regions opportunity to receive funding... so goes by your homeless count.

45:55: Point in Time Count Money goes to regions per percentage of county.

47:20: **Significant increase in unsheltered homelessness between 2019 and 2020 19.9% increase 3,125 in 2020**

127 unsheltered locally in Morongo Basin, their definition is those living outside.

Gary: Homeless in CA seems high.

Wayne: A bit higher than northern states but our numbers are the norm in southern states.

+++++

We had asked Astrid Johnson to write an impact statement back in 9/29/2021, this is what she wrote:

<https://morongobasinarch.org/>

I am with a nonprofit, Morongo Basin ARCH that focuses on housing the homeless. We have county funding for housing retention and rapid rehousing.

The housing market has recently dramatically changed. Our area used to be known for affordable housing in the desert, but now that is changed. The covid shut down and then reopening caused a surge in the Air B&B market. Low cost housing was soon bought and converted over to Air B&Bs. Other housing was bought by LA investors and converted over leaving only a few homes left to rent. Because of the high demand, these rentals became pricey. Housing in general increased in value. This affected renters because owners soon saw the value of the houses dramatically increase and sold them, often for cash. The x-renter is then homeless in a motel trying to find new housing they can afford. These are often the clients I work with, seniors scared with no housing in sight, mothers with children in a car, etc. The AIR B&B market needs to be better managed to preserve housing for low income renters. These are the workers that support the tourist industry. They work at Walmart or at a fast food restaurant. If they can't find affordable they leave and the support for the tourist industry goes.

*Astrid Johnson
Morongo Basin ARCH
760-861-6433*

+++++

From: [GARRY HAVENS](#)
To: [Planning Commission Comments](#)
Cc: Supervisor.Rowe@bos.sbcounty.gov
Subject: Short term rentals
Date: Monday, January 31, 2022 11:42:37 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

As a full time resident in Fawnskin; I fully support the regulations in the petition. I have experienced problems with short term rentals in the neighborhood.

Thank you, Garry Havens

Kerrie Aley

Pipes Canyon- Pioneertown

Email 6102ka@gmail.com

31 January 2022

San Bernardino County Planning Commission

cc. Dawn Rowe Third District Supervisor

cc. San Bernardino County Land Use Services

Primary Issue- Lack of STR Special Events Permits for music events, weddings, parties on rural living and residential properties.

Dear San Bernardino County Planning Commissioners,

Thank you for the opportunity to provide public comment on the proposed ***Development Code Amendment Chapter 84.28*** related to Short-Term Residential Rentals.

I have listed below my reasons for strongly supporting the STR ordinance changes.

You will also find below my comments on changes needed to address issues with Special Event Permitting (STR weddings, parties, musical events, etc.) on Rural Living properties.

STR Amendments-

I strongly support the following changes-

✓ The limit of one STR per parcel.

Reason- I live in a very rural part of Pipes Canyon near Pioneertown. The STR parcel limit is very important to maintain the health of wildlife, protect nearby conservation land and preserve our dark sky/ low ambient noise/low vehicle traffic environment.

I have heard comments that larger parcels should have more permitted STRs, but the reality is that larger rural parcels for the most part should remain undisturbed providing habitat for native plants and wildlife while preserving the desert soil structure which is very fragile and mostly undisturbed.

There is a current problem in our area with new property owners scraping land in excess of fire codes to build new structures, event spaces or to add trailers and unpermitted camping areas for commercial ventures. Allowing additional STRs on a parcel would in a few years dramatically change our rural area and destroy the beauty and wildlife that attracts tourists.

✓ The restriction on the maximum number of 2 STR permits for individuals, trusts and LLC and a ban on STR Permitted by Business Entities.

This change is a step in the right direction where the local economy is promoted rather than fueling outside investors' profits.

✓ I also support the commonsense position that owners of multiple permitted STRs in excess of the new limit and business entities be grandfathered in (as long as they are in good standing as far as operation).

✓ I also support the shorter permitting period of one year as it encourages STRs to be good neighbors.

The issue of late night “Party” Guests- The proposed STR change only restricts the number of guests between the hours of 8 am - 10 pm. **The ordinance should state whether guests are permitted after 10 pm and how many are allowed.**

*b. STR 800 – 1,200 square feet: maximum of six occupants
(6) Guests. In addition to the maximum overnight occupancy, **a maximum of four daytime guests may be permitted between the hours of 8:00 a.m. – 10:00 p.m.**, based on individual evaluation of the STR permit application, considering space available for guest parking.*

Issuing Commercial User/Special Events- The existing Special Events Code only requires a permit for commercial or special events on residential Rural Living properties in excess of 200 or 500 guests.

The proposed amended STR commercial activity restriction currently allows all of the below activities with the addition of commercial musical events on Residential and Rural Living properties) as long as the event is staged with less than 200 or 500 people in attendance. There is no limit on the number of events per year.

Many cities require a Special Event permit for all events greater than 75 people and for ALL commercial/special events on residential properties.

Proposed Amended STR Code

*(gj) SHORT-TERM RESIDENTIAL RENTAL UNIT (STR).
A short-term residential rental unit STR **shall not be used for any commercial activity, which includes but is not limited to weddings, wedding receptions, corporate retreats, business meetings or conferences, filming photography shoots, a fraternity party, or any other similar gathering, unless regulated under an approved County-issued permit.***

Existing Special Event Code- § 85.16.030. Procedures

(3) **Exemptions.** *The following temporary events are exempt from the requirements of obtaining a Temporary Special Events Permit in compliance with this Chapter:*

(C) *Any Class I minor event as defined in Division 10 (Definitions) with an anticipated attendance of less than **500 persons per day.***

(D) *Any Class II minor event with an anticipated attendance of less than **200 persons per day.***

Comments on Special Events-

Events and Commercial Venue Use are not being permitted. I searched for Special Event permits in the Pioneertown & Joshua Tree area and could find less than 10 applications going back a few decades. In recent years there have been many countless unpermitted events ranging from large music festivals, weddings, parties, business promotions, etc. that have greatly impacted residential areas.

Here is a sampling of venues being promoted for weddings. Source-

<https://thequailandthedove.com/blog/getting-married-joshua-tree-high-desert/>

Pioneertown Wedding Venues

Rimrock Ranch — Rimrock Ranch is a beautiful 11 acre ranch originally built as the weekend retreat for western actors like Gene Autry and Roy Rogers. The ranch consists of four rustic cabins, retro-fitted Airstream trailers, a lodge and the internationally famous Hatch House.

The Pioneertown Motel — Established in 1946 by Roy Rodgers, the Pioneertown Motel boasts a one of a kind Hollywood history. Just steps way from Pappy & Harriet's, this rustic hotel has been restored and updated and is a great spot for a Pioneertown wedding.

Blackbird Ranch — Over 20 acres with a large Spanish ranch house for accommodations. Views of the Sawtooth Mountains and Pioneertown Mountains Preserve and a lush landscape of Joshua Trees, pine trees and local vegetation, with landscaped areas for ceremony and receptions. On-site parking available.

Historic Pioneertown Soundstage — One of the original, historic Pioneertown structures, the Soundstage is available for weddings. If rustic and old west are what you are looking for, you will find it here.

Joshua Tree Wedding Venues

The Desert Lily's Love-Love — A magical, hi-desert, bohemian venue perfect for rustic/romantic wedding ceremonies and receptions. Stunning sunsets and panoramic views of Joshua Tree National Park make this the picture-perfect backdrop for your special event.

Thunderbird Lodge Retreat — Perched on the edge of Joshua Tree National Park, the Thunderbird Lodge offers a breathtaking high desert views. They can accommodate intimate indoor events as well as outdoor gatherings.

[Sacred Sands](#) — A small inn located just outside the west entrance of Joshua Tree National Park with mountain and desert valley views. Featuring both indoor and outdoor rooms and spaces, this intimate setting is ideal for elegantly rustic weddings and events for up to 130 people.

[Mojave Sands](#) — Just a few miles from the park entrance, this motel is “an eco-chic moroccan desert refuge, celebrating modern-minimalism.”

[Hicksville Trailer Palace](#) — This “trailer-park” motel is great for fun, quirky, and intimate weddings. Theme-inspired trailers, including a bar trailer for events, mini golf, fire pits and more.

[Spin and Margie’s Desert Hideaway](#) — Five minutes from the national park, this boutique Joshua Tree Inn is part Mexican hacienda, part artist’s palette.

[Green Acres Ranch](#) — Green Acres Ranch features two artistic and cozy cabins on ten acres of desert scenery, surrounded by mountains, boulder formations, washes and wildlife. They accommodate a couple of small weddings of up to 80 people at the ranch each year.

[Folly](#) — This modern, off-grid home was designed and built by architect and designer Malek Alqadi. Perfect for small, intimate events of 25 guests or less. Folly blends indoor-outdoor living in an innovative minimalistic design.

[Joshua Tree Ranch House](#) — Centrally located in downtown Joshua Tree and adorned in vintage 1940s decoration with distinctly authentic desert amenities.

Yucca Valley Wedding Venues

[Tumbleweed Sanctuary](#) — Once a 150-person seated church, the Tumbleweed Sanctuary is now designed for private use, spiritual services, ceremonies and matrimonyes. Set on 10 acres of desert, tucked away in a quiet residential area, but less than a mile from local conveniences.

[Dream Catcher Ranch](#) — A hidden gem located in Yucca Valley’s Western Hills Estates, surrounded by beautiful rock formations. There are two houses on the property, as well as a jacuzzi, pool, and ten person hot tub hidden in the boulders. Full of unique and artistic details! They can accommodate up to 100 wedding guests, and 13 overnight guests, plus more in tents.

[Rock Reach House](#) — This unique, modern steel house on 2 1/2 acres of high desert is great option if you are having a small wedding (25 people or less).

[Cactus Moon Retreat](#) — This mid-century jewel has a private yoga studio, fire pit, bbq, pool and detached converted horse stable pool house on 2.5 acres of Mojave desert. It can accommodate events of up to 50 people.

[Echo Ranch House](#) — A semi-secluded 1966 Bungalow on six acres in Flamingo Heights. Not only is this a great location for intimate weddings of up to 50, the owners are in the event industry and know how to curate a rad event.

Morongo Valley Venues

[Crazy Horse Ranch](#) — A family-owned ranch that offers accommodations, horse riding lessons, private trail rides, quaint weddings, and other special events.

[Genuine Draft Ranch](#) — This hideaway can hold events up to approximately 125 guests. They have 10 acres — five developed and five that is land with a panoramic view of the valley, a canvas to create any style you want. This wild west ranch has a barn, a saloon and more.

I am aware of the following other Rural Living or Residential zoned properties that are being used for either commercial or non-profit events. This is by no means a complete list of residential properties using their properties for commercial events.

The Ruin Venue (Pipes Canyon) associated with an STR.

<http://www.theruinvenue.com/>

Garth's Boulder Gardens (Pipes Canyon Non-Profit)

Furstworld (Joshua Tree Non-Profit)

Sacred Sands Joshua Tree

<https://www.eventective.com/joshua-tree-ca/sacred-sands-432456.html>

The Mirror House Joshua Tree 100 Person

https://www.peerspace.com/pages/listings/5cfb1ac041d4e1000e873afa?sort_order=7t

Joshua Tree Luxury Desert Retreat, Inn & Special Events 110 people

https://www.peerspace.com/pages/listings/5d70afddbde64f000ff68349?sort_order=9

Rustic Hacienda Horse Ranch Surrounded by Wild West Theme , Pioneertown 250 people

<https://www.peerspace.com/pages/listings/5caf822e70b345001b693c7f>

Requested Change to Special Event Permitting on Rural Living or Residential Zoned properties.

Commercial Events

It seems to me that ALL commercial events (on Rural Living or Residential properties) ...whether they are a permitted STR or not... should be required to obtain some type of special event permit.

There should be a cap on the size and number of these special events. Otherwise the County has de facto approved an STR AND/OR a commercial event venue next to someone's home.

Private Events All private events larger than 75 people on these types of properties should require a permit.

Bed & Breakfast Properties should be required to either have a restriction on the size & number of events a year. The maximum number of special events per year should be included in their conditional use permit.

Nonprofits who conduct arts based or public serving functions should be given a low fee conditional use permit to operate events under specific constraints.

Revenue Source for Special Event Permit Enforcement/ Fines

It seems to me that the existing fine for holding a 500 person unpermitted commercial music festival on vacant land is not a deterrent. The fines for Special Event problems should be re-evaluated and increased!

Given the number of STRs promoting their residence as an event space, can a portion of STR revenue be allocated for Special Event enforcement?

I appreciate SBC for tackling the STR issue and understand that a measured, steady approach is the best way to promote local economic development and our quality of life.

Thanks for reading this!

Kerrie Aley

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Thank you for hearing my thoughts on the county proposed changes during your meeting on February 3, 2022. I am a full-time, 30-year resident of Joshua Tree, CA. My husband and I occupy the 2.5 acre property, in which my STR is located. Thankfully, to the success of our STR, we were able to purchase two additional 2.5 acre lots adjoining our property. It has been our dream to have the surrounding properties and our STR has afforded us a local livelihood and continued ability to support our community with positive growth, personally and collectively. It has been our desire and effort to comply with the county regulations and have obtained our STR permit.

My sentiments reflect that of many of my fellow STR hosts in the desert region. I have been a STR host for 4 years and have never had issues or complaints. We personally are on premises and manage with kid gloves. We strive for a delightful experience for our guests and our community, alike! I continue to wait, protected under moratorium, for county to write code proposal for a 2nd unit, an alt structure and am hopeful!

- **DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT**
 - **There must be different STR rules or adjustments made for the Desert region versus the Mountain region.**
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - **If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!**

- OCCUPANCY
 - **I oppose the proposed change in the occupancy calculation.**
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - **I oppose the proposed change which would limit STR permits to 1 per parcel.**
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - **I oppose the proposed change to two night minimum stay.**
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated. We love our clean teams and maintenance helpers in our community!
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - **I oppose the proposed regulation of guest children under 12.**
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - **I oppose the proposed change to limit maximum parking.**
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on

a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- ANNUAL PERMIT RENEWAL

- **I oppose the annual renewal, unless there is a price reduction.**

- This would cause undue cost to those with lower income.
- This also would require more man power by the county further by having annual inspections vs. every two years.

- 30 MINUTE RESPONSE BY PHONE

- **I oppose the proposed change to phone response time.**

- Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- LIMITING STR TO TWO PER PERSON

- **I oppose the proposed change to limit STR permits to two per person.**

- I do not feel it is wise to limit responsible owners for utilizing their land as they desire. They should be allowed to purchase property and obtain a STR permit if desired.
- County should enforce violations for those doing STR remotely that have problems or aren't in compliance or have poor management.

- ALT STRUCTURES

- **I am in favor of an alt structure code being provided with parameters.**

- Should have adequate health and safety measures in place.
- Should be allowed on parcels that are <1 acre or greater and owner occupied, on site.

Thank you for your consideration,

Michele Banas
PO Box 872
Joshua Tree CA 92252
labonettojoshuatrecasita@gmail.com
760-218-4406

From: [Blake Hodges](#)
To: [Planning Commission Comments](#)
Subject: Comments on Short Term Rental regulations for Feb 3rd meeting
Date: Tuesday, February 1, 2022 7:38:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

As owners of a 40-acre property in SBC land near Twentynine Palms, and the permitted 2-listing short term rental Wild Heart Ranch, my wife Bea and I hereby submit the following comments for your consideration regarding the Short Term Rental regulations being discussed at the meeting on Feb 3rd, 2022.

Our personal mission is to increase the economic wellbeing of not only ourselves, but the county as a whole, as well as providing travelers means to enjoy this amazing county of ours. We hope you share these goals.

The main item we are strongly opposed to is the limit of 1 permit per parcel. As mentioned, we own a 40-acre parcel. On this parcel we have 3 cabins as well as our home, all well spaced apart. We currently operate 2 different Airbnb listings, both permitted through Airbnb. We have never had a complaint.

Changing the restriction to 1 rental per parcel would be a significant blow to our financial wellbeing, as well as restrict the appeal of our property in general. Travels take great joy in the space offered by our property. Restricting the entire 40-acre property to 1 rental permit would be unnecessary and absurdly detrimental, both to us as hosts, as well as guests looking to enjoy the beautiful environment of San Bernardino County.

We believe permits should be restricted by square footage, NOT by entire parcels.

Similarly, we strongly oppose occupancy being limited by the number of bedrooms. This too should be a factor of square footage. A property with 40-acres should have many more options of occupancy than a 1000 square foot lot, regardless of the number of bedrooms.

These feelings extend to other proposed measures including parking restrictions.

Because so many communities in SBC, including ours, are comprised of vast large acreage parcels, **we believe the rules should be based around that amount of space, not hard set abstract numbers.**

Or at minimum, create separate rules for more densely populated areas of SBC from the rural areas. **The outskirts of 29 Palms is a vastly different environment than Big Bear Lake or the city of San Bernardino.** Rules should be created that reflect this.

Other proposed regulations we are concerned about include the rules on the **Minimum Stay and Children Under 12** rule.

Regarding the Minimum Stay: what is the point on restricting potential income (and revenue for the county) as well as jobs (cleaners and contractors who handle these turnovers). More bookings is more money for SBC and its residents. Plain and simple.

While we do believe rules should be created to control short term rentals, we believe these rules should be implemented from as strategic of a position as possible. As responsible owners of a 40-acre parcel and 2 permitted listings, we feel we have a strong point of view from which to offer our opinions on these proposed rules.

Thank you for your time and thoughtful consideration,

Blake and Bea Hodges-Koch

2744 Watson Way
Twentynine Palms, CA
92277

(949) 412-1468
Blake@blakehodges.com
WildHeartRanchJT.com
@WildHeartRanchJT

From: [Barry Holzman](#)
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 12:27:00 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

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The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

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Occupancy should continue to be based on habitable square footage, NOT bedroom count.

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small parcels (<1 acre).

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30 MINUTE RESPONSE BY PHONE

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Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Barry Holzman
61482 El Reposo Cr, Joshua Tree, CA 92252
barry.holzman@gmail.com
949-929-1381

From: [BREANA VIOLANTI](#)
To: [Planning Commission Comments](#)
Subject: Short Term Rentals
Date: Tuesday, February 1, 2022 4:16:03 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good evening,

I wanted to start off by sharing my personal experience with you. I rented a home in Joshua Tree in Nov of 2019. 7 months later i received a notice to vacate even though I had a lease. We lost our jobs and were struggling so hard to make ends meet but managed to pay our rent on time, every month. After a year of fighting with the property management company and landlord (her reason for wanting us to leave was she was moving back into the property) we decided to finally leave. They filed an eviction on us but never followed through and have now kept our entire deposit, on top of wanting more for bogus charges. We left at the beginning of Oct 2021, the house is still sitting empty while they remodel the house and get their STR permit (owner never had intentions of moving in like she claimed).

I do understand people want all these restrictions on STRS but STRS are exactly that, a short term rental. No amount of restriction on what they can and cannot do will stop them from forcing people out of their homes, businesses struggling to find workers, schools from keeping students etc.

This is what we need, we need help with providing or keeping housing for locals to work here. The trifecta of what is happening will leave these towns in ruins. Go ask any business owner about the struggle to keep employees due to no housing or any school about how much their enrollments went down the last two years. Big Bear elementary completely closed down and Friendly Hills in Joshua Tree is next.

Please help us!!! We need to preserve what little housing we have left. Over 40% of Joshua Tree is STR now and it just keeps climbing everyday.

Here is a map the locals put together so you can see the damage it is

causing <https://www.google.com/maps/d/u/0/edit?mid=1jyONztdmqJLpAdyd1QWzjgju6d5z82j&usp=sharing>

Please put a cap or limits now, please consider a moratorium like many over communities have done to preserve the last of the housing needed to sustain a town.

I understand you are trying with these new ordinances but all of them are only hurting the local STR owners rather than helping us. Corporations will just find loopholes to stay in our communities (thats exactly what they will do, mark my words).

We are begging you for help! Please preserve the rest of our housing now! Please consider caps or limits, locals will never give up until something like this happens.

Thank you
Breana V

From: [david salko](#)
To: [Planning Commission Comments](#)
Cc: kevinjsantora@gmail.com
Subject: with respect for your service to our community, i humbly submit the following...
Date: Tuesday, February 1, 2022 10:02:55 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Planning Commission,

I'm a long time local forced into, and in all honesty relieved by, Airbnb'ing, when my industry (event production) was decimated by the response to the pandemic. I went into debt and finally took an SBA loan to get by and to help fund building an infrastructure to accommodate an Airstream trailer that I could rent out to get by. It's funny how I was living on the road in my car for over a decade mostly because there was no work here that would cover my basic expenses, and now that I have invested in my property and can sustain myself (with zero complaints by neighbors I might add) I'm on pins and needles daily waiting to see if those who have been elected to make decisions for the county on such matters are going to undermine my only source of income--now that I've managed to not only stop living in my car away from the home I built with my own hands, now that I've managed to escape the rut I was in with an industry that has treated me less and less like a person with any value over the years, now that I've managed to create an income that sustains not only me but others--like my cleaning people, contractors I've called upon to help with the things I was not qualified to do myself (solar panels), maintenance workers to keep the property working smoothly and repair things, never mind the other small local businesses that rely on our guests to sell their goods and services, and of course the county tax coffers that I proudly help fill now with something other than my property taxes.

As I said I am a long time local (about 16 years now) who has really loved living here through the last two decades when I was able to. And I really love living here now that I can full time. I do want mindful and fair regulations, especially those that will protect primary residence residents and our natural resources from the overwhelming influx of property investors, especially those who are behind corporate veils and those who've never lived here but are buying up any available land they can and pricing out locals from owning or renting, and just contributing to overcrowding in general. To continue unregulated wouldn't be sustainable or Fair to the pre-existing community, its values and identity . Too much of a good thing is going to go bad fast for sure in this case. Nobody came out here, traditionally, to "invest" in others coming out here. We mostly came out to be out of the urban sprawl and think and create and climb and run and star gaze and live with some space between us and our neighbors. Left unregulated, especially light and noise pollution, and the over building that's contributing to overcrowding, we will soon cease to be any different from any other high desert community. Of the following regulations that I hear are being fine tuned and considered, I humbly submit my quick thoughts for your consideration...

Permits Non-Tranferable: STR permits shall not be transferrable. New owner may use as an STR

provided that the unit has been permitted by a previous owner, there are no outstanding violations, and the new owner has applied for a permit

(Agree – seems to make sense all around)

STR of ADU: Only one STR shall be permitted on a single-family residential parcel. **(Disagree – disregards important factors like lot size and neighborhood density)**

Shared house: A portion of a dwelling unit may be permitted as an STR only if the dwelling is occupied by an owner or agent.

(Agree – but as opposed to what?)

Minimum Stay 2 nights: minimum of two consecutive nights with each booking.

(Disagree – overreaching and intrusive, this is to what end? If it's to curb party houses, establish event thresholds and respond to the infractions of those regulations and strip the hosts of their rights per incident)

30 Min Response by Phone: owner or agent shall be personally available by telephone on a 24-hours basis and maintain the ability to make contact by phone within 30 minutes and be physically present at the property within one hour.

(Disagree – this is for hosts, guests and Airbnb to decide. Poorly executed STR properties will be identified by neighbors and lose their rights per infraction/incident)

Annual Renewal: the proposal amends the permit renewal requirement from biannually to annually. **(Undecided)**

Occupancy Limits: based on the number of bedrooms and/or floor area. 2 adults per bedroom max. Shall not exceed 12 persons of any age.

(Agreed)

Daytime Visitors: limit of four daytime guests considering space available for guest parking.

(Disagreed – over reaching, again this is for hosts, guests and Airbnb to decide with poorly executed properties being identified by neighbors and receiving infractions that will eventually shut them down or curb their behavior)

Children Under 12: up to two minor children under the age of 12 may be added to the calculation of STR occupancy, but in no case shall the total occupancy exceed 12 persons of any age.

(this needs more consideration for couples with more young children. This seems over reaching and not well thought out).

Business Entity (Corporation): shall not be eligible to apply for a STR Permit. Existing permits may continue but are non-transferrable. **(Agree – but not strong enough. No grandfathering. Get rid of all business entities owning residences for STR purposes or otherwise, and maybe put some thought into how to help protect individuals owners from the liabilities that incorporating helps shield the others from)**

Limit 2 permits: limits the number of STR permits for an individual, trust, LLC or LLP to 2 permits
(Disagree – local residents whose primary residence is in the county should be able to build, buy and operate as many properties as they can free of any regulatory hindrances, why shouldn't they?)

Maximum Parking: limited to a maximum of one car per two permitted occupants or guests.
(Disagree – This doesn't take other important factors into account, like lot size and neighborhood density, etc.)

Must show Permit Number: Hosting Platform shall display the STR permit number
(Disagree – hosting platform should decide this)

Alternative Structures: "Means any shelter, vehicle or site prepared for transient occupancy rental other than a legal residential dwelling unit or commercial lodging facility. Examples include but are not limited to tents, recreational cabins and recreational vehicles." To provide clarification that STR regulations and permitting procedures do not apply to the rental of alternative shelters, as defined. The proposal clarifies that alternative shelters, as defined, are not eligible for STR permits and that the rental of alternative shelters may be authorized pursuant to a special use permit or permitted as a campground.

(Disagree – but willing to hear a productive debate on why these shouldn't be included as special cases within the STR regulations being considered)

Thank You For Serving Our Community,
A David Salko
Joshua Tree, CA
760-332-8369

From: [Blake Hodges](#)
To: [Planning Commission Comments](#)
Subject: Comments on Short Term Rental regulations for Feb 3rd meeting
Date: Tuesday, February 1, 2022 7:38:01 PM

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Similarly, we strongly oppose occupancy being limited by the number of bedrooms. This too should be a factor of square footage. A property with 40-acres should have many more options of occupancy than a 1000 square foot lot, regardless of the number of bedrooms.

These feelings extend to other proposed measures including parking restrictions.

Because so many communities in SBC, including ours, are comprised of vast large acreage parcels, **we believe the rules should be based around that amount of space, not hard set abstract numbers.**

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Other proposed regulations we are concerned about include the rules on the **Minimum Stay and Children Under 12** rule.

Regarding the Minimum Stay: what is the point on restricting potential income (and revenue for the county) as well as jobs (cleaners and contractors who handle these turnovers). More bookings is more money for SBC and its residents. Plain and simple.

While we do believe rules should be created to control short term rentals, we believe these rules should be implemented from as strategic of a position as possible. As responsible owners of a 40-acre parcel and 2 permitted listings, we feel we have a strong point of view from which to offer our opinions on these proposed rules.

Thank you for your time and thoughtful consideration,

Blake and Bea Hodges-Koch

2744 Watson Way
Twentynine Palms, CA
92277

(949) 412-1468
Blake@blakehodges.com
WildHeartRanchJT.com
@WildHeartRanchJT

From: [Edo Brizio](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Cc: [F Tosca D B](#); [Jackson Church](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 1:00:40 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Edward Brizio

Realtor / Home owner / 2 STR permit owner

<https://www.cheriemiller.com/agents/yucca/edo-brizio>

edobrizio@me.com

3103097770

From: [Sharon Dove](#)
To: [Planning Commission Comments; COB - Internet E-Mail](#)
Subject: SHORT TERM RENTALS
Date: Tuesday, February 1, 2022 5:14:49 PM

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Comments:

ZONING:

1). Why has SINGLE FAMILY HOME zoning been ignored and transient hospitality enterprises encouraged inside single family zoned neighborhoods.
Transient Occupancy Tax and County short term permits nullifies our single family home zoning.

Zoning is in place for a reason. Homes in neighborhoods vs. motels.

Move these transient rental operations to motel/hotel zoning.

DENSITY

2). Why in the world would you encourage high density usage on larger parcels.

There are large scale events being held in neighborhoods. How unfair.

NOISE AND MUSIC COMPLAINTS

3). Please RESEARCH THE NOISE AND MUSIC COMPLAINTS TO THE SHERIFFS

Dept. the county enforcement is profoundly inadequate and ineffective.

What a price for residents to pay in order to allow motel and event activity-no sleep!

HOUSING SHORTAGE

4). There is a shortage of affordable full time housing ... look no further than the short term rental market that takes inventory off the market for full time residential purchases and leases.

Inconvenient truth.

BUILDING CODES AND ADA COMPLIANCE

5).Do building codes and ADA requirements apply? Safety and accessibility.

Sharon Dove

Morongo Valley

From: [The Sunburst House](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 12:51:00 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello SB County Planning Commissioners & Board of Supervisors,

I'm a single mom who owns a small house in Joshua Tree. I spend about 40% of the year there, and rent it out as a STR otherwise.

I'm glad that you are taking up some serious issues with short term rentals, and I have read your red-lined document, and would like to share my feedback for your consideration:

AGREE on ENFORCEMENT, but it's not happening! At all! I personally know of close to 20 illegally operating STR's as single family homes, RVs, yurts etc. On Airbnb too!
SO PLEASE ACTUALLY ENFORCE those not permitted!

AGREE: it's insane corporations and developers are able to come in and buy up so many homes! NO CORPORATIONS!! NONE
And NO MORE THEN 2 HOMES PER PERSON!

And PLEASE stop the glamping sites! How can it be ok for them to come in with light pollution, noise pollution, bulldoze the land etc...?!!

ADD there should be a strict STR cap! Otherwise a majority of homes in neighborhoods will become an STR!! It's getting out of control, and this indeed needs regulation- like Hawaii and elsewhere does!

ADD that new construction for STRs be LIMITED! New homes are coming up, 2 stories, completely over scale, and blocking other's views and that's wrong! But everywhere I look another has been green-lit.

AGREE: on the amount of people per bedroom. Makes sense. But OPPOSE the limit of cars! My STR is permitted for 4 people, and my property holds 4 cars. Why wouldn't this be allowed? It doesn't impact neighbors or street traffic!

OPPOSE: MINIMUM STAY

I oppose the proposed change to two night minimum stay. I have many 1-night stays, and prefer them, as people arrive after 3pm, and are out by 10am meaning LESS TIME to hang out and party! JT is the perfect place to spend just one night, and one night stays puts more money in the pockets of local cleaners!

OPPOSE: the 30 MINUTE RESPONSE BY PHONE is unreasonable!! You can't even get a hold of the cable company in 30 minutes!!

Nor will water services or Edison do anything in under a day!! And what about lack of service?? If hosts don't respond, they'll go out of business. This is over regulation which is totally unreasonable.

When making these decisions, please consider the difference between the mom and pop owners vs corporations and developers!! Please also consider the difference between the desert, and the mountains.

Thank you very much for your consideration,
Dara Lasky
TheSunburstHouse@yahoo.com

310-804-8049

From: [Robert Brada](#)
To: [Planning Commission Comments](#)
Cc: [David McAdam](#); [Mollie B. Casey](#)
Subject: Comments on Draft STR Ordinance Update
Date: Tuesday, February 1, 2022 6:03:35 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I am one of the owners of Homestead Modern. We are the largest professional manager of short-term rentals in the High Desert, and we again support the proposed STR code amendments as we believe they will make the industry better for all involved.

We do have two areas where we believe the amendments should be clarified.

First, the section entitled “(c) Operation During Application Process” has been amended to apply only to applications for renewals of STR permits following a sale. Because the STR permit approval process is often lengthy, and the timing is outside of the control of the applicant, we believe that the County should continue to allow people who have filed for permits to operate in good faith while their application is pending. Given how many people are operating in bad faith without even applying for permits, this feels entirely fair.

Second, the section entitled “(h) Call Response” is vague as to who the caller is that we are to be responsive to and what type of complaints require immediate, on-site reaction. If this refers to calls from the County’s 24-hour hotline to the STR permit holder, then it makes sense that the issue has been vetted to be important. But if it is intended that anyone could call the STR permit holder with any complaint, then there should be some reasonableness standard regarding what type of problem requires immediate attention. We assume the intent is to shut down late-night parties or other nuisances, which we all agree is important. However if, for example, a neighbor calls at 3 AM to complain that an extra car is parked at the home when everyone is in bed, we do not believe it is reasonable (let alone safe) to send someone out to confront the guest when it can be dealt with in the morning.

I am hopeful that the commission can address these areas to provide some common sense clarity.

Thank you

Robert Brada

**H O M E S T E A D
M O D E R N**

Engage the High Desert
with Homestead Modern as your guide

www.HomesteadModern.com

Instagram: @homesteadmodern

From: [Patty Hume](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: Comments on STR redline from the Desert Region
Date: Tuesday, February 1, 2022 11:15:26 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planning Commission & Board of Supervisors—

I want to express some concerns I have about the proposed redline changes to SB County STR ordinance would impact the Desert Region.

My husband and I live in unincorporated 29 Palms and have 3 STRs in the hi desert. We are currently in the process of renovating a rural 5 acre house we plan to STR.

This is a very large county that is mostly rural desert. The ordinance must not be written to focus only on urban situations (Big Bear, etc.).

Much of this vast 20,000 acre county is rural desert. We have our own unique challenges and assets as an STR region. Most of our parcels are large and the population is thinning spread out. We don't have parking and traffic issues. Our vacation rental guests are primarily people coming to hike in the national park.

In my opinion there should be different STR rules in the Mountain region and the Desert region.

But the county has preferred to try to lump together 2 very different places into one set of rules.

If this is how the county wants to operate, many of these rules MUST have exceptions or allowances for larger parcels.

ADU

My husband and I recently spent over a year legalizing out guest house of our Joshua Tree property into a ADU. It is an important part of our retirement plan. It has a separate STR permit from the main house. They are on a 2.5 acre lot. It was a substantial amount of work, effort and cost to legalize this structure, meet the energy codes and qualify for an STR permit. We just completed this work a few months ago so it is extremely concerning that the proposed redline suggests that ADU will not be allowed a separate permit. We should be encouraging the building of ADU's and the repurposing of older buildings.

I believe that large properties over 2 acres, like ours, should be allowed to continue to have a second STR permit for their ADU.

We have neighbors on smaller lots adjacent to us, and each of them is allowed to have an STR permit. We would be at same or lower density that their properties.

At the very least, properties like ours, with 2 legal STR permits on one lot (over 2 acres) should be continued to operate under a non-confirming use permit.

30 MINUTE RESPONSE TIME

This is too short a period of time and should be 60 minutes. Most of the time I can be reached right away. But there are times like when I'm at the dentist getting a filling drilled that I might not be available over the phone for more than 30 minutes. In Joshua Tree I frequently drive through areas where there is low or no phone reception for periods of time.

OCCUPANCY LIMITS

The occupancy limits proposed are too strict and do not make sense in a rural area.

Because land was historically inexpensive, the desert region has many large, sprawling houses that have 1 or 2 bedrooms.

- My husband and I own a 2 bedroom house in JT that is 2300sf on a 2.5 acre property. In addition to the two bedrooms, there is a large loft sleeping area, a library, 2 dens and a large living room. It is currently permitted for 16 people, although the max we rent it for is 8 people. The proposed code would allow it to sleep 4 people.
- Our home in 29 Palms is 1800sf and 2 bedrooms but it also has a large living room and den that can be used for sleeping.
- In both cases the proposed code says these large houses would sleep max 4. The same as a tiny 800 sf 2 bedroom house on a small lot. That just doesn't make logical sense.
- I believe occupancy rates should be based on square footage as they currently are and not on bedroom count.

CHILDREN UNDER 12

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

LIMIT 2 PERMITS

My husband and I currently have 3 vacation rentals in the desert region and we are 1/4 through renovating a 4th house. I am very concerned that the house we are currently renovating (on 5 acres) most likely will not be finished in time to qualify for a STR permit.

- A limit of (4) permits per person would be a more reasonable limit for a rural region that is in need of investment.
- At the very least, houses that are currently under construction or having major renovations (permitted) should be grandfathered in and allowed to begin the permitting process.

MAXIMUM PARKING

- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. Saying that 4 people staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times our guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

Thank you,

Patty Hume

420 El Bandito Way
29 Palms, CA
213-840-4481

From: [Mark Johnston](#)
To: [Planning Commission Comments](#)
Subject: Comments Regarding Proposed Changes To The Current San Bernardino County Short Term Rental Ordinance
Date: Tuesday, February 1, 2022 11:59:43 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

I currently have 4 STR permits in the Desert region.

I believe it would be helpful if you could explain what SPECIFIC issues with STRs currently operating in the Desert region the proposed changes are intended to address. The draft document includes only the vague justification “We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities” One could argue that the identity of the Desert region, specifically Joshua Tree, is now that of a tourist destination offering an abundance of STRs that allow visitors to experience the physical and historical character of the Desert region in a variety of unique lodging settings.

Nonetheless, while it is likely that each of the proposed changes is in response to complaints received through Code Enforcement about STRs it is unlikely that the complaints regarding Desert and Mountain region STRs are similar as there are significant differences between the regions. Notably, there are significant differences in density and development history between the regions. Parking is never a problem in the desert. The Desert region has very few hotels and motels. Parcels are bigger and neighbors are further apart. As such it is unclear how a single STR ordinance can address the issues of both the Desert and Mountain regions of the unincorporated areas.

I have a few questions/comments indicated in CAPS below which hopefully can be addressed in the public discussion or taken into account in further discussions of these proposed changes.

§ 84.28.030 Definitions.

(c) BUSINESS ENTITY. Means a corporation, partnership, or other legal entity that is not a natural person. A business entity shall not include a natural person, personal or family trust, limited liability company (LLC), or limited liability partnership (LLP) consisting solely of natural persons. Notwithstanding this exception, a natural person, a trust, LLC or LLP consisting solely of natural persons that proposes to own and operate more than two STR units shall be considered a business entity for purposes of this Chapter.

SO BY THIS DEFINITION, IT WOULD IMPLY THAT A NATURAL PERSON THAT CURRENTLY HAS 4 STR PERMITS CURRENTLY WOULD HENCEFORTH BE CONSIDERED A BUSINESS ENTITY CONSISTING SOLELY OF NATURAL PERSONS.

§ 84.28.040 Permit Required.

A business entity as defined herein shall not be eligible to apply for an STR permit. (1) A business entity that holds an active STR permit on the effective date of this ordinance shall be eligible to renew the STR permit as a legal non-conforming use.

The legal non-conforming status shall not be transferrable to another business entity, and cannot be transferred to another property.

SO WHILE A BUSINESS ENTITY CANNOT APPLY FOR NEW STR PERMITS NOR TRANSFER THEIR EXISTING PERMITS THE CURRENTLY HELD STR PERMITS CAN BE RENEWED AS A LEGAL NON-CONFORMING USE. THIS WOULD IMPLY THAT ME, A NATURAL PERSON, WITH 4 CURRENTLY HELD STR PERMITS, TO RENEW THESE PERMITS AS A BUSINESS ENTITY BUT OBTAIN ADDITIONAL PERMITS NOR TRANSFER THE CURRENT PERMITS TO ANOTHER PERSON OR PROPERTY.

THIS IMPLIES THAT EXISTING PERMITS ARE GRANDFATHERED IN. AM I UNDERSTANDING THE INTENTION OF THIS LANGUAGE CORRECTLY?

§ 84.28.050 Application Process.

(g) Permit Renewal. The STR permit shall be renewed annually. Permit renewal shall be approved if the current conditions of operation and other standards in this Chapter have been met, the subject property passes the renewal inspection, and the applicable renewal fee as set forth in the San Bernardino County Code schedule of fees is paid. Renewal payments submitted after permit expiration are subject to a delinquent fee pursuant to the schedule of fees. Continued use of an STR is prohibited following permit expiration until renewal payment, including any delinquent fee, has been received by the County. Failure to submit renewal payment within 45 days of permit expiration, including any delinquent fee, shall result in expiration of the STR permit. The STR owner shall be required to submit a new application, pay the applicable new permit application fee, and be subject to the application process as set forth beginning in Subsection (a) above.

IT IS UNCLEAR WHY THE COUNTY WOULD WANT TO INCREASE THE BURDEN ON THEIR RESOURCES BY GOING TO ANNUAL PERMIT RENEWALS. HOW DOES THIS BENEFIT THE COUNTY, STR OWNERS, OR “REINFORCE THE PHYSICAL AND HISTORICAL CHARACTER AND IDENTITY OF OUR UNINCORPORATED COMMUNITIES”?

§ 84.28.060 Occupancy Standards

(b) Occupancy Limits. Occupancy limits per room for all STRs shall be determined as follows: (1) Occupancy limits shall be determined based on the number of bedrooms in the STR, a maximum of two people per bedroom. The number of bedrooms will be verified using County Assessor data and County building records. Example occupancies: a. Two-bedroom STR: four occupants b. Three-bedroom STR: six occupants c. Four-bedroom STR: eight occupants d. Five-bedroom STR: ten occupants

IT IS TYPICAL FOR HOTEL ROOMS TO HAVE 2 QUEEN BEDS AND ALLOW 4 PEOPLE IN A HOTEL ROOM WHICH MAY BE AS SMALL AS 300 SQUARE FEET.

WHY USE A PERSON PER BEDROOM LIMIT? WHAT ABOUT BUNKBEDS? I BELIEVE THAT YOU WILL FIND THAT MOST OPERATORS OF STRs ARE JUST AS INTERESTED IN LIMITING OCCUPANCY AS THE COUNTY. IT DOES SEEM THAT SQUARE FOOTAGE OF THE DWELLING SHOULD BE TAKEN INTO ACCOUNT. SHOULD A 2500 SQUARE FOOT 2 BEDROOM HOUSE HAVE THE SAME OCCUPANCY LIMIT AS A 700 SQUARE FOOT 2 BEDROOM HOUSE. WHAT SHOULD THE OCCUPANCY LIMIT BE ON A 1000 SQUARE FOOT "LOFT-STYLE" DWELLING WITH NO FORMAL BEDROOM?

(2) Maximum STR Parking. On-site parking shall be limited to a maximum of one car per two permitted occupants or guests. The maximum number of cars will be noted on STR permit information, along with the maximum numbers of occupants and guests.

THIS MAKES NO SENSE. IF AN STR HAS 4 PARKING SPACES AND JUST 2 BEDROOMS HENCE MAXIMUM OF 4 GUESTS THEN IT STILL SHOULD ALLOW FOR 4 CARS TO PARK IN THE 4 PARKING SPACES. IS THIS INTENDED TO MINIMIZE TRAFFIC OR WHAT?

§ 84.28.070 Conditions of Operation.

(b) Minimum Rental Period. The STR owner shall rent the STR for a minimum of two consecutive nights with each booking.

THIS SEEMS TO BE INSERTED ONLY AS A PLACATION TO HOTEL/MOTEL OPERATORS WHO HAVE NO SIMILAR RESTRICTION. IT CERTAINLY HAS NO IMPACT ON THE "PHYSICAL AND HISTORICAL CHARACTER AND IDENTITY OF OUR UNINCORPORATED COMMUNITIES" WHETHER AN STR GUEST STAYS FOR 1 OR 2 NIGHTS.

(d) Registration. The STR owner, as defined in § 84.28.030(g), shall administer registration prior to allowing occupancy of the STR. The registration shall include review of the STR regulations with at least one adult renter of the STR. At the time of such registration, the renter shall be provided a complete written or digital copy of the rental unit rules and requirements of the STR permit and applicable regulations, as well as disclosure of the penalties associated with violations. The registration material shall advise the renter of the occupancy, guest and vehicle/parking limitations, responsibility to avoid nuisance behavior, and for prohibition of commercial activity, as described in Subsection (a) above. The registration material shall contain a space for an acknowledgement to be signed by the renter and retained in the STR owner's records. as having read, understood and agreed to all provisions. Registration materials shall be preserved for the term of the STR permit, and shall be provided to the County, when requested, to confirm compliance with STR permit conditions of operation and regulations set forth in this Chapter. If the owner fails to provide adequate directions to the unit or fails to confirm acknowledgement and understanding of the rental unit rules and STR regulations, the conditions of operation of the STR permit may be amended by the County to require in-person registration.

AS THE COUNTY IS HOLDING THE STR OWNER RESPONSIBLE FOR ANY INFRACTIONS BY THE STR GUEST IT IS CERTAINLY IN THE OWNER'S INTEREST TO INFORM THE GUEST OF THE RULES. IT DOES NOT, HOWEVER, MAKE ANY SENSE FOR THE COUNTY TO ASK FOR RECORDS OF THIS UNLESS THE COUNTY

WOULD TAKE THESE RECORDS INTO ACCOUNT IN ANY HEARINGS RELATED TO A VIOLATION.

IT WOULD BE HELPFUL TO HAVE THE COUNTY PROVIDE SPECIFIC VERBAGE FOR “A COMPLETE WRITTEN OR DIGITAL COPY OF THE RENTAL UNIT RULES AND THE STR PERMIT AND APPLICABLE REGULATION, AS WELL AS DISCLOSURE OF THE PENALTIES ASSOCIATED WITH VIOLATIONS.” SURELY THE COUNTY IS NOT EXPECTING THAT THE STR OWNER GO THROUGH THE ENTIRE, RATHER CONFUSING, STR ORDINANCE DOCUMENTATION WITH THE STR GUEST. IN THE ABSENCE OF STANDARDIZED VERBAGE FROM THE COUNTY IT WILL BE IMPOSSIBLE FOR THE STR OWNER TO DEMONSTRATE THAT THEY PROVIDED THE REQUIRED INFORMATION TO THE GUEST THEREBY SATISFYING THE DEMANDS OF THE COUNTY.

Call Response. (1) The STR owner or agent shall be personally available by telephone on a 24-hour basis and maintain the ability to make contact by phone within 30 minutes and be physically present at the property within one hour in order to respond to and remedy complaints regarding the condition or operation of the unit or the behavior of persons on the property in violation of this Chapter or other law.

IT IS IMPRACTICAL TO SUGGEST THAT AT ALL TIMES AN STR OWNER MAY BE ABLE TO RESPOND WITHIN 30 MINUTES. WHAT IF OUT OF CELL RANGE? IN A MOVIE THEATER? ON AN AIRPLANE? IN A MEETING? LITERALLY NOBODY IS ABLE TO RESPOND WITHIN 30 MINUTES 24/7/365. SIMILARLY, BEING ON-SITE WITHIN ONE HOUR IS NOT POSSIBLE AT ALL TIMES. DOES THIS MEAN THAT AN STR OWNER CAN NEVER GO FURTHER THAN ONE HOUR AWAY FROM THEIR STR. THIS IS SIMPLY IMPRACTICAL.

(i) Responsibilities of Owner to Prevent Nuisance Behavior and Maintain Neighborhood Peace and Quiet. The owner shall take all lawful action necessary to ensure that renters and occupants abide by the terms of this Chapter and other applicable provisions of the County Code and law. The owner must inform renters and occupants that they are not to violate any noise standards, parking standards, or otherwise create a public or private nuisance.

IT WOULD BE HELPFUL TO HAVE THE COUNTY PROVIDE SPECIFIC VERBAGE FOR INFORMING RENTERS OF “THE TERMS OF THIS CHAPTER AND OTHER APPLICABLE PROVISIONS OF THE COUNTY CODE AND LAW.” AND ALSO VERBAGE SUFFICIENT TO “INFORM RENTERS AND OCCUPANTS THAT THEY ARE NOT TO VIOLATE ANY NOISE STANDARDS, PARKING STANDARDS, OR OTHERWISE CREATE A PUBLIC OR PRIVATE NUISANCE.” IN THE ABSENCE OF STANDARDIZED VERBAGE FROM THE COUNTY IT WILL BE IMPOSSIBLE FOR THE STR OWNER TO DEMONSTRATE THAT THEY PROVIDED THE REQUIRED INFORMATION TO THE GUEST THEREBY SATISFYING THE DEMANDS OF THE COUNTY.

§ 84.28.110 Hosting Platform Requirement.

(b) Subject to applicable laws and procedures provided in § 84.28.080(c), when requested by the County, a hosting platform shall disclose, in a commonly used electronic format, the

address of each short-term residential rental unit within the unincorporated San Bernardino County listed on the hosting platform, the names of the persons responsible for each such listing, the address of each such listing, the length of stay for each such listing and the price paid for each stay.

THE STR OWNER HAS NO CONTROL OVER THE HOSTING PLATFORM. IT WOULD BE NECESSARY FOR THE COUNTY TO INDICATE TO THE STR OWNER WHICH HOSTING PLATFORM(S) DOES OR DOES NOT COOPERATE WITH THE COUNTY SO THAT THE STR OWNER COULD CHOOSE A HOSTING PLATFORM THAT IS ACCEPTABLE TO THE COUNTY.

Thank you for your time and consideration.

Sincerely,

Mark Johnston
6812 Saddleback Road
Joshua Tree, CA 92252
autoidexpert@sbcglobal.net
323-652-9462

From: [Emmanuel Ruggiero](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 1:57:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional

guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

Thank you for your consideration,

Emmanuel Ruggiero

61750 Desert Air Rd, Joshua Tree, CA 92252

manu@helpiz.com

4242489748

From: [Nick Lanza](#)
To: [Planning Commission Comments](#); [Biggs, Lupe](#)
Cc: [Supervisor Rowe](#); [Supervisor Rutherford](#)
Subject: Development Code Amendment re: Short Term Residential Rentals
Date: Tuesday, February 1, 2022 12:58:25 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

TO Planning commissioners

FR: Nick Lanza, President, BBVRA

RE: Development Code Amendment re: Short Term Residential Rentals

Honorable Planning Commissioners,

Big Bear Vacation Rental Association (BBVRA) represents Vacation Rental Owners and Agencies in Big Bear Valley. After reviewing the proposed Development Code Amendment re: Short Term Residential Rentals, we respectfully submit the following comments:

- **Mandatory 2 night minimum rental - This will prohibit visitation by couples and families that cannot afford the time or money to rent for 2 nights.** Many couples and families have only enough money to rent for one night, especially for their first visit to the mountains. This requirement will stop many couples and families from 'discovering' the natural mountain environment for the first time. Couples and parents work Monday - Friday, and a trip to Big Bear on Saturday with a one night stay Saturday night, is all they have time for and often, all they can afford. **Do not prohibit these couples and families from discovering what Big Bear's outdoor environment can offer.**
- **Occupancy Limitations -**
 - **In addition, up to 2 minor children under the age of 12 -** Many families traveling for their vacation have children over the age of 12. For example, a Mother and Father, Grandma and Grandpa, and 2 children ages, 17 and 13 years old can currently rent a 2 bedroom home with a foldout queen sofa. Restricting the 2 additional children to be "under the age of 12" significantly restricts the ability of families to vacation in Big Bear. If all the occupants of the STR are relatives, what difference does it make how old they are - ***IF*** they meet all the other requirements and they ***ARE*** well behaved?
 - **Maximum occupancy of 12 guests -** There are some homes that have more than 5 bedrooms, are in excess of 3,000 sf and are on a parcel larger than one-half acre. There should be a mechanism in the STR Ordinance to allow for occupancy greater than 12 guests in such situations - so long as they meet all the other requirements.
 - **Maximum of 4 daytime guests -** Once again, for very large homes on very large parcels with very adequate parking, there should a mechanism in the STR Ordinance to allow for daytime guests greater than 4 guests in such situations.
- **Good Neighbor Information -** We agree that this is an important item that should be

presented, explained and the guest should sign / initial their receipt and agreement to abide by all policies and regulations of the County. Compliant Guest behavior is critical to assuring our neighborhoods are not disturbed.

- **Fyi**, § 84.28.050 Section (f) has the statement: "has not complied with one or more requirements of §§ 84.28.060(b) through (d), or § 84.28.070". Our review could not locate a Section 84.28.060(d).

Thank you for the opportunity to provide you with our comments and concerns.

Sincerely,

Nick Lanza, President

From: [Kathryn Winslow](#)
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 2:12:56 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- **many of the these rules MUST have exceptions and allowances for larger parcels!**

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits. At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Kathryn Winslow
4500 Desert Flower Ave,
29 Palms, CA 92277
323.371.8028

From: [Peo Haggstrom](#)
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 2:28:54 PM

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Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is a rural desert.

The vast desert region of SB County is NOT Palm Springs, Big Bear, or have the STR challenges of an urban, small-parcel town or city.

Our own parcel is 5 acres big.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife areas or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

ALTERNATIVE STRUCTURES

We are not opposed to some kind of limit of alternative structures but if one has 1-3 RVs or nicely decorated trailers to rent out on their 2.5-5 acres property they should be allowed to do so legally without having to get a permit to operate as a campground. A campground should be considered something completely different. Also if an SFR is located on the same parcel

with the host available to assist this should not be a problem. A campground should be considered something different than a decorated trailer / RV with hosts nearby.

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise, the outcome is absurd, for example, an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel. We reside on 5 acres, there should be room for at least 2 or 3 STR permits.

MINIMUM STAY

I oppose the proposed change to two-night minimum stay.

Many well behaved visitors can spend only a single night in the Hi-Desert as one stop on a longer trip. In addition to shortchanging visitors, housekeepers would see reduced work if single-night stays were eliminated. At a minimum, if any change regarding the length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts, we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert, most parcels have room to park many cars. Parking is really not a concern unless you are in a village.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time, it should be longer. What if a guest is calling in the middle of the night?

Thank you for your consideration,

Peo Haggstrom

56495 Cedarbird Road

peo@ditchplanet.com

323-205-0033

From: [Pamela Goodchild](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 2:53:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Greetings San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting in two days on Feb 3rd, 2022. We are a strong community and have built a pretty incredible vacation place where none existed. We'd all like to see it stay I would think! Please see my comments below...

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>.5 acre) should be permitted 2 to 4 additional

guests than homes on small parcels (<.5 acre).

- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR, this is being encouraged and passed to accept by the State of California.
 - On large (>.5 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated and bookings would be reduced, therefore San Bernadino Taxes from income would reduce, we need it!
 - At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed, but again I very much strongly disagree and see no benefit to our community what so ever.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule. I also disagree as this discourages families to visit.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done, and, there is no ruling for long term renters or owners, unmanageable rule.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual.
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of Non-transferability of STR permits and the county itself

- STR OWNERSHIP
 - Limiting STR ownership to 2 STR permits per person for a period of 2 years from

now (to revisit in 2024). And to revoke and cease ownership to businesses of any kind, limiting STR's to be solely owned by people that are in residential neighbourhoods, excluding Commercial Properties.

- RESIDENTIAL PURCHASING OF PROPERTY (this is my bonus 2 cents, thank you for listening)
 - I approve of residential properties purchased in the Morongo Basin be limited to persons, not corporations or businesses of any kind, to only allow Corporations to purchase commercially rated properties.

Thank you for your consideration,

Kindly,
Pamela

Pamela Goodchild
62575 Barbara Lane
Joshua Tree, CA 92252
pamelagoodchild@mac.com
323-445-1035

From: [Stevie Yates](#)
To: [Supervisor Rowe](#); hello@joshuatreevra.com; [Planning Commission Comments](#)
Subject: Fwd: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:43:39 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

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The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

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MAXIMUM PARKING

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30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Stevie Yates

4355 Kickapoo Trail

Landers, CA 92341

310-750-7697

From: [Peo Haggstrom](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:12:21 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

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The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

ALTERNATIVE STRUCTURES

We are not opposed to some kind of limit of alternative structures but if one has 1-3 RVs or nicely decorated trailers to rent out on their 2.5-5 acres property they should be allowed to do so legally without having to get a permit to operate as a campground. A campground should

be considered something completely different. Also if an SFR is located on the same parcel with the host available to assist this should not be a problem. A campground should be considered something different than a decorated trailer / RV with hosts nearby.

OCCUPANCY

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Otherwise, the outcome is absurd, for example, an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel. We reside on 5 acres, there should be room for at least 2 or 3 STR permits.

MINIMUM STAY

I oppose the proposed change to two-night minimum stay.

Many well behaved visitors can spend only a single night in the Hi-Desert as one stop on a longer trip. In addition to shortchanging visitors, housekeepers would see reduced work if single-night stays were eliminated. At a minimum, if any change regarding the length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

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30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time, it should be longer. What if a guest is calling in the middle of the night?

Thank you for your consideration,

Peo Haggstrom

56495 Cedarbird Road

peo@ditchplanet.com

323-205-0033

From: [Sati Ah](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:35:28 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Thank you in advance for your time, and please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

- ~ The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
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- ~ The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

- ~ We are thinly populated.
- ~ We have plenty of parking on most of our properties.
- ~ We are spread out and don't have much traffic congestion.

- ~ Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- ~ The county is attempting to shoehorn two very different areas into a single set of STR rules.
- ~ If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

- ~ Occupancy should continue to be based on habitable square footage, NOT bedroom count. Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom. Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

~ at minimum, STR occupancy should match state requirements for LTR at two people per room plus one.

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

~ The county should encourage construction of second units and allowing them to be a STR in addition to a main house STR. On large (>2 acre) parcels both a home and second unit should continue to be allowed STR permits.

~ At a minimum, existing properties with 2 STR permits for both house and second unit must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

~ Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

~ In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

~ At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

~ As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

~ In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

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YEARLY RENEWAL OF PERMIT

I oppose the proposed change to make the renewal annual

~ Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

Business Entity (Corporation)

I oppose the proposed change to not allowing entities to apply for permits.

~ Many people hold their property in LLC in which the managing partner is their trust, doing so as advised by their Trust lawyers.

Limit 2 permits

I oppose the change to limit the number of STR to two.

~ Out of love for the desert, and my wish to support the local community I have purchase not more than 4 distressed properties of which I remodeled and now hold STR permits for, as do many others. Not allowing these permits would reduce my ability to support my cleaning and maintenance staff.

~ at minimum, anyone who currently hold STR permits shall continue to hold them without acquiring more.

Thank you for your consideration,



Sati Ah

desertoasisrentals@gmail.com

310-779-0047

From: [Stevie Yates](#)
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:39:02 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Stevie Yates

4355 Kickapoo Trail

Landers, CA 92341

310-750-7697

From: [Stella Rubenstein](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@JoshuaTreeVRA.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:44:36 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
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The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

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The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

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Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

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At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

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Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Estelle Rubenstein

254 Eureka St

San Francisco, CA 94110

I lived in JT from 2013 until 2018. I had a BNB

From: [Lori Gresty](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 4:58:16 PM

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- **DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT**
- **There must be different STR rules or adjustments made for the Desert region versus the Mountain region.**
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT the more densely populated City of Palm Springs.
 - The vast desert region of SB County is NOT the more densely populated tourist-driven Big Bear region.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels and parcels that are owner-occupied.
- **OCCUPANCY**
 - **I oppose the proposed change in the occupancy calculation.**
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than

homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - **I oppose the proposed change which would limit STR permits to 1 per parcel.**
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house and Guest House/Casita STR, as is currently allowed.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - **I oppose the proposed change to two night minimum stay.**
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
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- 30 MINUTE RESPONSE BY PHONE
 - **I oppose the proposed change to phone response time.**
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. As one local healthcare worker noted: Healthcare workers dealing with life and death phone response situations are granted at least an hour to respond. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Lori Gresty

4630 Avenida del Sol, Joshua Tree

lorigresty11@gmail.com

702.373.3973

From: [Jonney Tang](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 5:24:46 PM

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Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,
Jonathan Tang

From: [Cindy Beck](#)
To: [Planning Commission Comments](#); [Cozad, Claire](#); [Reyes, Steve](#)
Subject: modifications to the SB County STR ordinance
Date: Tuesday, February 1, 2022 2:54:54 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Commissioners,

As a vacation rental homeowner/STR host of the last 12 years who loves and visits their Joshua Tree home every month, I commend and am glad to see the recent enactment and enforcement of regulations governing the rapidly expanding business of STRs in the Morongo Basin. Our family is very concerned about preserving and protecting the special and unique qualities of the hi-desert and our neighborhood that we cherish while at the same time we are grateful, appreciative and dependent on the retirement income that our STR provides us. I do believe a respectful balance can be achieved.

Regarding the proposed changes/improvements to the current ordinance I am generally IN SUPPORT of nearly all of them but do have a few concerns/comments:

- 1) Parking: The hi-desert doesn't have a parking problem, what we have is a road maintenance problem. The dirt roads in my neighborhood are privately owned and thus not county maintained. The increased vehicular traffic due to the rapidly increasing numbers of STRs that have been permitted in our neighborhood has caused an associated increase in road damages and required maintenance. This has caused undue and unfair financial burden on the minority of local residents and caring STR owners who have been voluntarily paying for road maintenance for all the non-paying property owners. We have no authority to mandate contributions to our road fund and with the growing percentage of distant STR property owners who never travel on our roads, the likelihood that we can reach the required percentage of homeowners to agree to a tax assessment to turn over our road maintenance to the county is diminishing. I know this is a problem all over the desert. How can this problem be resolved?
- 2) Response time: The ability to respond to problems/issues at an STR in Big Bear where the homes are tightly concentrated in a small area are significantly different from the ability to respond in the desert where homes are much more distant from each other and where cell reception is often spotty or even absent in some areas. I feel a distinction should be made between the mountain and desert regions regarding response time, with more time being allowed in the desert.
- 3) Nightly minimum: Although I do have a 2 night minimum requirement, I feel there should be some opportunity for visitors to have one night stays, especially near JTNP where many guests are just passing through.
- 4) Permit renewal: Yearly renewal of STR permits seems burdensome for everyone. Isn't that time consuming for staff? Why not keep renewals at 2 years?
- 5) Maximum occupancy: I'm not in favor of the proposal to allow 2 extra children under age 12 thereby allowing a property to exceed the otherwise allowable maximum occupancy. Do they sleep in the living room? Or some other area of the house that is not a bedroom? As far as noise and stress on hosts/owners and nearby residents, children of this age are some of the worst offenders lol (disclosure, I have 2 grand daughters ages 3 and 7). And as a host, age is difficult, and possibly illegal, to confirm.

I thank you for your time and consideration. With the current pace of investment in the business of STRs it is urgent that these regulations be put in place to ensure the preservation of the very qualities that we come here to enjoy.

Most sincerely,
Cindy Beck
8855 Neva Rd, Joshua Tree

From: nikita.ramsey
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 5:44:51 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
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- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
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 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
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 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
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 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
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- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

Thank you for your consideration,

Nikita Ramsey

4374 Bonita Ave, Yucca Valley, CA 92284

Sent from my iPhone

From: [Vickie Paulsen](#)
To: [Planning Commission Comments](#)
Subject: Newberry Springs STR
Date: Tuesday, February 1, 2022 1:43:44 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Greetings -

The Commission will consider changes to the Short Term Rental ordinance, most of which are fine and will be good for the communities in which the STRs are located.

I request that the Commission consider an exception to page 9, item (b) that states an STR minimum stay to be two nights. That may be fine for the mountain communities, Morongo, and Joshua Tree, but it is unrealistic for Newberry Springs. We do not customarily get guests who are vacationing here. Since we are halfway between Las Vegas, the Grand Canyon, and points east; and Los Angeles, San Francisco, San Diego, and points west, our guests simply want a comfortable place to stay overnight. If our BnBs were not available to these travelers, they might keep going, get drowsy, and cause accidents.

An exception for one-night stays is obviously important for drivers and public safety, since Newberry Springs is between Interstates 40 (aka Route 66) and I-15, both busy with travelers scurrying from one destination to another. Please do not hinder our Air BnBs by requiring two-night stays.

Thanks for your service -

Vickie Paulsen, Newberry Springs

From: [alex pels](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: Planning Commission Meeting Comment Feb 3 2022 Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 5:51:04 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

I am a long time short term rental owner in Joshua Tree, and I support ALL of the proposed changes ;-)

- Lowering capacity sounds great
- Limiting the number of STRs held by one individual or entity sound great
- I am not bothered by yearly recertification

Thanks for your consideration,

Alex Pels

62831 Overhill Road Joshua Tree CA 92252

310-709-2135

From: [Dharma Sound](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 6:26:55 PM

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San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is a rural desert.

The vast desert region of SB County is NOT Palm Springs, Big Bear, or have the STR challenges of an urban, small-parcel town or city.

Our own parcel is 5 acres big.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

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The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

ALTERNATIVE STRUCTURES

We are not opposed to some kind of limit of alternative structures but if one has 1-3 RVs or nicely decorated trailers to rent out on their 2.5-5 acres property they should be allowed to do so legally without having to get a permit to operate as a campground. A campground should

be considered something completely different. Also if an SFR is located on the same parcel with the host available to assist this should not be a problem. A campground should be considered something different than a decorated trailer / RV with hosts nearby.

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise, the outcome is absurd, for example, an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel. We reside on 5 acres, there should be room for at least 2 or 3 STR permits.

MINIMUM STAY

I oppose the proposed change to two-night minimum stay.

Many well behaved visitors can spend only a single night in the Hi-Desert as one stop on a longer trip. In addition to shortchanging visitors, housekeepers would see reduced work if single-night stays were eliminated. At a minimum, if any change regarding the length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts, we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert, most parcels have room to park many cars. Parking is really not a concern unless you are in a village.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time, it should be longer. What if a guest is calling in the middle of the night?

Thank you for your consideration,

Harout G.

Landers, CA

From: [Stella Rubenstein](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@JoshuaTreeVRA.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 3:44:36 PM

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We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Estelle Rubenstein

254 Eureka St

San Francisco, CA 94110

I lived in JT from 2013 until 2018. I had a BNB

From: [Tim Hainley](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 6:29:32 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife areas or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.

- Otherwise the outcome is unreasonable, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).
- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.
- MINIMUM STAY
 - I oppose the proposed change to a two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.
- MAXIMUM PARKING
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 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Oftentimes guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.
- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Timothy Hainley

7084 Sierra Ave.

Joshua Tree, CA

thainley@gmail.com

510-681-6637

From: meconverse@cox.net
To: [Planning Commission Comments](#)
Subject: public input to STR amendment
Date: Tuesday, February 1, 2022 5:11:49 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Project Description Applicant: County of San Bernardino Land Use Services Department

Community: Desert and Mountain Communities

Locations: Desert and Mountain Regions Project No.: PMISC-2020-00005

Staff: Irene Romero

Proposal: Development Code Amendment to add and amend various regulations to provide clarification and updates to Chapter 84.28 related to Short Term Residential Rentals

First, thank you for all your hard work in trying to solve the problems created by Short Term Rentals. I know it must be a difficult and daunting process to try to please all parties.

The current San Bernadino County Code of Ordinances regarding Short Term Rentals (Ch. 84.28.040) states that:

“An individual unit such as an apartment or condominium, located within a multi-family residential project, is **not** eligible for a STR residential rental unit permit.”

The Planning Commission is considering changing the policy regarding STR for condominiums and is asking for public comment.

There are many reasons, I believe, the current policy should stay in place. The very nature of a condominium complex is ill-suited for short term rentals. These concerns are specifically for a condominium complex in Lake Arrowhead, however they are likely true for others:

- The Staff Report states that one of the purposes of the amendments are to “reinforce the physical and **historical character and identity of the neighborhoods**”. Our small condominium complex has a history of friendly neighbors that knew each other and looked out for one another. However, with the increase in STR usage, it is fast becoming more consistent with an impersonal, hotel atmosphere.
- In a condominium complex, many utilities such as water and trash

removal are a **shared expense**. When some units are used as Short-Term Rentals the entire ownership ends up paying for these costs, in effect subsidizing the cost of STRs without benefit of compensation that the STR owner receives.

On a similar note, beyond normal wear and tear there is often **damage** incurred. Often, short term renters, not sharing the same pride of ownership, cause damage to the common area property. Again, the entire ownership ends up paying for the repairs needed.

- Regarding **noise**, the ordinance states:

(1) It is unlawful for any owner, renter, occupant, or guest located at a short-term residential rental unit to make, cause to be made, or allow to be made any loud, excessive, impulsive, or intrusive noise that disturbs the peace or quiet or that causes discomfort or annoyance to any reasonable person of normal sensitivities in the area.

In a condominium, walls and ceiling/floors are shared. In a situation where an upstairs unit is rented as a STR, even **normal household noise can be untenable** for the downstairs owners. When children are running around upstairs for hours at a time, the noise can cause extreme annoyance to anyone. One can complain about loud music, but it isn't easy to complain about kids just being kids.

- **Crime**—Having been previously on the board of our complex, I have sat on meetings where fines were levied due to dangerous criminal activities carried out in a unit by short term renters. In any neighborhood, a crime incident is very unsettling, but in a condominium complex, in such close proximity to your neighbors, crime can be especially threatening.

It is for these reasons; I would respectfully give my input for upholding the Current ordinance in regards to NOT allowing condominiums to obtain a permit for a Short-Term Rental.

I will reiterate: the very nature of condominiums makes them ill-suited for Short Term Rentals.

Thank you for your consideration in listening to the input.

Mary Converse

From: [Jody Hume](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 6:32:48 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

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 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.

least 30 minutes.

Thank you for your consideration,

Jody Hume

7084 Sierra Ave.

Joshua Tree, CA 92252

jody.hume@gmail.com

510-508-1915

From: [Hunter VurbEFF](#)
To: [COB - Internet E-Mail; Planning Commission Comments](#)
Subject: Re: San Bernardino County Short Term Rental Ordinance
Date: Tuesday, February 1, 2022 10:26:19 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

As a follow up, I just want to say that prioritizing the needs of local landowners should be paramount. No one is saying that we shouldn't slow down the STR wave but hurting the locals who are making a living from renting out two of their guest houses doesn't change anything but hurt those that you're trying to protect.

Both sides agree that locals who live on their property should have more rights and a different set of rules than people who live out of the area and rent out the property.

Let us have our 2 STR's, let us be good stewards on the property we bought in a rural unincorporated where the purpose of this zoning is to make money from your own land. Just as my neighbor can raise horses to make a living, I should be able to rent out the two structures on the property I live on.

We can have a win win result here. Curb non primary residents and make an exception to those who live on their property. Why do locals who live on their property, have to be the sacrifice?

Hunter VurbEFF
9621 Rawson Road
Morongo Valley, CA

Sent from my iPhone

> On Jan 31, 2022, at 8:03 PM, Hunter VurbEFF <hvurbEFF@gmail.com> wrote:

>

> Dear San Bernardino County Planning Commissioners and Board of Supervisors,

>

> Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

>

>

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>◦ At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

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>• CHILDREN UNDER 12

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>◦ I oppose the proposed regulation of guest children under 12.

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>◦ As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

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>◦ I oppose the proposed change to phone response time.

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>

>

>

> Thank you for your consideration,

>

> Hunter Vurbeff

> 9621 Rawson Road Morongo Valley

From: [Vanessa Wruble](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: Regarding Agenda Item 4 - STR Ordinance
Date: Tuesday, February 1, 2022 3:35:23 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

As a Morongo Valley resident, we have chosen to live rurally, in community with one another. We don't want our land to be hyper-regulated. We enjoy our privacy. We can handle disputes with our neighbors interpersonally. We don't need the county to come in and legislate us, how we live, and what we can (within reason) do on our own land.

We'd like to stress the following points:

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- There must be different STR and land-use rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We LIVE on the property that we have an STR.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife

area or 35 wilderness areas.

- The county is attempting to shoehorn two very different areas into a single set of STR rules.
- If we want to host a wedding or retreat on our own land, that should be up to our discretion, and we should not be penalized financially for it.
- There needs to be a carve out for owners who live on the property -- we are 100% different than folks with investment properties who have way less oversight.
- If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

Some Details:

- OCCUPANCY ISSUES

- I oppose the proposed change in the occupancy calculation.
- Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- LIMITS OF STR PERMIT PER PARCEL

- I vehemently oppose the proposed change which would limit STR permits to 1 per parcel.
- The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY

- I oppose the proposed change to two night minimum stay.
- Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
- In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
- At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- MAXIMUM PARKING

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- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

Thank you for your consideration,

Vanessa Wruble

9621 Rawson Rd

Morongo Valley, CA

92256

6464132513

vanessa@vanessawruble.com

From: [Spencer Kerrigan](#)
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 7:26:13 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

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The county is attempting to shoehorn two very different areas into a single set of STR rules. If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

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Thank you for your consideration,

Spencer Kerrigan

1951 Applegate

29 Palms, CA

spencerpkerrigan@gmail.com

(909) 556-8252

From: piperqdm
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 9:56:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

My husband and I have ran two airbnbs in unincorporated SB county YB/JT area for over seven years. We do agree that more regulation is good, but there are some things that absolutely should not change with the expectation that it will yield better results for anyone. In order of importance those are:

-two night minimums should not become the rule. In our experience one night guests are better than two night guests, they are often people passing visiting Palm Springs or LA and just want to come out for a day, the hi desert region isn't that big and too limit guests only to people who want or can afford two nights makes no sense and is also prejudiced towards people with less money or bigger families who can't afford a two night stay. Imagine how absurd it would be if JTNP only allowed visitors or campgrounds guests the ability to visit if they stayed at least two nights.

-the blanket rules for both rural parcels on 1+ acres and smaller parcels in residential areas is very problematic and we should

Be encouraging travelers who want to visit the hi desert to stay in the properties that are more spread out and less likely to bother neighbors! Not discouraging them by making properties on bigger parcels harder to operate or less valuable.

I personally think the high desert airbnb situation would be semi solved if only properties with a minimum 1 acre were rented out, and all the ridiculously small lots airbnbs in residential areas weren't allowed to operate period, but I can understand why that would be too limiting and anger too many people.

But in all seriousness, not letting a 2.5 or five acre property build a new ADU to be a STR rental which hopefully pushes already built STR in residential areas back into the local long term housing or sale market is a horrible idea, especially when

You then will issue STR permits to five properties on a quarter acre each in a row on a single residential block????

I have cut and paste the items from our local vacation rental association group I resonate the most strongly with.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

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 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

- I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.
- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.
 - MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done

Thank you for your consideration,

Piper Mavis
63852 singletree lane
joshua Tree , CA
92252
+ 1 (310) 570-9491
www.pipermavis.com

From: [Megan Cullen](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: STR ordinance recommendations
Date: Tuesday, February 1, 2022 8:15:34 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Oftentimes guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

TAKE DOWN THE PUBLIC MAP OF STR LOCATIONS - This only encourages thieves and endangers not only guests and hosts but local communities.

Thank you for your consideration,

Megan Cullen

Joshua Tree

424 324 4380

--

Megan Cullen

www.megancullenphoto.com

From: [Jared Jerome](#)
To: [Planning Commission Comments](#)
Subject: STR Public Comment 2/3/2022 PC Meeting
Date: Tuesday, February 1, 2022 7:44:58 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good afternoon/evening Commissioners and staff,

I am a resident of Flamingo Heights who lives on an unmaintained road, as many of us in the Desert Region do, and am a planning professional of 15 years (for better or worse...). I am writing in support of the staff recommendations, as written.

So-called "party-houses", properties doubling as event space, and other types of high occupancy rentals have serious social and environmental concerns that extend beyond typical neighbor complaints (e.g., trespassing, noise, uncontrolled events, etc.). Traffic is the primary driver of adverse environmental impacts. Traffic not only increases your typical emissions of AQ/GHG/noise, but also increases various liquid waste discharge (human waste, motor oil, gasoline, cooking oil, etc.), soil erosion, takes of endangered species, and so on. STRs are capable of generating substantially more trips than a typical SFR. Instead of 2-5 people living in a house, there can be 12-16 guests at a typical larger rental and up to several hundred at a bootleg event property? In addition to guests, STRs generate traffic from cleaning crews, property managers, repair people, etc. In a region already struggling to address water quality and protection of protected/endangered species (Joshua Trees, Desert Tortoise, etc.), it makes sense to regulate in a way that considers those resources.

The State and country are in the midst of a housing crisis. Short-term rentals remove housing stock from the long-term rental market and exacerbates this shortage. This is detrimental to middle and lower income households, and particularly less advantaged groups who are going to suffer greater impacts from downstream issues. Creating a part-time low-paying job for a freelance cleaner who can't afford to live locally is not helping the economy. Having affordable housing stock with well-regulated short-term accommodations (motels, hotels, etc.) located along maintained engineered roadways is significantly more beneficial to the economy and residents in general.

To reiterate, I believe staff did a bang-up job of the revisions to the ordinance and I support staff recommendations as-written. I don't believe that STRs are something that should be an unpermitted use altogether, but they should be regulated in a manner consistent with the impacts they generate. It is my hope that the Board of Supervisors will receive a recommendation that considers the aforementioned impacts. I also hope you all are able to escape this meeting before midnight :)

Thank you for coming to my Ted Talk,

-Jared Jerome

From: [Nanci Havens](#)
To: [Planning Commission Comments](#)
Cc: Supervisor.Rowe@bos.sbcountry.gov
Subject: STR
Date: Tuesday, February 1, 2022 1:10:22 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I strongly support all the regulations and feel that STR's have no place in residential neighborhoods. Thank you.
Nanci Havens

Sent from my iPad

From: [Miguel De Pedro](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Tuesday, February 1, 2022 9:56:26 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

My wife and I have ran two airbnbs in unincorporated SB county YB/JT area for over seven years. We do agree that more regulation is good, but there are somethings that absolutely should not change with the expectation that it will yield better results for anyone. In order of importance those are

-two night minimums. In our experience one night guests are better then two night guests, they are often people passing visiting Palm Springs or LA and just want to come out for a day, the hi desert region isn't that big and too limit guests only to people who want or can afford two nights makes no sense and is also prejudiced towards people with less money or bigger families who can't afford a two night stay. Imagine how absurd it would be if JTNP only allowed visitors or campgrounds guests the ability to visit if they stayed at least two nights.

-the blanket rules for rural parcels on 2+ acres and smaller parcels in residential areas is very problematic and we should

Be encouraging travelers who want to visit the hi desert to stay in the properties that are more spread out and less likely to bother neighbors! Not discouraging them by making properties on bigger parcels harder to operate or less valuable.

I personally think the high desert airbnb situation would be semi solved if only properties with a minimum 1 acre were rented out, and all the ridiculously small lots airbnbs in residential areas weren't allowed to operate period, but I can understand why that would be too limiting and anger too many people.

But in all seriousness, not letting a 2.5 or five acre property build a new ADU to be a STR rental which hopefully pushes already built STR in residential areas back into the local long term housing or sale market is a horrible idea, especially when

You then will issue STR permits to five properties on a quarter acre each in a row on a single residential block????

I have cut and paste the items from our local vacation rental association group I resonate the most strongly with.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.
- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.
- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.
- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done

Thank you for your consideration,

Miguel De Pedro

4619 Kickapoo Trail

Landers, Ca

92285

Migueldepedro79@gmail.com

619-817-1633

From: evelyn.swarengin
To: COB - Internet E-Mail
Subject: Vacation rentals
Date: Tuesday, February 1, 2022 7:02:00 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.
As a Morongo Valley resident, we have chosen to live rurally, in community with one another. We don't want our land to be hyper-regulated. We enjoy our privacy. We can handle disputes with our neighbors interpersonally. We don't need the county to come in and legislate us, how we live, and what we can (within reason) do on our own land.

We'd like to stress the following points:

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

There must be different STR and land-use rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We LIVE on the property that we have an STR.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules. If we want to host a wedding or retreat on our own land, that should be up to our discretion, and we should not be penalized financially for it.

There needs to be a carve out for owners who live on the property -- we are 100% different than folks with investment properties who have way less oversight.

If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

Some Details:

OCCUPANCY ISSUES

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

LIMITS OF STR PERMIT PER PARCEL

I vehemently oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration

Evelyn Hanna

10075 Sam's trail

Morongo Valley

Evelynssons@hotmail.com

7694497717

Get [Outlook for Android](#)

From: [Katherine England](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 1:18:56 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

As a short term rental host, please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

We have a unique situation at our permitted short term vacation rental. We have a Homestead cabin studio that has been converted to a SFR with permits. This space does not have a bedroom, but the occupancy is based on square footage.

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.
The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.
Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.
As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.
At our unique space, it is very common for two adult friends to drive separately from two different parts of the country. Because we do not have an actual bedroom the proposed ordinance parking would not work in our situation.
In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.
Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,
Katherine England
63434 Tilford Way
Joshua Tree, CA
92252
Katherineengland@hotmail.com
303-521-7227

Sent from my iPhone

From: [Planning Commission Comments](#)
To: Emscpasbca@aol.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 9:29:46 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Eric Schenker
3324 State Street # F
Santa Barbara, California 93105
8057055868
Emscpasbca@aol.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: In order to accommodate a 5 person family, please allow 5 people in a two bedroom when there are enough beds to accommodate 5 sleeping in two bedrooms. In order to accommodate two 4 person families, please allow 8 people in a three bedroom when there are enough beds to accommodate 8 sleeping in three bedrooms. In our home, we often have this type of situation. The parents each get their own bedroom and the 4 kids sleep in their beds in the third bedroom. Thank you for your consideration. Eric Schenker available

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Bill Gallen](#)
To: [Planning Commission Comments; +Supervisor.Rowe@bos.sbcounty.gov](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 7:41:04 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

As a longtime property owner in Joshua Tree, and a permitted STR operator, I support more strict oversight of STR's generally and rural STR's in particular. I understand the negative impact STR's have on full-time residents and second homeowners, and I have limited sympathy for out-of-town investors fighting to maximize profits at the expense of residents' quality of life and the fragile habitat of the high desert.

I especially like the proposed non-transferability of STR permits. This helps keep property values tied to income and long-term rental rates - not inflated STR revenues. I also support proposed limits on the number of STR's that can be owned by a single entity (although this can be easily obfuscated by LLC ownership). I would also like you to consider prioritizing owner-occupied STR's over ghost-ownership that isn't responsive to guest issues.

Thank you for your consideration,

Bill Gallen
62438 Dennis Avenue
billgallen@gmail.com
970-596-5792

From: [Rebecca Corona](#)
To: [Planning Commission Comments](#)
Subject: Planning commission meeting comment project PMISC-2020-00005
Date: Wednesday, February 2, 2022 9:36:20 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County
Planning Commissioners and Board
of Supervisors,
Please accept my comments below
regarding the changes to the current
San Bernardino County Short Term
Rental Ordinance which are now
being proposed by Code
Enforcement and which the
Planning Commission will discuss at
its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN
AREAS ARE DRASTICALLY
DIFFERENT
- There must be different STR
rules or adjustments made for
the Desert region versus the
Mountain region.
 - The proposed changes
to the ordinance are
being driven primarily by
complaints from the
mountain region (Big
Bear in particular).
These proposed
changes to the STR
ordinance adopt much of
the language of the city

of Palm Springs, in
Riverside County.

- San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- The vast desert region of SB County is NOT Palm Springs.
- The vast desert region of SB County is NOT Big Bear.
- The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
- Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- The county is attempting to shoehorn two very

different areas into a single set of STR rules.

- If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

- OCCUPANCY

- I oppose the proposed change in the occupancy calculation.
- Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL

- I oppose the proposed

change which would limit STR permits to 1 per parcel.

- The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.
- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length

of was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated

based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.
- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

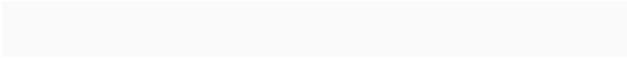
Thank you for your consideration,
Rebecca Corona

5323 Shadow Mountain Road

Joshua Tree CA 92252-1890

970-623-9091

rebeccaacorona@gmail.com



Sent from my iPhone

From: [Colin Dougherty](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: Comments on new STR ordinance
Date: Wednesday, February 2, 2022 7:35:34 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
- The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
- San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- The vast desert region of SB County is NOT Palm Springs.
- The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
- Parcels are primarily over 1 acre.
- We are thinly populated.
- We have plenty of parking on most of our properties.
- We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions

and allowances for larger parcels!

- SINGLE STR PERMIT PER PARCEL

- I oppose the proposed change which would limit STR permits to 1 per parcel.
- The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY

- I oppose the proposed change to two night minimum stay.
- Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
- In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
- At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12

- I oppose the proposed regulation of guest children under 12.
- As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING

- I oppose the proposed change to limit maximum parking.
- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends

or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE

- I oppose the proposed change to phone response time.

- Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Colin Dougherty
8474 Quail Springs Rd
Joshua Tree 92252
415-990-7552

From: [George Bennett](#)
To: [Planning Commission Comments](#)
Subject: Comments on proposed STR ordinance changes
Date: Wednesday, February 2, 2022 10:50:25 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Commissioners,

As a licensed architect and as a vacation rental owner, I am very familiar with the issues at hand. While I support the spirit of the existing and most of the proposed regulations, there are some that I feel extend beyond the necessary reach.

1. I take issue with the proposed one STR limit per property. If zoning allows a house plus a guest house/ADU, then it should be permissible to have an STR for each.

Our own first-hand experience is that when multiple guest parties are on a property, they are respectful of each other and actually MORE likely to keep the peace, not less. They are more aware of others when they are on the same property.

In addition, a one STR per property limit would discourage development of ADU's. This is not beneficial in the long term, and runs counter to the State's desire to create more housing stock. We have multiple projects on the boards that intend to create new ADU's in addition to main houses, and I fear most of these would be canceled if this new rule were to take effect. The resulting extra housing stock would thus never be built. Properties change hands with some regularity, so if these ADU's exist, at least some of them likely will be occupied by community residents at some point.

2. I take issue with limiting the number of STR permits issued to individuals, trusts, or LLC's to two. I do not feel that this is an effective mechanism for freeing up housing stock, nor have I seen evidence of this being a problem. If the proposed rule of having owners or managers be no more than 30 minutes away (which I support) is in effect, then there is nothing that a permit limit number does to improve quiet enjoyment of local residents. On the contrary, I know many locals who depend on having more than two STR's for their livelihoods, and this would hurt them.

I feel very strongly that these two proposed regulations should be taken off the table.

Thank you for your consideration,

George Bennett
a r c h i t e c t
BENNETT BINNS
760 – 676 – 9686

From: [Leslie Satterfield](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Community Input
Date: Wednesday, February 2, 2022 11:56:35 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planning Commissioners And Dawn Rowe,

My name is Leslie Satterfield and I've been living out in the Desert Region for 8 years now. I've seen our area grow and prosper during this time but now it feels like it's growing out of control. Large Investment firms are coming in and they don't care about our desert, they only care about making money which is why I Urge you to limit the number of Short Term Rental Licences to two or three per person, LLC, Corporation or Investment company.

I OPPOSE the Occupancy calculation change. I have a one bedroom but also a very large great room that I have plenty of room for a fold out couch and my one bedroom is on 5 full acres so this change would be devastating to my small air bnb.

I came out here because my best friend lives here and I fell in love with the magic of the desert. I put every bit of my savings into creating one very thoughtful air bnb. I did it out of a love of design and a love of creating and yes, the need for financial security. I employ a mother of three and I pay her a very good wage for the work she does for me.

One of the things I invested in on my property was a trailer. It has been a big financial loss to not be able to rent it out with the Alternative structure law. At one point I heard that homeowners were going to be allowed one trailer but I see 100 plus trailers coming up at Auto Camp and wonder if I'll ever be permitted to rent the one I spent months redoing on my own.

I am hoping to one day be able to turn my permitted Garage into an ADU. My property is on 5 Acres and I have lots and lots of parking available, so please allow ADU conversions. I think it really helps property owners like myself get by. With inflation the cost of living for us working folks has gotten pretty tuff!

I believe that The Mountain Region and The Desert Region are VASTLY different. It's very important that there are different guidelines. It only makes sense. Most of the county of San Bernardino is Rual Desert but the complaints that are being addressed are for isolated areas like Palm Springs and Big Bear. Parking situations are a lot different in most areas of Joshua Tree and Yucca Valley. My house for one is on 5 Acres with a drive way that is about an acre from the street.

Thank You! Warmly,
Leslie Satterfield
Home Owner / Desert Community member

From: [Andy Gerrard](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 10:22:15 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4

additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

Thank you for your consideration,

Andy Gerrard

7658 Aster Ave, Yucca Valley, CA, 92284

andy.gerrard@gmail.com

747 229 6364

From: [Planning Commission Comments](#)
To: jendean100@icloud.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 9:40:58 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Jennifer Dean
21168 Escondido Street
Woodland Hills, California 91364
818.335.2166
jendean100@icloud.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: STR

Comments: I have been a STR owner in San Bernardino for over a decade. My rentals bring hundreds of thousands of dollars into the community yearly, because of the large family groups that come to stay. Why would you continue to put limits on people building their businesses? Other businesses do not have these kinds of restrictions. We are actually helping the community and bringing revenue to markets, restaurants, gift shops, clothing stores, gas stations, ski resorts, etc. Limiting our right to run our business seems counter to our rights as tax paying Americans. Thank you, Dr. Jennifer Dean

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Thomas Donahue](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 10:40:16 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Morning,

I am a property owner and manager who lives and operates in unincorporated Yucca Valley.

I would like to briefly address the 3 most draconian aspects of the proposed change to STR ordinance.

1. New ordinance: One STR permit per parcel

Issue: Many residents have spent significant amounts of money to build an ADU on their lot with the knowledge they would be able to rent it out as an STR in conjunction with the primary dwelling. For lot sizes >2 acres, this is an illogical restriction as there are many <1 acre lots adjacent to one another being rented out as STRs

Solution: Maintain current allowance for >1 STR permit on lot sizes >2 acres

2. New ordinance: Minimum 2-night stay

Issue: >75% of disruptive bookings I have had to respond to have been 2-3 night bookings. This proposal is clearly not based on data, merely the assumption that 1-night bookings are prone to be "parties". Outside of outlier instances where the guest is ILLEGALLY throwing a party which the host is not aware of, this restriction makes it extremely difficult for hosts who are hands-on with their unit's calendar to continue producing value for the property owner. This is even more damaging to hosts/owners during the COVID-19 pandemic, as travel industry trends & seasonality remain extremely fluid and difficult to predict/react to.

Solution: Maintain a 1-night minimum booking duration.

3. New ordinance: Occupancy restriction of 2 per bedroom / maximum 10 adults

Issue: Many residents have spent significant amounts of money purchasing, remodeling and improving "large" homes with 5-6 bedrooms and 1+ living rooms. These homes are more than able to accommodate >12 guests, and many owners factored in the assumption of generating >12 guests-worth of revenue when deciding to invest their money.

Solution: Maintain habitable square footage as the deciding calculation for occupancy. Allow living rooms/dens to remain as habitable spaces. Limit maximum occupancy of any unit to 16 (a standard limit nationwide)

--

Best,
Tom Donahue

(c): 862-354-7873

(e): donahue.tom1@gmail.com

From: [Planning Commission Comments](#)
To: travis@djtv.us
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:02:14 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Travis Winn
60324 Pueblo Trl
Joshua Tree, California 92252
3105008336
travis@djtv.us

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: I think it is important not to change the rules too much or restrict so much. What hotels have a two night minimum stay? I am a host and I also live in the house I rent out it helps provide some income to my family out here in the desert. Changing the rules too much is not good for killing this small business. A lot of people out here or not making tons of money on the air B&Bs in the marketplace is already regulating itself in the sense that there is a lot of AirBNB's here and now there's more competition. Tourism and allowing locals such as myself to take part in these opportunities is essential too much regulation will kill this flower in the desert. Please regulate less instead you could make permits easier for other services in Joshua Tree for restaurants and other small businesses. It is very hard to get things going here because of your permitting processes lots of locals are making money from the AirBNB's please support us, not the vocal minority who oppose innovation and success. I have an Airbnb right above my house and they are amazing they have been responsive to my requests on not such bright lights and the guests have never been bad in two years.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Frederick](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 11:08:10 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I OPPOSE the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted additional guests

than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - I OPPOSE the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR, especially when there is shortage of house statewide and nationally.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I OPPOSE the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I OPPOSE the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.
 - In addition, STR tourists include families and have children under 12.

- MAXIMUM PARKING
 - I OPPOSE the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I OPPOSE the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical routine medical visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I OPPOSE the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income.

Thank you in advance for your consideration.

Regards,

Frederick Jeng

7785 Elwood Street, Joshua Tree, CA 92252

fhjeng@gmail.com

(310) 486-1004

From: [Planning Commission Comments](#)
To: Kshaw27@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:02:14 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Kate Shaw
58238 Alta Mesa drive
Yucca valley , California 92284
8053412248
Kshaw27@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: Regulations are necessary for STRs. However, these need to benefit business owners as well as residents. Mandating 2 night stays or forcing only primary residences as STRs handcuffs owners without any true benefit for the community.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Sara F](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: Feb 3, 2022 Planning Commission Agenda Item 4
Date: Wednesday, February 2, 2022 3:10:42 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear County Staff and Planning Commission,

I have been a homeowner in the mountain area for 12 years, and I am grateful for the opportunity to share my treasured vacation home with respectful travelers when I am not enjoying it myself. I don't take lightly the responsibilities of being a good host and a good neighbor. I believe that your draft code proposes many great measures that, with increased enforcement and penalties for the bad apples, will bring improvements to our neighborhoods. Thank you for your efforts to make the STR code one that is fair and realistic.

It's clear by reading the code that the County understands that common complaints made in the mountain and desert communities are complex in nature and not necessarily caused by or exclusive to STRs, as many would like you to believe. For instance, the loss of LTRs is evidence of conditions that are no longer worthwhile for landlords combined with the increased cost of housing, stagnant wages, and lack of planning to meet the needs of a growing population. Limitations on STRs will not preserve LTRs. Additionally, nuisances are also committed by full time residents as well as day trippers which need to be addressed. I don't want disrespectful people on my property, near my property, or trashing my community, so I empathize with the complaints. However, all inhabitants of residential neighborhoods should be held to the same standards.

With regard to the proposal that STR permits no longer be transferable, please consider the value that STR owners add when improving their properties for this use to not only be up to current codes that otherwise wouldn't apply to a private residence. The current system of permit transfers works well, and an increased permit transfer fee would be more appropriate than disallowing transfers from one owner to the next. The proposed prohibition is setting up for an eventual cap on permits, which I do not support for its infringement on property rights.

The draft code also proposes that STR permits not be effective until after the 30 day appeal period and when pending the outcome of an appeal. I appreciate that the code specifies the grounds under which an affected neighbor may submit a claim to appeal a permit, but please consider the possibility of bogus and frivolous claims by those intending to hold an applicant hostage. No homeowner should be penalized before the outcome of an objective

investigation. The appeal timeframe and procedure should be as specific and clear as the grounds for appeals.

Please add clarification to the definitions of RENTER and SHORT TERM RENTAL. The proposed language indicates that a renter is any occupant of an STR other than the owner regardless of compensation. By Definition, an STR is a rental property and the term rental suggests there is some compensation. Clearly define that a renter is not a guest of the owner, such as a family member, who is not compensating the owner through payment of rents.

Thank you for your thoughtful consideration.

Sincerely,
Sara Fernandez

From: jwen90@gmail.com
To: [Planning Commission Comments](#); +Supervisor.Rowe@bos.sbcounty.gov; +hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 11:45:02 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

I am a property owner in Yucca Valley and Joshua Tree, with properties on the mesa. I have lived part time here for the past 7 years. I love the desert and I love our desert community.

This email is regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

The San Bernardino County Desert areas are not the same as Big Bear. Our STR rules should be appropriate to our desert area and the complaints at Big Bear are not the same as the issues we are facing here in the desert.

- Most properties are 1+ acres
- Most properties have ample parking and there are little parking-driven complaints by neighbors
- Most tourists are here to see the park, and sometimes the trip to Joshua Tree is just a one-night stop over.
- Our area is spread out, we don't have overwhelming issues with overcrowding and congestion.

OCCUPANCY

I oppose the proposed change in the occupancy calculation. Occupancy should continue to be based on habitable square footage, NOT bedroom count. Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom. Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel. The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR. On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

MINIMUM STAY

I oppose the proposed change to two night minimum stay. Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip. In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated. At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking. In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time. Thirty minutes is an unreasonably short time. A 60 minute response time is typical for on-call emergency personnel, that would seem a reasonable time for us all.

Thank you for your consideration,

Jennifer Yee

jwen90@gmail.com

Yucca Valley, CA

From: [Planning Commission Comments](#)
To: LakeArrowheadRolf@outlook.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:27:04 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Rolf Garthoffner
742 Pinnacle Dr P.O. Box 574
Lake Arrowhead, California 92352
909 744-7899
LakeArrowheadRolf@outlook.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: Mr

Comments: Regarding Short term rentals. Why was there no incentive for owners to stay with property management? For example Arrowhead Property Rental used to manage 150 short term rentals. Now they have 20. under your regulations, owners have evolved into reinventing their own marketing, cleaning, trash handling and such from large distances.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Skor Personal](#)
To: [Planning Commission Comments](#)
Subject: Fwd: Opposing STR ordinance
Date: Wednesday, February 2, 2022 12:33:12 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Commissioners,

I am writing to you as a resident of Pioneertown and an operator of three STR's, one in Pioneertown (which I reside in but lease out when I'm Gone, and another two in Unincorporated Yucca Valley. I am writing to you in OPPOSITION of the proposed STR ordinance.

I understand the frustration many residents have with STR's. Joshua Tree has been proliferated with STR's in a relatively dense neighborhood consisting of homesites on lots ranging from 6,000 to 10,000 Sq Ft. There are a lot of bad actors who are giving the majority of hosts a black eye.

Change needs to happen but not by the proposals in front of you today:

1. Properties greater than two acres should be allowed to operate two bnb's in conforming homes on a lot. The proposed ordinance limiting occupancy to 12 people on a single property is sufficient in keeping the occupancy respectable to neighbors. Therefore, restricting a property with a legal house and guest house/ADU is unnecessary.
2. Pioneertown has a handful of Full time STR's while Joshua Tree has dozens upon dozens. Why not set caps or distance restrictions for each populated area?
3. The alternative STR such as trailers and teepees should be limited to one per property where the owner lives full time like I do in Pioneertown.
4. The two night minimum is unnecessary as many people come to the desert to go to the park or catch a show at Pappys. There are not enough attractions in the area to warrant a two night minimum
5. Finally, limiting STR's will put many residents out of work. My housekeepers were barely making ends meet before I hired them. Since I hired them, they have a newer car, presents for their children, and rent is paid on time.

Thank you for your time.

Shawn Kormondy

Roadhouse Ranch

From: [Andy Brohard](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 12:29:26 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

• **DESERT AND MOUNTAIN AREAS (densely populated areas) ARE DRASTICALLY DIFFERENT**

- There must be different STR rules or adjustments made for the rural Desert region versus the densely populated Mountain towns.
- The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
- San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- The vast desert region of SB County is NOT Palm Springs.
- The vast desert region of SB County is NOT Big Bear.
- The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
- Parcels are primarily over 1 acre.
- We are thinly populated.
- We have plenty of parking on most of our properties.
- We are spread out and don't have much traffic congestion.
- Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- The county is attempting to shoehorn two very different areas into a single set of STR rules.
- These rules MUST have exceptions and allowances for larger parcels

• **SINGLE STR PERMIT PER PARCEL**

- I oppose the proposed change which would limit STR permits to 1 per parcel.
- We currently have two Single Family homes on 5 acres. Each house is on the opposite end of the property and are further away from each other than our front house is from our neighbors. There's no reason those two houses shouldn't be able to operate independently on their own permits as they do now..
- The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- BUSINESS ENTITY

- Properties are allowed to be held in an entity name and there's no reason a business shouldn't be able to hold a STR permit.
- Owner that are willing to pay the extra fees to be an LLC or Entity in this state, play by the rules. They are the ones that have strict standards for guests and operate as professionals.
- Don't deny property owners what little protection they have
- LIMIT 2 PERMITS
- For regulation abiding hosts, there should be no limits to the permits they are able to get this is arbitrary and doesn't go the heart of the problem with STRs. Regulations should be for the safety of guests, as well as the hosts and neighbors. This limit does not benefit anyone.

- OCCUPANCY

- I oppose the proposed change in the occupancy calculation.
- Occupancy should continue to be based on habitable square footage, NOT bedroom count.
- Otherwise the outcome is absurd, for example an 800 square foot bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- MAXIMUM PARKING

- I oppose the proposed change to limit maximum parking.
- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.
- 30 MINUTE RESPONSE BY PHONE
- I oppose the proposed change to phone response time.
- Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes. (There is essentially ZERO cell service in Joshua Tree National Park)

- CHILDREN UNDER 12

- I oppose the proposed regulation of guest children under 12.
- As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- YEARLY RENEWAL OF PERMIT

- I oppose the proposed change to make the renewal annual
- Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and will burden the already over worked inspectors in our area.

Thank you for your consideration in this matter.

I hope the commission is able to come to a reasonable conclusion that takes into consideration how drastically different the areas are and the extra burdens these regulations would have.

Sincerely,

Andy Brohard

4117 Bemis St.
Los Angeles, CA 90039
abrohard@mac.com
801.792.5720

From: [Planning Commission Comments](#)
To: yanmdphd@yahoo.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:46:44 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

yan zhang
3665 Bilberry Road, San Bernardino, CA, 92407
san bernadino, California 92407
9092701830
yanmdphd@yahoo.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 3

Comments: 1. Permit fee should be reduced or waived for host who don't host more than 20% time of the year, especially for disabled. 2. Street parking limits should be taken out since you already limit how many people can be in the room. 3. Inspection is only needed for property that rent out more than 20% of time. People who rent out less than that are basically having house guest. 4. There should not be any limit on how many property a person can have for short term rental since they can just go other county. It is totally bad for economy.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Grant Huang](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 1:22:05 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

The vast desert region of SB County is NOT Big Bear.

The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city. Parcels are primarily over 1 acre.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

OCCUPANCY

I oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

I oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

MINIMUM STAY

I oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

I oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages.

This is an unmanageable rule.

MAXIMUM PARKING

I oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

I oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit.

Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Grant Huang
61470 Granada Dr. Joshua Tree CA
granthuang@icloud.com
626-347-3772

From: [Planning Commission Comments](#)
To: jcgisel@att.net
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:50:37 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Joshua Gisel
1643 Sunnydale Ave
Simi Valley , California 93065
8054046626
jcgisel@att.net

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: Short term rentals

Comments: In regards to increasing rules on short term rentals, I believe the system is working the way it is. The demand for rentals is high and we are able to share our cabin with hundreds of guests and have had very little problems, I have talked to our neighbors who are full time and they always comment on how our guests follow our rules. We picked Big Bear to enjoy and invest in and so far we have been super happy with our decision. Plus with the str tax and permit fees, we definitely have been contributing to the benefit of San Bernardino County. Thank you for your consideration, Josh and Paula Gisel

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

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From: [Dominick Smith](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 1:34:28 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

I wanted to directly reach out to express my opposition to certain proposed changes to the STR ordinance. Specifically, the single SFR permit per parcel is highly punitive and should not apply to the desert communities where there are many large parcels with sufficient space for multiple rental units. For example, I own a 22AC parcel with 2 rental units; we have never had issues with neighbors or between guests. The regulations around minimum stays, children under 12, occupancy, and number of STR permits per person are also draconian - there are many hard working individuals within the county that make a living off of the STR market (as you are well aware) and these proposed changes would unduly restrict their ability to put food on their tables.

Thank you for your consideration,

Dominick Smith
617-838-5039
smithdom1994@gmail.com

From: [Planning Commission Comments](#)
To: skyranchb1@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 11:34:32 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Michael Cline
1071 G
Big Bear City, California 92314
9512176464
skyranchb1@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: The county's primary goals should be maximum freedom for citizens, and maximum respect for the private property rights. Most arguments against STRs can more effectively be applied to hotels, which in my town (Big Bear) are nearly all adjacent to residential neighborhoods. As one example.... Housing shortage? Well, let's force hotel owners to convert their rooms to rental apartments. That will cure the shortage overnight. How about STR vs. LTR? Based on decades of experience, I can say with zero doubt that the quality of the average STR guest is *far* higher than the average LTR tenant. And when there are noisy/bad STR folks, the problem can be solved *far* faster. Two items under consideration are particularly onerous: 1. A limit of one STR per property parcel. Why? If I have a five-acre parcel (I do), then I should be able to have more than one STR. A limit of one per acre could make sense. 2. Limit number of STR permits for an individual, trust, LLC or LLP to two permits. Again, why? Will hotel owners be limited to two hotels with two rooms each? Ludicrous, right? Both hotel and STR owners are meeting the same free-market demand — and at least in my town, this is *essential* to maintaining the health of all local businesses. STRs are well-established, *essential* sources of income for residents like me—and we pump a *lot* of that money into the local economy. Safety inspections / permits are wise. Ditto reasonable occupancy limits—however two per bedroom is too low. There's nothing wrong with a sofabed in a living or family room, and the limit should be on adults, not kids. Limiting a two-bedroom house to two adults and two kids would be as silly as limiting a hotel room to one adult and one child. That's my four cents. Thanks.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

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February 2, 2022

County of San Bernardino Planning Commission
385 N Arrowhead Ave
San Bernardino, CA 92415

Dear Chairman Weldy and Members of the Planning Commission:

While the proposed changes to San Bernardino County's Short Term Rental ordinance in Chapter 84.28 raise some concerns, the Inland Valleys Association of REALTORS® believes that there are areas that may be further defined and addressed to reach mutual goals on all sides of the issue.

The primary purpose of the ordinance update appears to be to limit future corporate ownership growth of short term rentals. While we share the idea that unmitigated growth of residential property used exclusively as short term rentals is not a desirable outcome for either the residential property or the short-term rental market, we remain skeptical that this approach will effectively support either. A review of permit data, recent trends and complaint information – as well as making the underlying information easily accessible – would be helpful to the public's ability to contribute to the policy discussion.

Ultimately, housing affordability in this region and in California is solvable in only one way – building sufficient housing such that supply and demand are closer to balance. The longer California, and particularly the dense urban centers, fail to meet the challenge of permitting the housing necessary to affordably house more of its population, the more stress will be placed on communities beyond the traditional economic centers of the state. The pandemic only accelerated these trends.

Below are some specific items we would like to highlight in the draft to be discussed by the planning commission:

- 1) 84.28.030 Definitions, c) business entity: This definition combined with the grandfathering of existing permits and other provisions appear to be the primary purpose of the change in law. As noted above, we're not enthusiastic that the change will spur significant impact, but are open to studying to possibility with additional data.
- 2) 84.28.040 "Permit Required" d), "STR permits shall not be transferable...." We understand this section to be focused on the concept that when a new owner takes on a short term rental permit, they should be required to acquire their own permit within a period of time rather than simply inherit the prior owner's permit. We would recommend some changes to this section.
 - a. We would ask that the 30-day period be extended to 60 days in order to allow enough time for the prior owner to do the necessary work, which may include renovations, repairs or improvements that were not possible prior to taking ownership of the

property. This is particularly important for small, mom-and-pop operations who lack the same kind of resources as larger investors.

- b. We recommend shifting the language such that it does not require the new owner to apply for a permit within the stated time, but rather cancels the permit after that time period has expired. If a new owner needs more than 60 days to work on the property, they should be able to apply for a permit at a future date without ordinance language that may appear to prejudice the application.
- c. We would further recommend that the act of applying for the permit should extend the prior permit indefinitely, especially if the remaining permitting step is scheduling an inspection. Inspections can, depending on the work load for county staff, take some time to complete. In the absence of an indefinite extension of the prior permit, the new owner, having satisfied the other criteria in the permit, should be able to operate on a provisional basis while an inspection is in process.

Thank you for your thoughtful consideration,

A handwritten signature in black ink, appearing to read "Paul Herrera". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Herrera, Government Affairs Director
pherrera@ivaor.com.

From: [Simone Boudriot](#)
To: [Planning Commission Comments](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 1:45:38 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planning Commission & Staff,

I am a registered Airbnb host since 2018 and writing to implore you to not adapt drastic restrictions to our small business operations.

We are mostly private individuals pursuing financial independence running legal operations.

The concerns of the community, some very valid, are best addressed going after illegal short-term rentals or operators who violate existing regulations, and not by limiting well-run businesses.

The proposed change to no longer allow 1-Day rentals is especially unnecessary and counter-productive as it will have 2 negative effects:

1. It only serves to drive this business toward the hotel-business, i.e. big corporate interest, while making it hard for Airbnb hosts to book out their generally softer mid weeks.
2. Offering 1-Day rentals would afford visitors the opportunity to just stay overnight rather than driving back to Los Angeles, San Diego etc, , for example, after potential alcohol consumption, which would make local streets safer.

The argument that 1-Day rentals promote party-behavior with negative consequences would much better be served by restricting 1-Day rentals for properties hosting more than 4 guests.

Smaller houses hosting up to 4 guests should be permitted to continue renting for 1-Day because you are not running the risk of a large gathering.

Please share my thoughts with the Commission.

Thank you for your consideration,

Simone Boudriot

8090 Scholl Dr.

Morongo Valley, CA

From: [Planning Commission Comments](#)
To: travis@djtv.us
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 11:37:25 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Travis Winn
60324 Pueblo Trl
Joshua Tree, California 92252
3105008336
travis@djtv.us

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: I think it is important not to change the rules too much or restrict so much. What hotels have a two night minimum stay? I am a host and I also live in the house I rent out it helps provide some income to my family out here in the desert. Changing the rules too much is not good for killing this small business. A lot of people out here or not making tons of money on the air B&Bs in the marketplace is already regulating itself in the sense that there is a lot of AirBNB's here and now there's more competition. Tourism and allowing locals such as myself to take part in these opportunities is essential too much regulation will kill this flower in the desert. Please regulate less instead you could make permits easier for other services in Joshua Tree for restaurants and other small businesses. It is very hard to get things going here because of your permitting processes lots of locals are making money from the AirBNB's please support us, not the vocal minority who oppose innovation and success. I have an Airbnb right above my house and they are amazing they have been responsive to my requests on not such bright lights and the guests have never been bad in two years.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [James Bianco](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Cc: hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 2:21:06 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

• **DESERT AND MOUNTAIN AREAS (densely populated areas) ARE DRASTICALLY DIFFERENT**

- There must be different STR rules or adjustments made for the rural Desert region versus the densely populated Mountain towns.
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- We are spread out and don't have much traffic congestion.
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- The county is attempting to shoehorn two very different areas into a single set of STR rules.
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- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
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- BUSINESS ENTITY

- Properties are allowed to be held in an entity name and there's no reason a business shouldn't be able to hold a STR permit.
- Owner that are willing to pay the extra fees to be an LLC or Entity in this state, play by the rules. They are the ones that have strict standards for guests and operate as professionals. We are simply trying protect ourselves from additional liability.
- Don't deny property owners what little protection they have.
- LIMIT 2 PERMITS
- For regulation abiding hosts, there should be no limits to the permits they are able to get this is arbitrary and doesn't go the heart of the problem with STRs. Regulations should be for the safety of guests, as well as the hosts and neighbors. This limit does not benefit anyone.

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- I oppose the proposed change to phone response time.
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- As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- YEARLY RENEWAL OF PERMIT

- I oppose the proposed change to make the renewal annual
- Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and will burden the already over worked inspectors in our area.

Thank you for your consideration in this matter.

I hope the commission is able to come to a reasonable conclusion that takes into consideration how drastically different the areas are and the extra burdens these regulations would have.

Sincerely,

James Bianco
14139 Gault St
Van Nuys, CA 91405
jamieorlando24@gmail.com
661.478.9846

From: [Planning Commission Comments](#)
To: mofongovalley@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 11:48:54 AM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Joy Silverman
63665 Sullivan Rd
Joshua Tree, California 92252
626.773.6899
mofongovalley@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: I am writing, as an owner of a 5 acre property in Joshua Tree, regarding, changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022. Our property is one of the very first airbnb's and short term rentals in the area operating for more than 14 years. When the STR ordinance passed for San Bernardino County we got our cabins permitted immediately. All this time there has never been any complaints from neighbors, we've never allowed parties - mostly, our guests come out to enjoy nature and the quiet, calm of the desert. We have contributed to the economy in many ways including paying high property taxes, hotel taxes, and now 3 permit fees besides contributing to many local businesses. The changes to the current San Bernardino County Short Term Rental Ordinance will be extremely detrimental to the well being of our family run small business. I particularly oppose: 1. I oppose limiting STR ownership to 2 STR permits per person. this doesn't take into consideration, people that have more than one structure on large parcels. 2. I oppose the proposed change which would limit STR permits to 1 per parcel. Large (2.5 to 5 acre) parcels with more than one legal structure should continue to be allowed STR permits and should be grandfathered in as a valid non-conforming use. 3. I oppose the proposed change in the occupancy calculation. Occupancy should continue to be based on habitable square footage, NOT bedroom count. 4. I oppose changing permit renewals to yearly from every two years. The cumulative costs become prohibitive. 5. I oppose the proposed change to phone response time. Thirty minutes is an unreasonably short time, as many areas of the Hi Desert have spotty cell reception making this response time very difficult. thank you for your consideration.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Wayne Hamilton](#)
To: [Rowe, Dawn](#); [Planning Commission Comments](#); skyviewfarm29@gmail.com; [Prusch, David - LUS](#); [Duron, Heidi - LUS](#); janetjohnstn@earthlink.net
Subject: For Planning Commission Hearing on Short Term Rentals
Date: Wednesday, February 2, 2022 12:29:39 PM
Attachments: [letter of str considerations.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Dawn

Please take the time to review the attached letter with the planning commission

Over the last 6 months, the STR's influx is causing 1.89 families a day to become unhoused. These numbers are on the conservative side. Most of the homes being sold are 2 bedrooms and above. And included families that have been housed, working, educating their children, and contributing to our community for years.

Thanks for your consideration

Wayne Hamilton

Hi Supervisor Rowe,

By now you received the letter from The Morongo Basin Conservation Association. It was very well written and contained some good facts.

As you know I work with many the displaced families within the Morongo Basin currently and have for the last 14 years. I have been contacted by 12 families that have expressed they have received a 60-day notice to move because their landlord had stated they want to sell the properties in last couple of weeks. Most of these families are unable to become rehoused in our area due to a number of residential units being removed from the inventory. I see that the planning commission is going to convene to update the ordinance for the STR units in our area.

As the Planning Commission moves forward, I would like to highlight some key items.

- 1) The number of STR you have permitted does not cover the all of the units that are operating in this capacity.
- 2) Since the letter to the commission was received from MBCA, some new numbers have come to light on real estate transactions that should be considered.

Since August 2021 to February 2022

	Properties sold	Vacant Lots	Home s	Median Price	1 BR	2 BR	3 BR	4+ BR
Yucca Valley	620	148	472	\$400k	73	129	205	65
Joshua Tree	421	167	226	\$490k	25	77	88	13
Twentynine Palms	516	17	371	\$250k	32	98	140	50
Morongo Valley	65	11	51	\$360k	19	8	17	3
Totals	1622	443	1120		149	312	506	131

That's approximately 2,815 Bedrooms that will most likely be taken off the rental market over last 6 months. An average of 186 units have sold each month so even if as little as 30% of these were occupied, that would result in around 56 families who do not have a chance of being rehoused in the Morongo Basin each month.

Many of these displaced residents are average working families who, having been priced out of the real estate market here, will most likely need to seek housing and employment elsewhere.

I am glad the commission is asking for suggestions and input. My suggestion is that you put a moratorium on issuing STR permit until the county has the real numbers of permitted and unpermitted STR units. Hopefully the commission takes the time to realize the problems, hardships, and damage it is doing in our community, and also takes steps toward planning for affordable housing for the full-time residents needed to sustain a tourist economy.

Sincerely,

Wayne Hamilton
760 401-0375

From: thirumal455
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 2:34:06 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

- DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- There must be different STR rules or adjustments made for the Desert region versus the Mountain region.
 - The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
 - The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and don't have much traffic congestion.
 - Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!
- OCCUPANCY
 - I oppose the proposed change in the occupancy calculation.
 - Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
 - Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

- SINGLE STR PERMIT PER PARCEL
 - I oppose the proposed change which would limit STR permits to 1 per parcel.
 - The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

- MINIMUM STAY
 - I oppose the proposed change to two night minimum stay.
 - Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

- CHILDREN UNDER 12
 - I oppose the proposed regulation of guest children under 12.
 - As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

- MAXIMUM PARKING
 - I oppose the proposed change to limit maximum parking.
 - In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

- 30 MINUTE RESPONSE BY PHONE
 - I oppose the proposed change to phone response time.
 - Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income and are

Thank you for your consideration,
 Thirumal Mogulla
 1111 latham trail joshua tree,ca 92252

thirumal455@gmail.com

3177535979

From: [Planning Commission Comments](#)
To: ijeoma@in-rg.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 12:35:16 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Ijeoma Njaka
3640 Cardiff Ave. Unit 203
Los Angeles, California 90034
310-617-9792
ijeoma@in-rg.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 84.28.060

Comments: My 2nd bedroom has a deluxe bunkbed; full over queen, which comfortably sleeps 4. It does not make sense to limit a bedroom to 2 occupants, especially when many families have 3 or 4 children who could easily share one room with either a deluxe bunk bed or multiple bunk beds. I also have a pull out cot that comfortably fits in my living room and stores in a bedroom or hall closet. I legally can sleep 7 at my 2 bedroom cabin. My average guest capacity is 5. I strongly oppose setting a 2 person per bedroom limit on STRs in San Bernardino County.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Amber Line](#)
To: [Planning Commission Comments](#)
Date: Wednesday, February 2, 2022 3:55:27 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To Whom it May Concern,

I am a resident of Landers, CA. I have been working in and around the short-term rental space for several years. Of all of the ways to make money, the STR space is where this comes most quickly and easily. Any changes to STR regulations has the potential to have a negative affect on my ability to produce money for my household. This is especially true given some past health issues my husband has had to endure.

Of the regulation's proposals that are most concerning to me, I would like to specifically point out forcing stays to 2-nights. A great portion of my work is related to 1-night stays. 1-night stays pay the same as longer stays and are usually easier to both manage and complete. If 1-night stays were not available, this would make my life harder. I graciously ask that this be reconsidered.

Thank you for your consideration,

Amber Line
P.o.box 3096, Landers 92285
ambersline68@gmail.com
760-250-6179

From: [Peter Spurr](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting comments Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 3:15:30 PM

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Planning commission and all other CC'd parties.

It's understood that some revisions to the current STR ordinance will be considered.

I--like other property owners--feel that a 2nd unit on acreage properties, minimum of 2 acres, was a fair and thoughtful guideline. If this must change, and I don't understand why it would, then perhaps a "grandfather" provision should be instituted for those who currently utilize a 2nd dwelling or ADU on their property. Changing a property's permitted use after the fact rings a bit unfair to the owner.

Additionally, restricting the number of guests at any STR seems reasonable and logical, but the guidelines might observe square footage rather than bedroom count. Some properties have massive square footage and plenty of living space, but only 1-2 bedrooms. Maybe limit guests to the dwelling size according to the county assessor sq footage count instead?

Thanks.

Peter Marshall Spurr, GRI
Broker Associate @ Joshua Tree Realty
Broker License # 01414588
(760) 861-5895 cell
Peter@BrokerPeter.com
www.BrokerPeter.com

From: [Planning Commission Comments](#)
To: ijeoma@in-rg.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 12:42:57 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Ijeoma Njaka
3640 Cardiff Ave. Unit 203
Los Angeles, California 90034
3104398677
ijeoma@in-rg.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: I have a 2 bedroom cabin in Sugarloaf. My 2nd bedroom has a deluxe bunk bed; full over queen. This bed comfortably sleeps 4. I also have a pull out cot that fits easily in my living room and stores in either a bedroom or hall closet. My current home capacity allowance is 6. My average guest bookings are families of 5. I am strongly opposed to the proposed limitation of 2 people per bedroom, especially in the case of homes where bedrooms have deluxe bunk beds or even multiple bunkbeds, both of which easily and spaciosly sleep 4 to the room.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Thomas Fjallstam](#)
To: [Planning Commission Comments](#)
Cc: [Rowe, Dawn](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 4:51:23 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners,
I am writing today regarding changes to the San Bernardino County Short Term Rental Ordinance on the agenda for your meeting on Feb 3rd, 2022.

Mountain and Desert regions require separate consideration. Different regions of SBC are significantly different in residential building density. Desert region should not be forced to comply with regulations meant to alleviate issues that higher density Mountain and other regions are experiencing. Much of the acreage language has been removed to the detriment of STR owners in the Desert region. It is a huge disservice to apply this one-size-fits-all approach to the entire county, penalizing areas which don't have issues that higher density regions do.

Limiting STR of ADU and SFR: Opposed - maintain current rules "Only one STR shall be permitted on a single-family residential parcel."

- This is one way in which larger acreage properties are being forced to comply with regulations intended to alleviate problems in denser populated areas.
- Do not change the current rule to allowing 2 STR permits for parcels 2 cars or larger.

Occupancy Limits: opposed- maintain current rules

- New limits based solely on the number of bedrooms is not fair to properties in the Desert Region which are often smaller homes on large acreage.

Maximum Parking: opposed

- Desert region has a lot more space on parcels so making this isn't fair to larger acreage properties.

Daytime Visitors: opposed

- limit of four daytime guests considering space available for guest parking does not take into consideration large properties of the Desert Region

Minimum Stay 2 nights: Opposed - keep current rules

- What is the justification for this?
- Many travelers and those with families have limited time during their vacations and pass through many areas as part of a roadtrip. Cutting out STR as an option for these groups will force them into less desirable hotel situations and because of this would cause travelers with limited time to completely avoid our tourist destinations.
- If there is some perceived resources savings such as water reduction being used to justify this then a forced 1 night hotel stay would incur the same amount of impact with laundry, etc.
- Many cleaners earn increased income generated by 1 night stays. This will cut locally generated income.

30 Min Response by Phone: Opposed -keep current rules

- I am opposed to changing the 1 hour on site rule. 30 minutes

Annual Renewal: opposed

- This will place unnecessary financial and time burden on owners
- lower income owners are already strained by fees
- Additional permit processing by seemingly already overloaded and behind Code Enforcement Dept

Children Under 12:

- How are hosts supposed to verify the age of guests?
- Families are a large portion of guests. Many can save by having their small children share a home. Cutting this opportunity out for families with many children under 12 is adding a financial burden to their

Limit 2 permits per person: least increase to 3

- Many local residents rely on income from operating several rentals. There should be a better way to resolve the issue of outside investor owners from having an impact on residential ownership.
- there is no limit to ownership of long term rentals and this also has a significant impact on locally owner occupied homes.

Thomas Fjallstam

Full time resident of Joshua Tree, CA

From: [Planning Commission Comments](#)
To: mstrachan951@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 4:16:10 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Margaret Strachan
58245 Lisbon Dr
Yucca Valley , California 92284
9099101873
mstrachan951@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: SUPPORT—Proposed County Development Code Section Changes for short term rentals I support with the following additions/changes: Page 10 application process. The term “surrounding properties” for noticing is vague and must be defined. Page 12 safety. Solid fuel burning outdoors must also be prohibited in the desert region. Page 18 safety. In desert areas with commercial trash service, trash and recycling cans must be placed out at curb no earlier than mid day the day prior to collection and moved from the curb to the side or rear of the home by mid day the day after collection. They cannot be left curbside 24/7. A cap must be considered as it is imperative that people can live in a community where they know their neighbors, and the town has a sense of unity. You cannot create developments specifically for STR and then say well, just build low income housing for the people in the service industry. Housing is a critical need, and communities should not be decimated by short term rentals. The term residential implies to reside, to live long term in a home. A STR permit allows a major change to the general plan for an area and there is a reason a transient tax is paid on a legal STR—transiency is not good for a residential area, especially when the properties are owned by people who may not have even visited the area. Thank you for the opportunity to comment. Margaret Strachan

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

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From: [Pamela Hansen](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 5:18:50 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
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DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT!

There must be different STR rules or adjustments made for the Desert region versus the Mountain region.

The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

The vast desert region of SB County is NOT Palm Springs.

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The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

Parcels are primarily over 1 acre - ours is 2 1/5 acres.

We are thinly populated.

We have plenty of parking on most of our properties.

We are spread out and don't have much traffic congestion.

Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

The county is attempting to shoehorn two very different areas into a single set of STR rules.

If this is how the county wants to operate -- many of these rules **MUST have exceptions and allowances for larger parcels!**

OCCUPANCY

We oppose the proposed change in the occupancy calculation.

Occupancy should continue to be based on habitable square footage, NOT bedroom count.

Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.

Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

We oppose the proposed change which would limit STR permits to 1 per parcel.

The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.

On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.

At a minimum, existing properties with 2 STR permits for both house and ADU must be

grandfathered in as a valid non-conforming use.

MINIMUM STAY

We oppose the proposed change to two night minimum stay.

Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.

In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

We oppose the proposed regulation of guest children under 12.

As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

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We oppose the proposed change to limit maximum parking.

In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

We oppose the proposed change to phone response time.

Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,
Roy Houston and Pam Hansen
61355 Navajo Trail
Joshua Tree, CA 92252
pjhlcsw@gmail.com
619-724-7716

From: [Planning Commission Comments](#)
To: lisa1baer@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 4:38:04 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Christopher Baer
631 South Mariposa Ave
Burbank, California 91505
8182991456
lisa1baer@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: STR Lake Arrowhead

Comments: Please find a few comments we have regarding this hearing We should CONTINUE to have the ability to transfer the STR permit IF AND WHEN we sell our property. We based the economics of our ORIGINAL purchase of the property based on our ability to have an STR and the ability to sell it with an STR license in place. We should not be damaged economically after the fact by a “taking of the economic aspects of our property” because the county is changing its policies. Permits once granted should not be rescinded as long as the owner is in good standing with the county. Renewal requirements should remain bi annual to limit the time needed to apply and to keep the application fees as they are. Going to an annual renewal would cost the homeowner an additional \$600 every two years. Call response: The requirement for a property owner to be on site within one hour seems onerous to me. It can take anywhere from an hour and ½ to two (2) hours for us to get to Lake Arrowhead from our home. I suspect most property owners in our area would have similar or longer response times. There should be no limitation on the number of days per month that a STR can be rented. Our Lake Arrowhead cabin is desirable in the summer but has limited rentals during the off peak season. It is important for us to be able to lease the property when the demand is there. The proposed limitation on the number of days that one can rent their STR is in effect a “taking of our property rights” by limiting the ability for us to rent the property after we have owned and operated our STR for many years. Thank you

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Ben Buckalew](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Meeting Comments for Feb 3rd 2020
Date: Wednesday, February 2, 2022 9:27:59 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,
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- YEARLY RENEWAL OF PERMIT
 - I oppose the proposed change to make the renewal annual
 - Annual renewal fees and process will place an overly burdensome expense for owners who are of limited income.

Thank you for your consideration,

Ben Buckalew

55634 Napa St, Flamingo Heights, CA 92284

ben@specific.works

714-865-1962

--

Ben Buckalew,
Principal



ben@specific.works
o: 714.865.1962

From: [Lori Gresty](#)
To: [Supervisor Rowe](#)
Cc: [Planning Commission Comments](#); [COB - Internet E-Mail](#); hello@joshuatreeva.com
Subject: Planning Commission Meeting Comment February 3, 2022, Project: PMISC - 2020-00005
Date: Wednesday, February 2, 2022 2:05:50 PM
Attachments: [Feb 3, 2022 Planning Commission Meeting Comment re ADUs.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

PLEASE READ REGARDING ADUs AND STR BUILDING & OPERATING PERMIT UNCERTAINTY

Dear Supervisor Rowe and Board of Supervisors,

I am a full time resident of Joshua Tree and live in a quiet North Joshua Tree neighborhood. My property is a fenced .45 acre parcel, with evenly spread out .45 acre fenced parcels on three sides and a residential fenced 5 acre property at the rear. It is a fairly respectful neighborhood and we get along with each other. **I'm writing to you personally since your decisions greatly affect so many households in Morongo Basin.**

I closed down my STR ADU that sits on the same parcel as my home in March 2020 and have been unable to obtain as-built drawings for a building permit before applying for an STR operating permit. The regulations regarding ADUs either keep changing or are now not even allowed. **I've lost thousands of dollars in income and feel strongly that owner-occupied parcels should at least receive some preference to become a permitted STR.**

The communication regarding ADUs and STRs with the public on your website is confusing, constantly changing or misinformed between departments. **Please see the attachment for lengthy documentation.** The constantly updated and changing regulations, which I assume are meant to enact some measure of control over our oversaturated market, have done nothing to support the community of STR hosts who live here, invest their time and money in the community, and support local hospitality service workers - from cleaners, handymen, plumbers, contractors to local restaurants and shops. In addition, we support National Park tourism and in general have often beautified neighborhoods that were once run down and neglected.

Please do review the attachment and these concerns to help reach a balance between corporate entities (AutoCamp) and the smaller, bespoke properties that enhance a Joshua Tree experience for guests visiting the high desert.

Thank you for your time,

Sincerely,

Lori Gresty

4630 Avenida del Sol, Joshua Tree

lorigresty11@gmail.com

702.373.2973

Planning Commission Meeting Comment, February 3, 2022, Project: PMISC – 2020 – 00005

Short Term Rental and ADU information on SB County website that is confusing, constantly changing and/or misleading:

Direct from **Short-Term Rental FAQs – What is a short-term rental (STR)**

A residential dwelling unit or portion thereof rented or otherwise used for residential transient occupancy. Transient occupancy generally means occupancy for 30 consecutive calendar days or less. The rental can be for the entire home, accessory dwellings, or limited to one or more rooms. Individual units, such as an apartment or condominium, located within a multi-family residential project, is not eligible for a short-term rental permit.

Direct from **Land Use Services FAQs – Can I use my ADU as a short-term rental?**

It depends. Short-Term Rentals (STRs) are only allowed in the Mountain and Desert regions, and are not allowed in multi-family structures. Additionally, state law requires the rental of certain types of ADUs be for a term longer than 30 days. This restriction prohibits the County from approving an ADU for STR use regardless of its location within the County. ADUs prohibited by the state from being used as a STR are classified by the County as a “by-right” ADU. A by-right ADU is one that the County was required to approve notwithstanding any other applicable County development standard.

Your ADU is likely a “by-right” ADU if “but for” applicable development standards, the County was required to approve a building permit for an ADU because it complied with the following requirements:

- (A) The ADU is located within the proposed space of a single-family dwelling or existing space of a single-family dwelling or accessory structure, which may include an expansion of not more than 150 square feet beyond the same physical dimensions as the existing accessory structure to accommodating ingress and egress, the space has exterior access from the proposed or existing single-family dwelling, and the side and rear setbacks were sufficient for fire and safety notwithstanding setback restrictions.
- (B) A detached, new construction, ADU that does not exceed four-foot side and rear yard setbacks, has a total floor area limitation of not more than 800 square feet, and a height limitation of 16 feet.

Where can I find more information about ADU regulations?

Yes. The County is currently working on updating its ordinance regarding ADUs and JADUs. Until the County’s ordinance is adopted please refer to the new State regulations found on the California Department of Housing and Community Development website.

<https://www.hcd.ca.gov/policy-research/AccessoryDwellingUnits.shtml>

2021 Update to Accessory Dwelling Unit Standards – August 2021 SB County website

Number – Up to two ADUs may be allowed per single-family dwelling. If parcel is greater than five acres up to three ADUS are allowed.

The overall data includes Development Standards, Application and Fees, Code Enforcement, Maximum Size Allowed, Height, Lot Coverage, Conversion of an Existing Accessory Structure, Interior Side and Rear Setbacks, Front and Streetside Setbacks, Separate Entrance, Kitchen, Sanitation, Deed Restriction, Rental Allowance, Short-Term Rental, Owner-Occupancy Requirement and Other Development Service Fees.

Complete text can be found on SB County website Land Use Services under Accessory Dwelling Unit Handout August 2021

January 2022 SB County Redline draft re: ADUs

Page 3 – does not address updated ADU regulations from 2021 Update to Accessory Dwelling Unit Standards at all. Is crossed off in red. Simply switches to: **Only one STR shall be permitted on a single-family residential parcel.**

From: [Planning Commission Comments](#)
To: sergeyisla@yahoo.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 6:29:38 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Serg Drig
27609 Cedarwood Dr
Lake Arrowhead, California 92352
323-302-3063
sergeyisla@yahoo.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: #4

Comments: We would like to inform the County of San Bernardino County Planning Commission that we will be filing a class action if the county decides to impose a moratorium on STR permits. STR brings tourists and supports local businesses during these difficult times. The County needs to be more concerned about the BUMS in its jurisdiction than vacation rentals. Code enforcement does nothing about these dumpy properties all over Joshua Tree owned by locals.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Laura Emerick](#)
To: [Planning Commission Comments](#)
Subject: Proj# PMISC-2020-00005 Short Term Rentals, Planning Commission Meeting on Feb. 3, 2022
Date: Wednesday, February 2, 2022 1:21:40 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino Planning Commission,

I hope that you decide to ADOPT the proposed Ordinances which would amend Chapter 84-28, Short Term Rentals, during your meeting on Thursday, Feb. 3, 2022.

After reading the proposed changes to the amendment, I have only a few questions that are not currently addressed in the current document. The issues that I have additional questions about are:

- Private Roads and Roads that are funded though the County's Road Maintenance Assessment Districts. How can STR owners be held accountable for the increased vehicular traffic that is associated with an STR? This investor-fueled business venture clearly causes far more vehicular trips than what is incurred by most residential use. The traffic associated with for-profit STRs can include months and months of contractor's vehicles (debris removal, demolition, contractors who pour slab foundations, electricians, plumbers, carpenters, landscaping, pool/spa installation, etc.) and then an ongoing cleaning staff and management checking guests in as the business resumes normal functions within an area that has been zoned for (non-commercial) residential use. And then add in the STR guest's use of the road, which may be equivalent to actual residential use. A lot more money can be poured into the cost of demolishing, building, expanding a commercial endeavor than what many residents will be spending on their own residential home. Residents who live on these Private Roads and in Road Assessment Districts may be mindful of the road conditions and may work to ensure the quality of the shared roads. Visitors and contractors, by contrast, may give little thought to HOW one drives through an area, unnecessarily causing damage to roads, deep ruts, and high dust clouds as they engage in their business activities. How can for-profit STR owners be good stewards of Private Roads and Road Districts? Can any additional "road maintenance fees" be added to permits that seek to remodel existing structures? Can the presumed additional contractor vehicle trips be accounted for and adequately funded to maintain residential roads?

- Surrounding Property Owner. In the case of a month-to-month renter, a resident of San Bernardino County, how will long-term renters be informed of changes in their neighborhood regarding STRs, and whom to contact in the event of badly behaved guests? Must month-to-month renters work through their landlords? Will landlords voluntarily share STR notifications with their tenants? Does the county mail information to the property owner on record, or mail information directly to the surrounding property?

Thank you,
Laura Emerick
San Bernardino County Resident

From: [Tamra L Speakman](#)
To: [Planning Commission Comments](#)
Subject: Proposed Amendment- Short-Term Residential Rentals Feb 3 meeting comment
Date: Wednesday, February 2, 2022 5:54:18 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I am writing in regards to the proposed changes to the STR regulations in unincorporated San Bernardino county. I am a long time resident of Morongo Basin and currently reside in the unincorporated area of Joshua Tree. We continue to see an uptick of STRs in our area that are taking the available housing for locals and displacing people. I and my daughter are both disabled and lower income. Our long term rental of almost 9 years was recently sold and finding housing was extremely difficult. We came very close to being displaced ourselves. I was informed by the management company that the handful of rentals that became available had received 100s of applications and that this is currently the norm for every rental that comes available. I believe my excellent rental history and persistent contact was the only reason I was chosen for one of these properties. There are many who are not so lucky. I had to give a deposit on a rental that I never physically saw the inside of and is lacking many features I would normally desire to feel secure and safe. The size of the rental is almost 1/3 smaller in size than my previous one and higher in price. The absentee investors buying up houses for the STR market has also caused rental inflation that makes prices unaffordable for those who live here and work in the service industry. They are having to move out of the area and now businesses are short employees. The rental agencies are not doing needed repairs on the available rentals because renters have no choice other than to stay there. Therefore many of our neighborhoods are becoming downtrodden. I believe the continued growth of STRs has contributed to the scarce availability of rentals and substandard housing conditions.

Some specific considerations for STR regulations I have are:

- Absentee investor landlords buying up houses for the STR market causes a shortage of rentals and an increase of prices beyond what the residents of this area can manage.
- Absentee landlords are unable to respond to the many disturbances STRs cause in neighborhoods.
- STRs should be permitted only to those living locally full time and on the same or adjacent property as the STR.
- We need limits on how many are allowed in neighborhoods as well as each unincorporated area in general. The housing needs of the full time residents should be the main focal point taken into considerations in determining limit amounts.

Individual full time residents not businesses only should be granted permits. 1 permit per individual.

- New housing should be for long term rentals or full time residents only not for STR.
- I oppose the approval of condominiums for STR use unless it is a room in an owner occupied unit. Such tourist traffic will be detrimental to full time residents in close units such as these and take even more housing away from full time residents.
- I agree with the proposed 1 short time rental per parcel however the parcel should also be owner occupied or owner of an adjacent parcel.
- The desert ecosystem is very fragile and we have many protected plants including the Joshua Tree. More building of housing for STRs causes harm to our fragile desert ecosystem and protected plants. New housing should be saved for full time residents.
- Our current septic, sewer, water, and electric situations cannot sustain more housing therefore new housing should be saved for full time residents.
- STRs in the desert need to be included in bonfire or other fire restrictions as we have had people gathering fragile desert plants and having large fires very close to homes in neighborhoods. Many of our desert areas are high fire risk and have high winds. STR renters need to be educated on fire safety and regulations.
- Sound carries in the desert and neighbors further away than the immediate houses around an STR may be disturbed by the STR tenants. All STRs need signs with phone numbers so all local residents can contact someone if there is a problem or disturbance 24 hours a day.

Sincerely
Tamra Speakman
Joshua Tree resident

(please keep below address private not public)
6379 Mountain View st.
Joshua Tree 92252
deeprwellness@gmail.com

From: [Ryan Keller](#)
To: [Planning Commission Comments](#)
Subject: Proposed County Redline
Date: Wednesday, February 2, 2022 10:13:55 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors, I am writing in regards to the proposed changes to the STR ordinance. I have been working in the desert region since 2013. I have been buying cabins and houses that sat vacant for years, places simply no one wanted. I am in the process of converting 3 rec cabins to SFRs in order to comply with the STR ordinance. The process is lengthy, akin to new construction, with one of the cabins having now been going on for a year. The proposed change to limit the amount of rentals per person I support, but it cannot be for properties purchased before a certain date, or for properties that have active permits in process. I bought an extremely run down 400ft2 cabin for \$340,000, currently in the permitting process, a structure no one would have paid or cared to fix up if not to be a short term rental. To finish these projects and not be able to rent them out, but rather sell them to some fly by night non resident Angeleno who would be allowed to rent them out makes no sense.

I implore the commission that the residents who have dedicated their lives for years to improving this area are not put into financial ruin by the jurisdiction of the area itself. Thank you for your consideration,
Ryan Keller

From: [Shelley Black](#)
To: [Planning Commission Comments](#)
Subject: Public Comment Regarding Short-Term Rentals
Date: Wednesday, February 2, 2022 6:36:01 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Afternoon:

My name is Shelley Black. I actually reside in the City of Big Bear Lake; however, I grew up in the unincorporated area of Big Bear City. I currently own two long-term rental homes in Big Bear City and I am concerned with the increased number of short-term rentals being approved in the Big Bear City area.

My concern is the increasing number of short-term rentals not only in Big Bear City but all unincorporated areas of San Bernardino County. These short-term rentals are changing the entire landscape of the beautiful areas San Bernardino County is known for.

Growing up in Big Bear City (and graduating from Big Bear High School), I enjoyed true neighborhoods with full-time neighbors who watched out for each other. They were neighbors who would help you in a pinch, loan you whatever you needed, and invite you over for dinner. Now, we have no idea who is next door. Are the people utilizing the short-term rentals screened to be sure they are not sex offenders, drug dealers, or worse? Today, I could not allow my son to be home after school, alone, while I worked because I would have no idea who is next door. Prior to the short-term rental boom, my neighbors watched out for him. That is what "permanent" neighbors do. Transients could care less.

As I am sure you are aware, the City of Big Bear Lake has been served with a Citizens' Ballot Initiative to limit short-term rentals. Currently, the City of Big Bear Lake has more short-term rentals than permanent residents. It would be a shame if the County followed suit. You have a chance to set an example and strike a balance.

In 2020, I retired from Bear Valley Unified School District. My position was the Executive Assistant to the Governing Board and Superintendent of Schools. For many years, Bear Valley Unified School District has experienced declining enrollment. This finally caught up with the district and it was necessary to close an elementary school. As business people and community members yourselves, you know a neighborhood school brings with it a sense of community. Many community activities revolve around schools; the schools bring people together. With the closure of this particular elementary school, students now must be bussed across the valley to the other two elementary schools. Students from a low-income housing complex, built directly across the street from the now closed elementary school, must ride a bus over ten miles one way to school every day. Before this elementary school closed, their parents walked them right across the street. The City now wants to utilize this closed elementary school for a music venue. Personally, I would rather see local children utilizing the playground for what it was built for.

As the number of short-term rentals grow, the number of long-term rentals or opportunities to purchase a home decrease. This depletes the workforce needed to support the guests renting

the short-term rentals as the workforce is unable to find places to live. Add to that the loss of community once a school is closed. The situation is completely out of balance.

People argue that Big Bear was created to be a destination resort. I plead with you to look into Big Bear's history. Let me help; my grandparents came to Big Bear in the 1920s. My grandfather was offered a job by the Maltby brothers to haul wood up the grade to build cabins. If you do not know the Maltby name, do your research. My grandfather was an integral part of the Peter Pan Woodland Club, worked tirelessly on water rights, and worked to develop the community of Big Bear City - not for tourism but for residents. Tourism was left to the lodge type facilities. My mother is also a graduate of Big Bear High School. Lately, she reminded me that in the 1940s, all businesses in the valley closed on Sundays as Sunday was a day for church and family. Does this sound like a town that was developed solely for tourism? The community grew to fill the needs of those living and working here. To now exploit that all for profit is sad and tragic.

We are seeking a balance. To close an elementary school, you must agree, is completely out of balance. A vibrant community would be building more schools to accommodate the residents who enjoy the ability to rent or even own their own homes. A community that is balanced to the point that it has the workforce to support the tourism it is inviting. How will tourism be supported with no workforce living in the valley?

A balance - not a ban - is what we are asking for. In your position, you owe this balance to the permanent residents who chose to call San Bernardino County their home.

Regards,

Shelley Black

From: [Jonathan Hume](#)
To: [Planning Commission Comments](#); [Rowe, Dawn](#)
Subject: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 6:59:44 PM
Attachments: [220202_Planning-Commission-Comments_Hume.pdf](#)

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Dear Planning Commissioners,

Please accept my written comments (attached PDF) for your Feb 3rd meeting.

These comments are regarding agenda item #4, "Development Code Amendment to add and amend various regulations to provide clarification and updates to Chapter 84.28 related to Short-Term Residential Rentals."

Thanks,
Jonathan Hume

CC: Dawn Rowe

Jonathan Hume
420 El Bandito Way
Twentynine Palms, CA 92277
jhume@pacbell.net

RE: Planning Commission Meeting Comment Feb 3, 2022, Project: PMISC-2020-00005

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT – STR REGULATIONS MUST REFLECT THESE DIFFERENCES

- There must be different STR rules and adjustments made for the Desert region versus the Mountain region.
- The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.
 - San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
 - The vast desert region of SB County is NOT Palm Springs.
 - The vast desert region of SB County is NOT Big Bear.
- The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - Parcels are primarily over 1 acre.
 - We are thinly populated.
 - We have plenty of parking on most of our properties.
 - We are spread out and have little traffic congestion.
- Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
- The county is attempting to shoehorn two very different areas into a single set of STR rules.

- Many STR regulations MUST have exceptions and allowances for the Desert region's unique geography and larger parcels.
- Heavy-handed regulation of Desert Region STRs cannot be driven by issues peculiar to Big Bear.

OCCUPANCY

- **I oppose the proposed change in the occupancy calculation.**
- Occupancy must continue to be based on habitable square footage, NOT bedroom count.
- Otherwise the outcome is absurd. For example, an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- Homes on large parcels (>1 acre) must be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

SINGLE STR PERMIT PER PARCEL

- **I oppose the proposed change which would limit STR permits to 1 per parcel.**
- The county should encourage residential construction of all types, including ADUs. The county should specifically encourage ADU construction by allowing an ADUs to be an STR in addition to a main house STR.
- On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- At a minimum – existing properties with 2 STR permits for both house and ADU, MUST be grandfathered in as a valid non-conforming use.

MINIMUM STAY

- **I oppose the proposed change to two-night minimum stay.**
- Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
- In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
- At a minimum, if any change regarding length of was made, single night stays Sunday through Thursday must continue to be allowed.

CHILDREN UNDER 12

- **I oppose the proposed regulation of guest children under 12.**
- As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

MAXIMUM PARKING

- **I oppose the proposed change to limit maximum parking.**
- In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

30 MINUTE RESPONSE BY PHONE

- **I oppose the proposed change to phone response time.**
- Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes. Sixty minutes remains reasonable and this regulation should be left unchanged.

YEARLY RENEWAL OF PERMIT

- **I oppose the proposed change to make the STR permit renewal annual.**
- Annual renewal fees would be an overly burdensome expense for owners with limited income.
- The change from biannual to annual is not tied to any announced regulatory goal. As such, it's a needless hassle both for Code Enforcement staff as well as STR hosts.

Thank you very much for your consideration,

Jonathan Hume

From: [Steve Bardwell](#)
To: [Planning Commission Comments](#)
Cc: [Duron, Heidi - LUS](#); [Board Meeting Comments](#); [HousingElements@hcd.ca.gov](#); [OPR-APR@opr.ca.gov](#); [Hallen, Gary](#); [Megan.Kirkeby@hcd.ca.gov](#); [Melinda.Coy@hcd.ca.gov](#); [housing@doj.ca.gov](#); [Bennet, Sydney@HCD](#); [cdrukker@placeworks.com](#); [tclark@29palms.org](#); [sstueckle@yucca-valley.org](#); [townclerk@yucca-valley.org](#); [APR@hcd.ca.gov](#); [Erik.DeKok@opr.ca.gov](#); [Brienne.Masukawa@opr.ca.gov](#); [Rowe, Dawn](#); [Cozad, Claire](#); [Assemblymember.Maves@assembly.ca.gov](#); [Assemblymember.TSmith@outreach.assembly.ca.gov](#)
Subject: Re: Short Term Rentals - San Bernardino County
Date: Wednesday, February 2, 2022 3:13:19 PM
Attachments: [MBCA 2 2 22 Housing Element and Short Term Rentals FINAL.pdf](#)
[MBCA Housing Element Update and Short-Term Rentals FINAL.pdf](#)
[lettertoirvine040819.pdf](#)
[Supervisor District Communities New Districts 2 2 22 \(work in progress\).pdf](#)
[Map of STRs by Zipcode 01312022.pdf](#)
[Map of SBCO Supervisorial New Districts 2022.pdf](#)
[Chart of STRs by Zip Code 1 27 2022.pdf](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planning Commissioners:

Attached please find our letter with substantive comments regarding the proposed amendment to the Short Term Rental ordinance.

We ask that you please also review the charts and maps attached, as well as the Statistics, below.

We recommend that along with these STR revisions, the County reinstates its pre-construction/pre-grading inspection with substantial fines for any grading activity done on the property prior to the inspection and prior to permit. This inspection should be done prior to plan check, so the inspector can see the existing site conditions, location of native plants, and any water courses and drainage concerns and educate and inform the builder/developer/owner as to the circumstances important to the site.

Thank you,

Statistics

Morongo Unified School District used to have 8,000 students enrolled. That number is now down to 7,600 according to Wayne Hamilton the MUSD Homeless Liaison.

Of that 10% are identified as homeless, which by the District definition includes unsheltered (living on the street), families that have doubled or tripled up, or inadequate and insecure housing. That is at least 760 students currently, as many do not come forward or identify as homeless.

Our Five County Supervisors have a very imbalanced workload and responsibility area

when looking at the unincorporated areas.

The area with the least unincorporated area is District 4, Curt Hagman's with only 3.51 square miles of unincorporated area. Compare that to Dawn Rowe of our District 3, who has 1,855 square miles of unincorporated miles to manage. This does not include the National Forests, BLM, Tribal, and City areas, just the unincorporated areas.

Curt Hagman has 12,786 people living in the unincorporated areas, Dawn has 100,431.

Curt has 0 identifiable communities in one Region in his District, just the residual land between cities. Dawn has at least 74 distinct communities spread out over 4 Regions that make up the county.

Curt has 0 STRs in his district, as the STRs are not allowed in the Valley Region. Dawn has 4,565 STRs spread out over the 2 Desert and the Mountain Regions under her care. This number is increasing by 20plus a day.

Joshua Tree has approximately 4,200 homes, and of that 856 are permitted or in process, and there are 3 to 14 new applications a day. That is a full 20% of our housing stock that are now short-term rental lodgings. The percentage is higher in the Mountains.

Joshua Basin Water District said they averaged 14 new water meters a year, for years. Last year they had more new meters in one year, than the previous 10 years combined. The vast majority of new construction are for STRs. Of these 100 or so acres (number not determined – just estimate) how many Fish and Wildlife permits have been pulled to move the many Joshua Trees that were in the way of some of these buildings? What about the Mojave yuccas and other plants and possible tortoise dens that are on the site?



Steve Bardwell
president, MBCA
steve@infinityranch.net

This is a moving target and the best that we can determine in a point in time. If we saw a zipcode mistake on EZOP, we added it to correct location. It is hard to determine how many are in review. All numbers are approximate, but to the best per the info we had.

Zip Code	Supervisor Dawn Rowe District 3 Communities	Active STRs w/ permit	STRs in Review	Total # of STR Lodgings	# of Housing units	STRS % of Community	vacancy per Housing Element Chart
Mountain Region							
		As of 1/21 to 1/26/22	As of 1/26 to 1/30				
92399	Oak Glen	1	0	1			
92305	Angelus Oaks	6	2	8			
92359	Mountainhome Village	1	0	1			
92339	Forest Falls	11	1	12			
92314	Big Bear City	887	131	1018	7575	1018/7575=13%	58%
92314	Erwin Lake	68	"	68			
92314	Baldwin Lake	11	"	11			
92314	Lake Williams	3	"	3			
92314	Moonridge	approx 142	"	142			
92315	Big Bear Lake	53	8	61			
92386	Sugarloaf	328	49	377			
92333	Fawnskin	71	8	79			
92341	Green Valley Lake	71	12	83			
92382	Arrowbear Lake	49	30	79			
92382	Running Springs	99	"	99			
92321	Lake Arrowhead CDP Cedar Glen	21	7	28			
92352	Lake Arrowhead/North Shore/Arrowhead Villas/Deer Lodge Park	813	126	939	8529	1083/8529= 13%	71%
92385	Skyforest	17	1	18		CDP total	
92317	Blue Jay	5	1	6			
92378	Rimforest	12	4	16			
92391	Twin Peaks/Agua Fria	66	10	76			
92326	Crest Park	14	0	14			
92325	Crestline/San Moritz/Valley of Enchantment/Mile High Park/Skyland	186	39	228			
92325	Lake Gregory/Arrowhead Highlands/Horseshoe Bend/	"	"	"			
92325	Valley of the Moon/Valley View Park	"	"	"			
92322	Cedarpines Park	9	3	12			
92358	Mountain Lytle Creek/Scotland	1	0	1			
Mountain Subtotal		2945	432	3377			
North Desert Region							
92398	Daggett	1	0	1			
92365	Newberry Springs	4	1	5			
92356	Lucerne Valley	3	3	6			
East Desert Region							
92277	Wonder Valley, Desert Heights,unincorp 29 Palms, Copper Mountain	108	12	120			
92252	Joshua Tree	792	64	856	4244	856/ 4244 = 20%	
92284	Yucca Mesa, Flamingo Heights, Landers	145	28	173			
92285	Landers	87	19	106			
92268	Pioneertown	72	8	80			
92256	Morongo Valley	49	12	61			
Morongo Basin Sub-Total		1253	143	1396			
Total Dawn Rowe STRs		4,206	579	4785			
Supervisor Paul Cook District 1 Communities							
North Desert Region							
92344	Oak Hills	1	0				
92345	Oak Hills	1	0				
92308	Arrow Bear Park, Apple Valley	7	5				
92307	Apple Valley	1	1				
92395	Victorville	3	1				
92342	Silver Lakes/Helendale	3	0				
93562	Trona	2	0				
89019	Sandy Valley	1	0				
92397	Mountain Region Wrightwood	28	9				
Total Paul Cook STRs		47	16	63			
Supervisor Janice Rutherford District 2 Community							
91759	Mountain Region Mt Baldy	1	1	2			
Supervisor Curt Hagman District 4							
Supervisor Joe Baca District 4							
DESERT AND MOUNTAIN ZIPS with none, Valley STRs not allowed							
92407	Devore	0					
92404	Arrowhead Springs	0					
92405		0					
92346		0					
91739		0					
92372		0					
92371	Phelan	0					
92344		0					

92395		0
92392	1 for Lake Arrowhead (must be owner of land) placed in 92352	0
92394		0
92301		0
92368		0
93516		0
93558		0
93528	Red Mountain	0
92310		0
92309	Baker	0
92364		0
92332		0
92363	near Needles	0
86403	Lake Havasu	0
92267	River area	0
92242	River area	0
92280		0
92304		0
92338		0
92347	Hinkley?	0
92311	Lenwood Barstow	0
92327	Daggett	0

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



April 8, 2019

John A. Russo, City Manager
City of Irvine
1 Civic Center Plaza
Irvine, CA 92606

Dear John Russo:

RE: Proposed Short-term Rentals and Boarding Houses Ordinance Amendment

The purpose of this letter is to assist the city in its decision making regarding the City of Irvine's proposed short-term rentals and boarding houses ordinance amendment, particularly the "boarding house" definition. In 2017, Governor Brown signed the 2017 Legislative Housing Package, which provides a renewed focus on housing, one of the most basic needs for every Californian. Chapter 370 Statutes of 2017, Assembly Bill (AB) 72, is one of the bills that was passed. AB 72 expands and clarifies the Department of Housing and Community Development's (HCD) enforcement authorities. HCD will review local government's actions and inactions, including program actions committed within an adopted housing element, to determine consistency or inconsistency with state housing law. If HCD makes findings of inconsistency, housing element compliance may be revoked and additional actions may be taken, including referral to the Attorney General's Office.

HCD's November 4, 2013 review found the city's adopted housing element in full compliance with state housing element law (Article 10.6 of the Government Code). As part of the housing element update, Irvine was required to provide an analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for persons with disabilities including land-use controls, building codes and their enforcement, site improvements, fees, and other exactions required of developers. (Government Code section 65583 (a)(5)).

In addition, Gov.Code section 65008 renders null and void any action that denies enjoyment of residence, landownership, tenancy or other interest in land to individuals based on protected classes, including intended occupancy of any residential development by persons of very low, low, moderate, or middle income. Local agencies are prohibited from discriminating based on protected classes including, race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, or genetic information of that person. Local agencies may not impose different requirements on affordable developments than those imposed on non-assisted projects, however they

may extend preferential treatment to affordable developments, such as reduction of fees.

As discussed in our phone call with the Manager of Neighborhood Services, after reviewing the proposed definition of “boarding house,” HCD is concerned certain provisions may impose unintentional constraints upon the availability of housing for persons with disabilities or other protected classes. The provisions of potential concern include:

- Additional scrutiny of those with separate rental agreements,
- Subjective elements of the “single housekeeping unit” definition, and
- Potential fair housing issues related to implementation of the definition of “single housekeeping unit,” including but not limited to different treatment of persons based on marital status, familial status, race, or nationality.

These provisions have the potential to impact housing programs that seek to provide independent living opportunities for special needs populations. Such housing could include housing with supportive services or shared-housing opportunities for seniors wanting to remain in their home, or persons with developmental disabilities wanting to live outside of an institutional setting. Depending on the individual needs of the renter, programs may require separate leases for each tenant residing in a residence or the tenant may be selected by an outside organization. While some of these programs may operate with governmental funding, others may be run by charities or non-profits utilizing alternative funding sources.

The proposed provisions may also disproportionately affect tenants based on familial or marital status, race, nationality, or have a disparate impact on those that are low-income. Even if unintentional, the burdens placed on citizens through the subjective administration of proposed provisions has the potential to invalidate the ordinance.

HCD appreciates the difficulty jurisdictions face in balancing competing interests when making land-use decisions and acknowledge the desire to address neighborhood concerns related to parking and noise. However, the city also has the responsibility to ensure that housing is available for all members of the community including those with special needs and those who are members of a protected class. If you have any questions concerning this letter, please contact Melinda Coy, of our staff, at (916) 263-7425.

Sincerely,



Zachary Olmstead
Deputy Director

John A. Russo, City Manager
Page 3

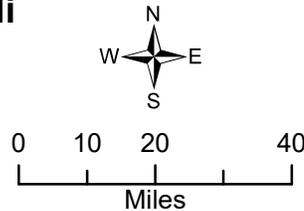
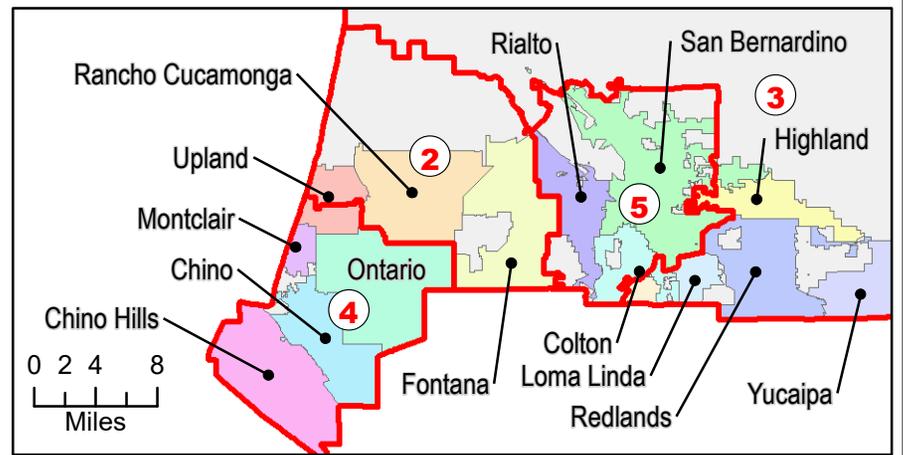
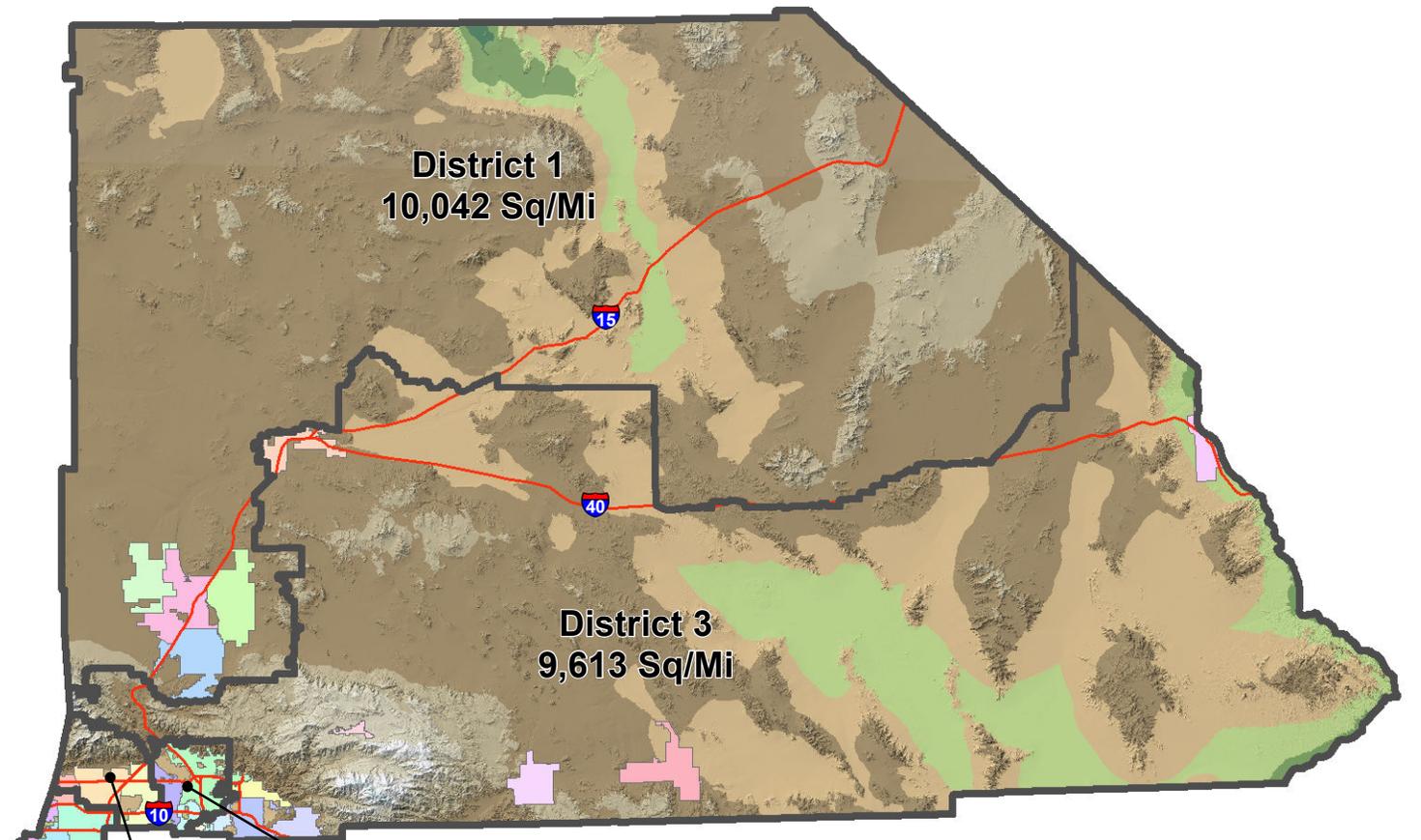
cc: Jeffrey T. Melching, City Attorney
Rutan & Tucker, LLP

Pete Carmichael, Director
Community Development

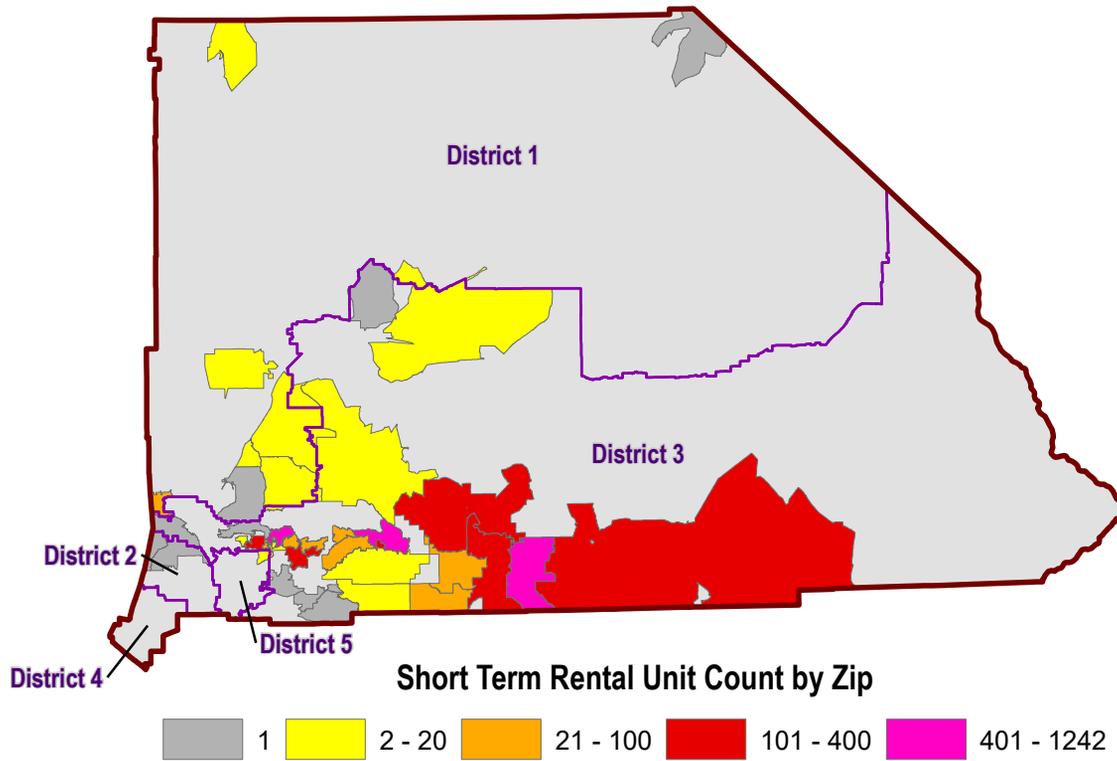
Steve Holtz, Manager of Neighborhood Services
Community Development Department

2020 San Bernardino County Supervisorial Districts

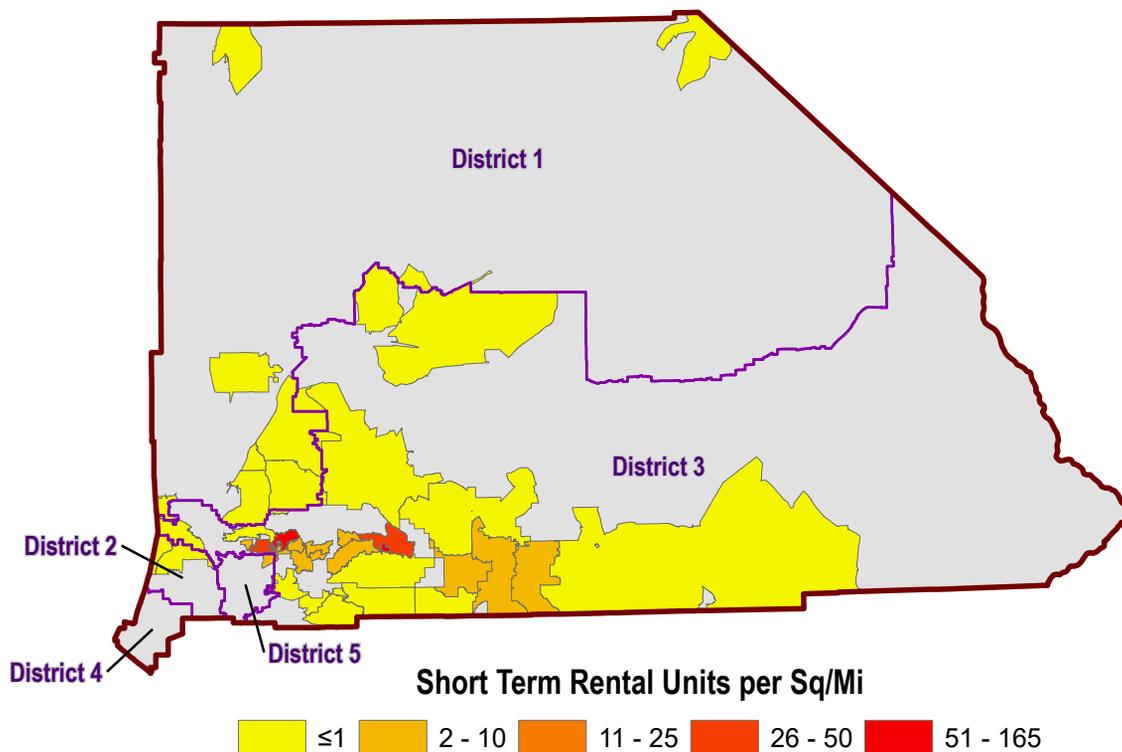
- Chino
- Chino Hills
- Colton
- Fontana
- Grand Terrace
- Hesperia
- Highland
- Loma Linda
- Montclair
- Needles
- Ontario
- Rancho Cucamonga
- Redlands
- Rialto
- San Bernardino
- Twentynine Palms
- Upland
- Victorville
- Yucaipa
- Adelanto
- Apple Valley
- Barstow
- Big Bear Lake
- Yucca Valley



Total Number of STR Lodgings by Zip



Total Number of STR Lodgings Per Sq/Mi by Zip





February 2, 2022

To: California State Department of Housing and Community Development (HCD), Housing Element
California State Governor's Office of Planning and Research (OPR), General Plan Guidelines
California State Attorney General, Housing Strike Force
County of San Bernardino Land Use Services Planning Department
County of San Bernardino Planning Commission
County of San Bernardino Community Development and Housing Department
San Bernardino County Supervisor Dawn Rowe
County of San Bernardino Board of Supervisors
City of Twentynine Palms
Town of Yucca Valley

Dear Reader, for your consideration:

Revisiting Our Concern

The San Bernardino County (SB County) Short-Term Rental (STR) Policies are currently being revised. Once Policies are adopted, they become Codes. For this letter we will use these terms interchangeably. The SB County Planning Commission will meet Thursday, February 3rd, to receive public input and recommend any changes, which if approved, will then be forwarded to the SB County Board of Supervisors for consideration. The County has released their proposed revisions for the current Short Term Rental rules.

<http://www.sbcounty.gov/uploads/LUS/PC/LUSPCStaffReportAmendmentSTRs.pdf>

The SB County Housing Element Draft will be reviewed on February 17th.

The Morongo Basin Conservation Association (MBCA) letter of October 19, 2021, that you received previously, is attached via email. The October letter introduces MBCA, our community, our situation, and discusses the linked relationship of STR Policies and Housing Element Policies, and the absolute necessity for consistency between the two. Currently, these Policies are demonstrably inconsistent. This current letter continues the conversation.

Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org

MBCA is a 501(c)3 non-profit, community based, all volunteer organization

The Greater Morongo Basin, along with the Mountain Communities have lost 20%+ of our housing to STRs in the space of just over 2 years, with dramatic effects on our communities. The STR Ordinance allowing the North and East Desert Regions to have STRs was adopted into the Development Code in November 2019. The Mountain Region was allowed to have STRs previous to this. STRs are not allowed in the more urban Valley Region.

A Work in Progress

It was made clear during hearings for the November 2019 STR Ordinance, that the STR Code was being implemented with the intent of revisiting policies over time, with respect to impacts, interpretation and enforcement.

The Board of Supervisors reviewed STR policies on June 22, 2021, as there were many problems evident by then. Yet, at this hearing there was no discussion of the impact that over 4,000 STRs have had on critical housing concerns in unincorporated communities of the County. Instead, the discussions focused on code violation fines, and facilitating the hundreds of illegal STRs to come clean and get permitted with no consequence. A moratorium was well justified at this point, to stop the bleed of our houses, and stop the displacement of long-term renters. A moratorium would have given code enforcement time to catch up on the over 1000 calls they had backlogged.

There are questions concerning potential conflicts of interest and policy decisions happening behind closed doors without the proper public review. Supervisor Paul Cook stated his concern about these issues at the May 18, 2021, BOS meeting. https://sanbernardino.granicus.com/player/clip/5416?view_id=13&redirect=true.

At 3:02:29, Supervisor Paul Cook says he supported these desert issues. He also said this:

“I am going to drop a dime on a lot of people. A lot of elected officials own Air BnB’s. I really wonder... this is a huge conflict of interest. How are they ever going to vote on something like this? I am wondering whether we can make that part of the policy of the County since this is a problem. And I am not going to name names or anything like that, but it is a real problem I think, in that sometimes you got to at least declare that you have an interest in this, if you are going to vote on something like this. And this has happened in the past, in the desert.”

3:06:00 to 3:06:40, Supervisor Janice Rutherford, who still had the Mountain Communities in her District at the time, (Supervisor Rowe had to leave the meeting) stated, paraphrasing her quote:

I want to reiterate Supervisor Rowe's points, as the district with the second most impact by short term rentals we have to figure out how to get a handle on it, and it certainly has changed dynamics in the last year or two. We need to spend time to understand more about that to address the needs in the communities. We also know we have a great housing shortage, and to the extent that short term rentals are imposing on workforce housing or even just primary housing on the upper ends of things, that is part of the equation need to talk about that.

3:28:40, Supervisor Rutherford:

"Supervisor Rowe and I were discussing the STR issue prior to this meeting... One thing we pondered on was a moratorium on STR permits. We believe this might give us time for staff to adequately study all the issues raised by the community and that she mentioned earlier, as well as figure out how we code shift code enforcement budget opportunities on how we might address those issues. Ask for concurrence to put on agenda so Supervisor Rowe and I can discuss with you." (loose quotes here and below)

CEO Hernandez :

We did have conversations about an approach, we will make sure to look at the item and bring back an approach to lay-out for the Board.

Supervisor Rutherford:

There are local control issues we can discuss. That breathing room might give us a good opportunity to handle it correctly.

But then, nothing. Not a word more was spoken in view of the public about discussing the critical need for a moratorium.

Since then, our 3rd District Supervisor Dawn Rowe (with 4,785 STRs in her new District boundaries), her staff, and the Planning Staff have worked hard trying to find a balanced solution to all the problems the community is facing due to STRs, as well as providing business and job opportunities.

We appreciate all the efforts that the have been taken, as some of the revision proposals would help neighborhood concerns with occupancy limits and parking regulations being tightened up. There is a stated intention of limiting business own-

ership, but the revisions as written do not do this in reality. The bottom line is we do not see these proposed 2022 revisions as addressing the housing crisis caused in good part by the current STR Codes.

Mandate to Protect Community Housing/Jobs Balance

The Short Term Rental Policies must be consistent with the Housing Element Policies.

We see no stated intention to protect the housing in the community, which the County is mandated to do per the State’s requirements of the Housing Element, in these STR Revisions:

§ 84.28.010 Purpose. The purpose of this Chapter is to establish a permit procedure, and maintenance and operational standards, for the use of legal residential dwelling units located in the Mountain and Desert Regions as transient occupancies, to ensure the health and safety of occupants, guests, and the surrounding residential neighborhood, and to minimize negative secondary effects associated with such use.

We see no upper limits to the amount of STRs. Neighborhoods that used to house families with kids, have now lost 20% of the family housing to STR lodgings. Is more loss, okay? How long will it take before this neighborhood elementary school closes like one has up in Big Bear? What kind of psychological effects has this displacement had on all these kids and their parents? What does it do to those that remain, to see so many leave, and live amongst a revolving door of strangers, when they moved into the neighborhood to live surrounded by neighbors and have a sense of community?

The County is mandated to preserve the housing/jobs balance. Yes, the STRs provide jobs, but if the cleaners can’t afford to live in their own community and are soon to be displaced by their landlords, who is going to clean the STRs? How about the restaurants, where are their workers going to live so they can wait on the customers? These policies are hurting local business, as much as helping them.

Workers are travelling up to the Mountains from down in the Valley or from the North Desert to be these workers. Jobs for these individuals, should be where they live, and not making them drive a dangerous commute every day. This contribution to greenhouse gas emissions, should have been part of an obviously necessary Envi-

ronmental Impact Report (EIR) review of the proposed Ordinance back in Nov 2019, and again, now, especially because the effects are now known, not just hypothetical.

The responsibility of the County extends to more than just protecting the communities' housing. The County also has the responsibility to protect the communities' opportunities. Our community's opportunities have been taken by outside investor LLC's inflating our once affordable housing markets out of reach, so now our middle class cannot participate in this opportunity as they cannot afford to buy that second home, let alone their first home. Since the community is bearing all the costs for this market, it should be for the community to participate in and profit from this market, thus also keeping it a manageable size.

State Guidance

As time is of the essence, MBCA requests the State's immediate attention and recommendations to bring our County's STR Policies and Codes into consistency with the Housing Element, Zoning and Land Use Designations, and the rest of our Countywide Policy Plan (General Plan). We see the role of the California State Department of Housing and Community Development (HCD) as critical due to the housing crisis situation that has been created; a situation that can also be remedied by good policy decisions.

HCD acted previously to help guide the City of Irvine into writing consistent policies, in an April 8, 2019, letter "RE: Proposed Short-term Rentals and Boarding Houses Ordinance Amendment". (Attached in email.)

HCD wrote to Irvine exercising authority over issues just like we in the unincorporated SB County are experiencing, stating (in this case referring to the boarding houses):

"The proposed provisions may also disproportionately affect tenants based on familial or marital status, race, nationality, or have a disparate impact on those that are low-income. Even if unintentional, the burdens placed on citizens through the subjective administration of proposed provisions has the potential to invalidate the ordinance.

HCD appreciates the difficulty jurisdictions face in balancing competing interests when making land-use decisions and acknowledge the desire to address neighborhood concerns related to parking and noise. However, the city also has the responsibility to ensure that housing is available for all members of the community including those with special needs and those who are members of a protected class.”

The HCD Letter began with this introduction:

“The purpose of this letter is to assist the city in its decision making regarding the City of Irvine’s proposed short-term rentals and boarding houses ordinance amendment, particularly the “boarding house” definition.

In 2017, Governor Brown signed the 2017 Legislative Housing Package, which provides a renewed focus on housing, one of the most basic needs for every Californian. Chapter 370 Statutes of 2017, Assembly Bill (AB) 72, is one of the bills that was passed. AB 72 expands and clarifies the Department of Housing and Community Development’s (HCD) enforcement authorities. HCD will review local government’s actions and inactions, including program actions committed within an adopted housing element, to determine consistency or inconsistency with state housing law. If HCD makes findings of inconsistency, housing element compliance may be revoked and additional actions may be taken, including referral to the Attorney General’s Office.”

We ask that HCD compose a similar letter to SB County to “assist the {County} in its decision making regarding the {County’s} proposed short-term rentals ordinance”. HCD could encourage the County to allow locally owned residential-scale STRs with limits and oversight in residential zones and sunset the out-of-town LLC absentee investor STRs, once their permits expire. These owners still own their asset. They can either sell the house, move in themselves, or rent out to long-term renters.

The STR “use” is subject to a special use permit, it is not a guaranteed use of that zone. The permit was short-term just for this purpose, to allow for course corrections either at the individual property level, or at the policy level.

Primary residency is established for tax purposes, voting purposes, school attendance purposes, it is common. Just as elected officials can’t have conflicts of interest when voting on issues, or carryout insider trading, it is about establishing fair boundaries for the welfare of a community. This also helps business grow in a healthy long-term manner, not create a “bubble” as we have now.

Jurisdictions throughout California are completely prohibiting STRs, however that would go too far for our community and have negative results. The goal is to create a balance for all members in the community.

Counties and Cities have the power to zone to protect the welfare of the community, and they are required to write a balanced and consistent General Plan, for the same purpose. To illustrate this, the County chose not to allow the STRs in its Valley Region, to protect housing, one can assume. Community members of the Mountain and Desert know how serious this situation is and how much damage the amount of STRs have created, our welfare IS at stake.

Impacts Continue in Our Communities

In Joshua Tree, we have 856 STRs that are permitted or in the process. 856 STRs/4244 SFRs = a full **20%** of our housing units that are no longer housing but are now short-term rental lodgings. The County is receiving an averaging about 10 to 25 new applications a day across the County. With 3 to 14 of those a day for Joshua Tree. Should this pace continue unabated, we could be at 50% STRs in 2 more years.

The neighborhood that is mapped in the MBCA October 19th letter had 76 STRs in October, and it now has a net new 16 STRs, so this neighborhood now has 92 STRs, which is 20% of the sample neighborhood. At least four of the approximately six new homes were immediately turned into STRs.

Wayne Hamilton, the Homeless Liaison for our school district, just stated on a Friday 1/21/22 radio talk show on Z107.7fm, <https://podcasts.apple.com/us/podcast/ep-255-w-wayne-hamilton-homelessness-specialist-for/id386367587?i=1000548616012> that 1/3 of the houses are now STRs in the area. 10% of the Morongo Unified School District (MUSD) are identified as homeless, by the McKinney Vento definition, which includes families that are doubled and tripled-up. The school district enrollment has decreased from about 8,000 down to 7,600. Approximately **760 kids are identified as homeless** in MUSD, and that is only those who have come forward, many others have not. Many have simply left.

The unincorporated Mountain communities are being hit hard as well, with at least 2,940 STRs with another 224 (approx.) in review, this is on top of all the vacation

homes. There is such a population loss that an elementary school in Big Bear is closing, and Rim of the World School District is also facing large declines. Lake Arrowhead is having a hard time finding housing for its workers, as we are here in the Morongo Basin.

The City of Big Bear Lake is working on a voter initiative to limit the number of STRs as their density is approaching 50%. Starting up a voter initiative similar to this was suggested to us as an option to fix the policy problems, as opposed to the County responsibly revising the policies now. Big Bear Lake has 3000 registered voters, and we have 1,133,000 registered voters in our County as there is no distinction between incorporated and unincorporated populations for countywide elections. The vast majority of voters live down in the cities in the Valley Region. Thus, a successful voter initiative here is highly unlikely.

Plea for State Guidance and Oversight

Planning Law and CEQA exist to protect the rights and safety of communities. The HCD has been given authority to exercise its oversight authority to enforce the consistency requirements that are so wisely encoded in law. The State Attorney General already has this authority. It has now created a “Housing Strike Force”, just this reason. <https://oag.ca.gov/housing>

Some policy guidance from HCD could encourage and hopefully ensure more community-friendly and housing-friendly decisions, that bring the jobs/housing equation back into balance for the unincorporated communities of San Bernardino County.

We would hope the first recommendation is that the County places a moratorium on new permits and renewals, while it reviews its policies, performs the necessary traffic and environmental studies, hires new code enforcement officials to handle the current load and addresses the backlog of complaints.

This action on the County’s part, would allow the HCD to have confidence that the County is indeed trying to bring the situation under control. The HCD can then approve the County’s Housing Element 2021-2029 6th Cycle, with the condition that the STR Policies are brought into consistency for the welfare of the County’s unincorporated communities.

Sincerely,

The Morongo Basin Conservation Association

Steve Bardwell, President

Pat Flanagan, Director

Arch McCulloch, Director

David Fick, Vice President

Brian Hammer, Director

Gary Stiler, Director

Laraine Turk, Secretary

Sarah Kennington, Director

Stacy Doolittle, Director

Cathy Zarakov, Treasurer

Janet Johnston, Director

References:

This is the County's relatively new site on STRs: <https://str.sbcounty.gov/>

This page has more info specific to what is allowed. <https://str.sbcounty.gov/about-str/>

This is the most recent code version. Google can lead one back to old versions, but this shows the revisions adopted in 2021.

<https://cms.sbcounty.gov/Portals/5/CodeEnforcement/ShortTermResidentialRentalsOrdinance.pdf>

Housing Element Draft information:

<https://cms.sbcounty.gov/lus/Planning/LearnMore.aspx>

San Bernardino County Housing Element Draft:

http://www.sbcounty.gov/uploads/LUS/HousingPlans/CWP_PolicyPlan_HE_2021_Nov_draft.pdf

San Bernardino County Housing Element Technical Report:

http://www.sbcounty.gov/uploads/LUS/HousingPlans/HousingElement_CWP_TechReport_Draft_2021_Nov_HCD.pdf

Community Member maps of the STRs:

San Bernardino County Short Term Rentals (Unincorporated). This shows the concentrations in communities.

<https://www.google.com/maps/d/u/1/viewer?mid=1hdWJvigDt7dVc-vzDwL3O9hzusXbCGEa&ll=34.124082158241215%2C-116.34562666245444&z=17>

Short Term Rentals in Unincorporated SB County. Has whether active or in process breakdown.

<https://www.google.com/maps/d/u/1/viewer?mid=1jyONztdmqJLpAdyd1QWzizju6d5z82j&ll=34.115614583464975%2C-116.33469666811793&z=17>

Community Action Guides (which are not adopted land use documents, that replaced the adopted into code Community Plans in Fall of 2020)

<https://countywideplan.com/communities/>



October 19, 2021

To: California State Department of Housing and Community Development (HCD), Housing Element
California State Governor's Office of Planning and Research (OPR), General Plan Guidelines
County of San Bernardino Land Use Services Department
County of San Bernardino Community Development and Housing Department
Town of Yucca Valley Community Development Department
City of 29 Palms Community Development Department

For your consideration:

Who We Are

The Morongo Basin Conservation Association (MBCA) is a community-based non-profit that is dedicated to preserving the economic and environmental welfare of the Morongo Basin located in East Desert Region of San Bernardino County (SB County).

The Morongo Basin is a family of unique communities connected by Highways 62 and 247, bordered by Joshua Tree National Park, Sand to Snow National Monument, and the Marine Corps Air Ground Combat Center of 29 Palms. The Morongo Unified School District (MUSD) boundaries essentially align with the Morongo Basin's and cover as much territory as the State of Rhode Island. The Basin residents number somewhere between 64,000 to 71,000 people.

The Morongo Basin includes the "Unincorporated Communities" of Morongo Valley, Yucca Mesa, Pioneertown, Rimrock, Pipes Canyon/Gamma Gulch, Landers, Flamingo Heights, Copper Mountain Mesa, Joshua Tree, and Wonder Valley. These communities are included in the current SB County Housing Element Update as well as the SB County Short-Term Rental (STR) Ordinance. You can see a listing of the 73 +/- "Unincorporated Communities" here at <http://countywideplan.com/cp/> that fall under the widespread SB County Land Use Service's jurisdiction, which is responsible for 137,487 households (as of 2019). The number is not clear, but approximately 34,555 of these are vacant vacation homes, (34,555/ 137,487 = 25% of all households).

Anchoring the Morongo Basin is The Town of Yucca Valley (pop.22,146) and the City of Twentynine Palms (pop.24,966). Both are incorporated with their own Community Development Departments managing their respective Housing Element Updates and vacation Short-Term Rental (STR) Ordinances.

Our Concern

All three jurisdictions responsible for the housing of the Morongo Basin are currently updating their Housing Elements as required. All three are currently also reviewing their Short-Term Rental (STR) Ordinances due to so many community issues stemming from the explosion of STRs in our

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Basin. The identity crisis and turmoil caused by such extreme and rapid change like we have witnessed over these recent years, serves as a case study in how a jurisdiction's STR Ordinance, Housing Element, and General Plan are all intricately linked and how consistency between them is crucial.

The following is a request for the State Department of Housing and Community Development (HCD) and the Governor's Office of Planning and Research (OPR) to offer guidance and oversight for jurisdictions grappling with this complex relationship. Short-Term Rentals (STRs) were not a huge factor 8 years ago during the 5th Housing Element Cycle Update, but with the growth of smart phones, apps, and vacation rental platforms, STRs now have a significant impact on many communities across the State, directly affecting housing.

Housing Displacement and the Loss of Community

We have seen in our Morongo Basin a mass housing displacement of long-term renters caused by owners deciding to sell. One local rental agency, in the last 18 months, has had to make that horrible call to 33 families to inform them that they had to move because the owners were going to sell. With much effort, the agency could only re-home 12 of those families.

It is easy to blame the pandemic and that has indeed exacerbated the effects, but both the Marines and the Morongo Unified School District (MUSD) Homeless Liaison informed SB County of this housing shortage and that it was seriously impacting their respective families. This was months before the SB County STR Ordinance was adopted in November of 2019. They specifically named the shortage as being caused by the burgeoning STR market reducing available housing and increasing rents and home prices.

Later, in January 2021, the MUSD Homeless Liaison reported that a grant assisted 85 local families with housing crisis situations. Due to the lack of homes in the Basin they were forced to find housing for 6 of those families hundreds of miles away in Apple Valley, Blythe, and Needles. The crisis has accelerated since then, and that grant ran out. Displaced families are either doubling up with others or have left the Basin, and often the State, to find more affordable homes.

Some homeowners took advantage of the market to "cash out". They then left, taking that benefit with them as opposed to reinvesting it in the community. These departures also take away much needed services and skills like in-home daycares, nursing aides, and construction laborers. Each young adult that leaves is taking all that cumulative community investment in them, with them: all the library events, soccer teams, bookfairs, and church camps. There is an immeasurable effect from such an exodus, affecting generations.

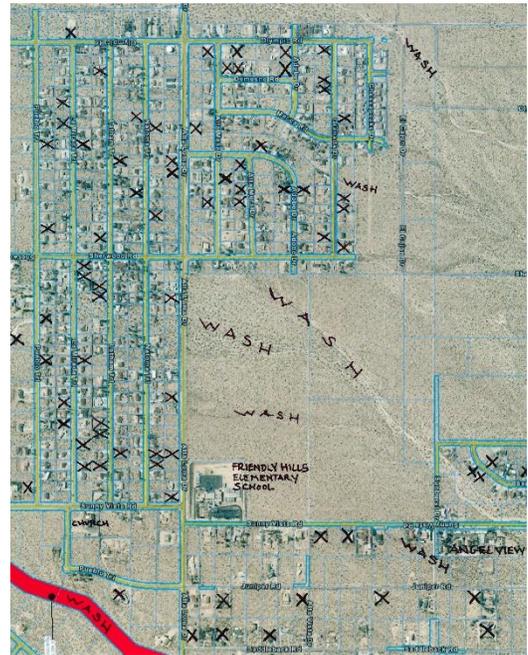
Outside commercial interests with significant financial resources, attracted by the "open" STR market, have contributed to inflating the market with their easy ability to out-bid our locals. Even those locals that have means are now priced out of benefiting from the local STR market in their own community – the community they helped build up with years of invested sweat equity and contribution.

A Neighborhood Case Study

Over just the last three years, Friendly Hills Elementary School in Joshua Tree (one of 11 elementary schools in MUSD) has dropped from the usual enrollment of 350 down to 260 – a 25% reduction, with housing displacement being the main reason. This map on the right is part of the neighborhood surrounding this school.

There are 76 permitted STRs in this view. This neighborhood is now comprised of 16% lodgings. But this is a moving target approaching 20% when accounting for homes on the market, newly purchased and newly constructed homes in the process of converting to STRs, and some lodging businesses operating illegally.

Consider the impacts on this neighborhood if a 120-room motel was built instead of all the individual STRs. Such a project would not be allowed in this residential zone without a zoning change and California Environmental Quality Act (CEQA) review of impacts and review for consistency with General Plan and Community Plan goals and policies. Imagine if to build the motel, 76 homes had to be demolished leading to a 25% reduction in the elementary school enrollment. There is little chance that this project would pass.



Unlike the 76 STRs now, the motel developer would pay a developer impact fee towards improving the already dangerous intersection at that school. This improvement has not happened with the current STRs, as Joshua Tree gets none of the Transient Occupancy Tax, but they do get all the traffic. The motel would also have to be made accessible to all of the public, following ADA regulations. Much of this neighborhood floods, and many new owners are not aware of the dangers. Some homes are literally sitting in washes. This neighborhood is dense with desert plants and wildlife, including many Joshua trees. Any development should be carefully considered.

Community Decline

The net enrollment of our Morongo Unified School District (MUSD), where 70% of the students are classified as low-income, has dropped by 400 to below 8,000, depriving the District of much needed funding. With less funding, services and options decline for students. Big Bear, our sister community up in the mountains, is closing an elementary school due to declining enrollment, as they have their own serious struggles with the STR market. There is no surer marker of a community on the decline than a shortage of workers, decreasing population, and decreasing school enrollment. According to the Census, Joshua Tree lost close to 1000 people since 2010, and according to the Draft SB County Housing Element, we have over 700 STRs.

Are we witnessing the start of a “Cycle of Decline” for the Morongo Basin?

The Role of Planning

Government planning studies are done just for this reason: to inform and forewarn communities of such negative trends, so preventive decision-making can mitigate the causes and prevent community deterioration. The Housing Element and the Annual Progress Report exist, just for this purpose.

The September 9th, 2021, San Bernardino County Planning Commission Staff Report states that the Housing Element's *"purpose is to ensure that current and future housing needs for all residents in the community are addressed. It provides goals, policies, and actions to maintain and improve existing housing, and accommodate the County's fair share of housing growth needs."*

The Purpose of the Housing Element is to preserve existing affordable housing and to encourage planning for future affordable housing by removing or rectifying "constraints" or "barriers" to these goals. As illustrated by the Morongo Basin, unrestrained investor fueled STR markets in some communities have moved past acting as a "constraint" to affordable housing, as they are actively depleting or hijacking a community's housing stock thereby displacing residents.

The Role of Zoning

The Housing Element, Planning Documents (General Plan, Development Code) and Zoning exist to create and protect spheres of opportunity for various scaled activities, protecting and buffering zones from incompatible uses. This maintains balance in a community while meeting its various needs, so that the community may prosper in the present and into the future.

The residential zoning designation exists in order to preserve a neighborhood for housing and to safely maintain the well-being and quality of life for the residents. Zoning establishes a guardrail which protects residential scaled activities carried out by individuals with residential scaled incomes and resources from being "steam-rolled" by commercial interests fueled by the power of their commercial scaled resources.

In the commercial sphere, for a local business to thrive, or even exist, it cannot compete with Walmart for the same piece of land. That is why in SB County we have a "Neighborhood Commercial" zone as distinct from "General Commercial" zone, to buffer incompatible uses and to protect spheres of opportunity for various sized businesses. Residential zones also exist to protect a residential sphere of opportunity for family-scaled home-based businesses. A lodging business in a residential zone, to be compatible with its residential neighbors, must be on the scale of a local business owned by local residents.

Communities should be able to decide if STRs will work for them, and to what extent. They can specify parameters that suit their specific neighborhoods and codify these decisions in their Community Plans and General Plans. Land use distinctions are designated for a reason, and similar distinctions can be written and adopted for short-term rentals, so their benefits outweigh their impacts on a community. There is potentially a good balance to be found.

“Consistency” Oversight

To achieve this ideal planning balance, all Elements, Goals, and Policies of the General Plan and Community Plans, and Implementation in the Development Codes, Zoning, and all Planning Decisions and Actions are legally required to be internally and externally consistent within themselves and with each other. You cannot advocate for housing preservation in one document, and then create the conditions for mass evictions and housing displacement in another.

The Housing Element is a required Element of the General Plan for all jurisdictions. A County or City must have an adopted and certified Housing Element to qualify for housing programs and funds from the State. HCD has oversight and approval authority over jurisdictions’ Housing Element Update and Annual Progress Reports for just this reason: to protect housing.

If a STR Ordinance removes the protective guardrail between zones and directly, or indirectly, gives commercial interests incentive to steam-roll residential community members’ opportunities and causes mass displacement, the Ordinance subverts those protections inherent in zoning. The Ordinance may be in violation of Planning Law and is certainly out of consistency with the Housing Element.

With this clear inconsistency, we question how the State can approve that jurisdiction’s Housing Element until they revise their STR Ordinance into consistency with the Housing Element per the “consistency requirement” encoded in State law.

If a STR Ordinance is currently contributing to significant housing displacement, the HCD has the responsibility to recommend that those jurisdictions place a moratorium on new short-term rental permits, stopping the cycle of decline before it can take full root. A grace period to extend the Housing Element Update deadline would relieve jurisdictions of the threat of funding loss and encourage the timely review of their STR Ordinance so that they can correct any inconsistency and bring the STR Ordinance into balance with the Housing Element.

Points and Recommendations

Please consider these points and recommendations to strengthen the Housing Element Update and Annual Progress Report (APR) requirements in order to achieve more beneficial results:

1. STRs are “lodging” for tourists not “housing” for community members.
2. STRs are not “vacant” houses sitting there waiting for community members to move into. STRs must be a specific category in the Housing Element Update and on APRs, separated from the “vacant” category, so that there is no confusion as to the quantity of housing that is indeed available for homebuyers or long-term renters to find shelter in, in a community. This misrepresentation could mislead those not familiar with the true circumstances, and thus decrease funding opportunities meant to alleviate the very problems the STRs are creating.

3. STRs require their own specific line item in the “Tenure” Table.

“Tourist-Occupied STR Lodging/Vacation Home” could be added on the fifth line of the below Table 2-14 from the “SB County Draft Housing Element 2021- 2029”. 34,555 would be shown in the new line. It is unclear if all those vacation homes are also STRs. The “Vacant (other vacant)” would then represent the reality that there are only 5,000 units (per the text, page 12 to 13, of the Draft Housing Element) sitting vacant for potential housing. This would clarify that a full 25% of the Unincorporated Communities’ housing stock is now lodging, not housing.

As it is now, the vacancy rate looks tremendously high at 31% at first glance*. This is very different from the reality that the actual available vacant housing and rentals rates are around 1 to 2 % each. This shows a very tight and thus inflated market. A healthy optimal “vacancy” rate for housing and rentals is given of 2% and 6%, respectively, established as a guideline to assure there are housing options for both renters and homebuyers of various income levels.

Table 2-14 Housing Tenure and Vacancy in 2019

Housing Tenure/Status	Unincorporated Area		Total County Area	
	Units	Percent of Total	Units	Percent of Total
Owner occupied	62,979	38%	380,281	53%
Renter occupied	32,247	20%	255,760	35%
Total occupied	95,226	20%	636,041	88%
Vacant (unoccupied)	42,261	27%	84,716	12%
TOTAL	137,487	100%	720,757	100%
Vacant (for rent)	1,671	1.0%	10,649	1.5%
Vacant (for sale)	2,311	1.4%	6,710	0.9%
Vacant (other vacant)	39,555	24.1%	67,357	9.3%

Source: American Community Survey, 2019 5-Year Estimates

http://www.sbcounty.gov/uploads/LUS/HousingPlans/HE_PrelimDraft_ComProfile_20210914.pdf

* It seems the % are not correct in this chart. The Owner Occupied is 45% +Renter Occupied is 24% = Total Occupied is 69%. Total Vacant is 31%: The STR Lodging is 25%. Vacant for rent is 1.2%, Vacant house for sale is 1.7%, Vacant Other is 3.6% +/-

4. Account for STRs within a community and/or regional framework, so that the impacts to that specific community are clear and not diluted. The housing/rental/ STR situation in the Mountains does not directly affect the Morongo Basin, so our numbers should be shown separately from the Mountain, the Valley, and the North Desert Region which is many miles away.
5. Current rents and current housing prices must be utilized on the APR form, to determine real world affordability. Affordability is based on what can be earned in that community to pay rent or mortgage, and what the costs of living are there. The standard utilized for measure of affordability in the Housing Element should not assume that all families must be “cost burdened” nor should it assume they must live in an “overcrowded” living situation, per HUD definitions.
6. New construction must declare its use (single family residence, garage, barn, office) when applying for a permit. If the new construction is intended to be an STR, it should be declared as

such. That new structure would be listed on the APR specifically as an STR. If it converts to housing, that change of use can be updated in future APRs or Housing Elements.

7. In order to identify ideal sites for new affordable housing, group sites by community in the Site Inventory of the APR. The sites can then be more efficiently compared and considered alongside the hazards, local conditions, and goals of that community as shown in their General Plan and Community Plan.
8. We encourage OPR/HCD to provide guidance on how jurisdictions can integrate STRs responsibly into their existing community fabric and economies. For example, the balance that may work best for the Morongo Basin could be allowing only resident owned STRs. This would still provide the jobs afforded by the STRs but would slow the bleeding of our precious community-built equity to outside commercial interests. Profits would stay local and get reinvested in other local businesses on a daily basis, as well as engender contributions to sports teams, schools, churches, animal shelters, etc. Local owners, who are directly accountable to their neighbors, tend to have years, if not generations, invested in the community and have the shared interest of protecting their community as do surrounding neighbors. Locally owned STRs create more interesting, “grounded”, character-fueled unique opportunities for tourists of various economic levels.
9. Guidance can assist jurisdictions in analyzing all factors, short-term and long-term benefits and costs, of STRs on the community. Help the communities look at the STRs in terms of maintaining a healthy jobs/housing balance, along with staying within the vision of the community.

Protecting the well-being of their own community’s residents and workforce is the primary responsibility of Cities and Counties. The Department of Housing and Community Development has the authority to act, Cities and Counties have the power to zone, the Attorney General and citizens can litigate for this same protective reason. Planning Law exists to avoid housing disasters and community decline just like our Morongo Basin is now experiencing.

We hope these points offer suggestions in a more positive and productive direction.

Sincerely,

The Morongo Basin Conservation Association

Steve Bardwell, President
David Fick, Vice President
Laraine Turk, Secretary
Cathy Zarakov, Treasurer

Pat Flanagan, Director
Brian Hammer, Director
Sarah Kennington, Director
Janet Johnston, Director

Arch McCulloch, Director
Ruth Rieman, Director
Stacy Doolittle, Director

New 2022 San Bernardino County Districts

FIRST DISTRICT - Paul Cook

4 Cities	Population
Astoria	34,877
Apple Valley	73,363
Hesperia	97,312
Victorville	128,353

4 City's Population	345,753
Total Population	430,041
SQUARE MILES TOTAL	10,042
percent of County square miles	49.94%

10 School Districts

Trona, Barstow, Silver Valley, Baker Valley, Apple Valley, Oro Grande, Heleldale, Victor Elementary, Hesperia, Snowline Joint

SECOND DISTRICT - Janice Rutherford

2 Cities	Population
Fontana	120,033
Rancho Cucamonga/Etiwanda/Alta Loma	187,757

2 City's Population	413,925
Total Population	441,285
SQUARE MILES TOTAL	177
percent of County square miles	0.88%

6 School Districts

Fontana, Etiwanda, Cucamonga, Central, Alta Loma, Upland

THIRD DISTRICT - Dawn Rowe

12 Cities	Population
Barstow	23,274
Big Bear Lake	6,304
Colton (shared with 5) 1/3	17,882
Grand Terrace	12,287
Highland/East Highland	54,574
Loma Linda/Bryn Mawr	24,010
Needles	4,964
Redlands	72,418
San Bernardino (with 5) 1/3	72,382
Twentynine Palms	25,040
Yucaipa	53,499
Yucaipa Valley	21,389

12 City's Population	330,806
Total Population	431,037
SQUARE MILES TOTAL	9,613
percent of County square miles	47.81%

10 School Districts

Morongo, Needles, Lucerne Valley, Bear Valley, Rim of the World, Barstow, Silver Valley Unified, Redlands, Yucaipa-Calimesa, San Bernardino

FOURTH DISTRICT - Curt Hagman

5 Cities	Population
Chino	80,630
Chino Hills	78,493
Montclair	40,470
Ontario	176,325
Upland	77,674

5 City's Population	428,124
Total Population	440,910
SQUARE MILES TOTAL	141
percent of County square miles	0.70%

4 School Districts

Upland, Ontario-Montclair, Mountain View, Chino Valley

FIFTH DISTRICT - Joe Baca

4 Cities	Population
Colton (shared with 3) 2/3	80,630
Rialto	102,743
2/3 of San Bernardino/Arrowhead Sprines	144,763
San Bernardino Intern. Airport	

4 City's Population	359,989
Total Population	436,879
SQUARE MILES TOTAL	134
percent of County square miles	0.67%

3 School Districts

Colton, Rialto, San Bernardino

Below Unincorporated Communities are under the Jurisdiction of Land Use, Code Enforcement, and the Housing Element/General Plan/Development Code/Community Plans, and are the Planning Commission's responsibility. The above cities are not.

Planning Commissioner Jonathan Weldy
Unincorporated 19.6% of pop. **

SQUARE MILES UNINCORPORATED UNDER COUNTY JURISDICTION.

of permitted STRS
of Planning Commission Actions 2020, 2021 shown as if in new Districts

Unincorporated Communities
11 Community Action Guides (LAG's) in

3 Regions
North Desert: Baker CAG
North Desert: El Mirage CAG
North Desert: Heleldale/Silver Lakes CAG - 3 STRs
North Desert: High Desert Communities CAG
Mountain View Acres
Spring Valley Lake - 3 STRs
North Desert: North Desert Communities CAG
Barstow Heights
Hinkley
Hodge
Kramer / Kramer Junction
Lenwood
Red Mountain
North Desert: Oak Hills CAG- 92345 - 2 STR
Baldy Mesa (Oak Hills? Or Victorville?)
North Desert: Oro Grande CAG
North Desert: Phelan/
Pinon Hills CAG
North Desert: Trona CAG - 2 STRs
Agua (Searles Valley)
Mountain: Wrightwood CAG - 28 STRs
West Cajon Valley, Airay, Cajon Junction (Wrightwood?)
East Desert: Route 66 Communities CAG
Goffs
Kelso, Gma, Ivanpah
Mountain Pass, Wheaton Springs
Summit Valley (Hesperia)
Edge of Edwards A.F.B
Fort Irwin
Mojave National Preserve
Hollow Hills Wilderness, Grass Valley Wilderness

Planning Commissioner Raymond Allard
Unincorporated 6.2% of pop.

SQUARE MILES UNINCORPORATED UNDER COUNTY JURISDICTION.

of permitted STRS
of Planning Commission Actions 2020, 2021 shown as if in new Districts

Unincorporated Communities
2 Community Action Guides (LAG's) in

2 Regions
Valley San Antonio Heights CAG
Mountain: Mt Baldy CAG - 1 Permit STR /28 AirDNA
Unincorporated area by Fontana
Lytle Creek (or 3rd?)

Planning Commissioner Michael Stoffel
Unincorporated 23.3% of population

SQUARE MILES UNINCORPORATED UNDER COUNTY JURISDICTION.

of permitted STRS plus applications
of Planning Commission Actions 2020, 2021 shown as if in new Districts

Unincorporated Communities
20 Community Action Guides (LAG's) in

4 Regions
Mountain: Angeles Oaks CAG- 92305 - 6 STRs
Barton Flats (HWY 38), Seven Oaks
Mountain Communities CAG
92339 Forest Falls- 11 STRs
Mountain Home Village- 1 STR
Mountain: Oak Glen CAG 92399- 1 STR
Mountain: Bear Valley Communities CAG
Baldwin Lake - 11 STRs
Big Bear City - 878 STRs
Erwin Lake - 68 STRs
Fawnskin/Northshore - 76 STRs
Lake Williams- 3 STRs
Moonridge- approx 200 STRs
Sugarloaf - 327 STRs
Mountain: Hilltop Communities CAG
Arrowhead Lake - 49 STRs
Green Valley Lake- 71 STRs
Running Springs - 99 STRs, Fredaliba
Mountain: Lake Arrowhead Communities CAG
92321 Cedar Glen - 21 STRs
92385 Skyforest - 17 STRs
92352 Lake Arrowhead- 812 STRs
Deer Lodge Park, North Shore
Aqua Fria Arrowhead Villas
92391 Twin Peaks- 66 STRs
92317 Blue Jay- 5 STRs
92326 Crest Park- 14 STRs
92378 Rimforest- 12 STRs
Mountain: Crest Forest Communities CAG
92322 Cedarripes Park- 9 STRs
92325 Crestline- 186 STRs
Lake Gregory, San Moritz, Lake High Park
Valley of Enchantment, Valley of Moon, Skyland
Arrowhead Highlands, Valley View Park
Mountain: Lytle Creek CAG 92358 - 1 STR
Scotland
East Desert: East Desert Communities CAG's
Nipton
Rice
Vidal, Vidal Junction
East Desert: Route 66 Communities CAG
Amboy
Cody, Siberia
Goffs, Ludlow
Saffus, Chubbuck
Bagdad, Essex, Fenner, Homer, Chambleis, Miligan
East Desert: Homestead Valley Communities CAG
Flamingo Heights - 41 STRs
Johnson Valley- 5 STRs
Landers- 74 STRs
Yucca Mesa- 120 STRs
East Desert: Joshua Tree CAG - 792 STR normal/60 in review
East Desert: Morongo Valley CAG - 53 STRs
East Desert: Pioneertown Communities CAG- 78 STRs
Pioneer Town
Rimrock, Pipes Canyon, Gamma Gulch
Burns Canyon, Honda Wash
East Desert: Wonder Valley CAG- 52 STRs
Unincorporated 29 Palms and Desert Heights- 327 STRs
North Desert: Lucerne Valley CAG- 11 STRs
North Desert: Doggett CAG
North Desert: Newberry Springs CAG - 4 STRs
North Desert: Yermo CAG
Colton
Valley: Mentone CAG
Crafton (included?)
River Communities (need CAG)
Big River
Parker Dam
Havasu Lake
Earp
Patton (Highland)
Reche Canyon (Loma Linda)
Silverwood Lake
Cajon Junction (shared with 17)
29 Palms Marine Base
Joshua Tree National Park
Sand to Snow National Monument/Morongo Preserve

Planning Commissioner Thomas Haughey
Unincorporated 2.9% of pop.

SQUARE MILES UNINCORPORATED UNDER COUNTY JURISDICTION.

of permitted STRS
of Planning Commission Actions 2020, 2021 shown as if in new Districts

Unincorporated Communities
0 CAG's in 1 Region

Valley: residual land NO CAG's

Planning Commissioner Kareem Gongora
Unincorporated 17.6% of pop.

SQUARE MILES UNINCORPORATED UNDER COUNTY JURISDICTION.

of permitted STRS
of Planning Commission Actions 2020, 2021 shown as if in new Districts

Unincorporated Communities
3 CAG's in 1 Region

Valley: Bloomington CAG
Valley: Devore CAG
Valley: Muscoy CAG
Glen Helen
Rozema Ranch
Arrowhead Farms
El Rancho Verde
Reche Canyon
Little 3rd

STR - Short-Term Rental, only allowed in Mountain and Deserts. STRS in green

Italics mean it is a new Community added to that Supervisor's District

CAG- Community Action Guide. Some are Communit Plan Areas. Includes communities listed below, and to the right side.

Communities in Blue are not technically listed in the CAG above them, but are in the area. Some are ghost towns.

Communities in Bold Blue are floating/orphans.

**Population of Unincorporated was from Redistricting Charts from County.

From: [Clint Cowen](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: San Bernardino County Short Term Rental Ordinance // COMMENTS
Date: Wednesday, February 2, 2022 11:12:26 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

Personal Note:

I'm a resident of Morongo Valley living in a Single Family home on a 5-acre parcel with a closely adjacent ADU. I have FOUR more acres on my property that I'd really like to utilize some day, and potentially have the *choice* to build & monetize if I so chose, allowing me the financial **freedom** to actually retire some day and afford to eat during that time.

I respectfully implore you to zoom out and consider that these proposed amendments are not a one-size-fits-all solution for our disparate communities.

STR rules for owner-occupied properties should have **VASTLY different** (less-restrictive) rules than remote owners who manage multiple properties.

I would really like to see more time spent on this issue before restricting the livelihoods of so many people who are struggling to survive while recovering from the severe economic impacts of Covid.

I appreciate the work you do and thank you for your time & consideration.

Utmost,

Clint Cowen
10728 San Jacinto St.
Morongo Valley, CA 92256
clint.cowen@gmail.com
323-497-8117

Community Notes which I agree with 100%:

We'd like to stress the following points:

- * DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT
- * San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.
- * There must be different STR and land-use rules or adjustments made for the Desert region versus the Mountain region.
 - * The proposed changes to the ordinance are being driven primarily by complaints from the

mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

- * The vast desert region of SB County is NOT Palm Springs.
- * The vast desert region of SB County is NOT Big Bear.
- * The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.
 - * Parcels are primarily over 1 acre.
 - * We LIVE on the property that we have an STR.
 - * We are thinly populated.
 - * We have plenty of parking on most of our properties.
 - * We are spread out and don't have much traffic congestion.
- * Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.
 - * The county is attempting to shoehorn two very different areas into a single set of STR rules.
 - * If we want to host a wedding or retreat on our own land, that should be up to our discretion, and we should not be penalized financially for it.
 - * There needs to be a carve out for owners who live on the property -- we are 100% different than folks with investment properties who have way less oversight.
 - * If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for larger parcels!

Details:

*** OCCUPANCY ISSUES**

- * I oppose the proposed change in the occupancy calculation.
- * Occupancy should continue to be based on habitable square footage, NOT bedroom count.
 - * Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
- * Homes on large parcels (>1 acre) should be permitted 2 to 4 additional guests than homes on small parcels (<1 acre).

*** LIMITS OF STR PERMIT PER PARCEL**

- * I vehemently oppose the proposed change which would limit STR permits to 1 per parcel.
- * The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
 - * On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
 - * At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

*** MINIMUM STAY**

- * I oppose the proposed change to two night minimum stay.
- * Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
 - * In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
 - * At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

* MAXIMUM PARKING

* I oppose the proposed change to limit maximum parking.

* In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

* 30 MINUTE RESPONSE BY PHONE

* I oppose the proposed change to phone response time.

* Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Clint Cowen

10728 San Jacinto St.

Morongo Valley, CA 92256

clint.cowen@gmail.com

323-497-8117

From: [Matt Kautz](#)
To: [Planning Commission Comments](#)
Subject: San Bernardino County Short Term Rental Ordinance Comments
Date: Wednesday, February 2, 2022 4:23:36 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please find my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

First and foremost, the commission needs to recognize that the desert and mountain areas are drastically different. Most of the changes seem to be driven by complaints from Big Bear and Palm Springs, yet the majority of the county is rural desert. In the thinly populated rural areas, we have large parcels with plenty of parking, not a lot of traffic and lots of space. This requires different rules from the urban areas around parking. In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Oftentimes guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

In addition, occupancy should continue to be based on habitable square footage, not number of bedrooms. Otherwise the outcome is absurd - for example, an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom. That's the whole point of establishing habitable square footage!

I also oppose the rule that guest children must be under 12. Staying at Airbnb's is a great family activity, especially families with teens. Why would you deprive them of that? It's bizarre - you'd prefer for the kids to stay home alone while the parents get away? I don't understand the logic.

Thank you for your consideration,

Matt Kautz

55960 Einstein Lane,
Landers, CA 92285

matt.kautz@gmail.com

818-636-8757

From: [Joy Silverman](#)
To: [Planning Commission Comments; COB - Internet E-Mail](#)
Subject: San Bernardino County Short Term Rental Ordinance
Date: Wednesday, February 2, 2022 11:49:55 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

I am writing, as an owner of a 5 acre property in Joshua Tree, regarding, changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022. Our property is one of the very first airbnb's and short term rentals in the area operating for more than 14 years. When the STR ordinance passed for San Bernardino County we got our cabins permitted immediately. All this time there has never been any complaints from neighbors, we've never allowed parties - mostly, our guests come out to enjoy nature and the quiet, calm of the desert. We have contributed to the economy in many ways including paying high property taxes, hotel taxes, and now 3 permit fees besides contributing to many local businesses.

The changes to the current San Bernardino County Short Term Rental Ordinance will be extremely detrimental to the well being of our family run small business.

I particularly oppose:

1. I oppose limiting STR ownership to 2 STR permits per person. this doesn't take into consideration, people that have more than one structure on large parcels.
2. I oppose the proposed change which would limit STR permits to 1 per parcel. Large (2.5 to 5 acre) parcels with more than one legal structure should continue to be allowed STR permits and should be grandfathered in as a valid non-conforming use.
3. I oppose the proposed change in the occupancy calculation. Occupancy should continue to be based on habitable square footage, NOT bedroom count.
4. I oppose changing permit renewals to yearly from every two years. The cumulative costs become prohibitive.
5. I oppose the proposed change to phone response time. Thirty minutes is an unreasonably short time, as many areas of the Hi Desert have spotty cell reception making this response time very difficult.

thank you for your consideration,

Joy Silverman
63665 Sullivan Rd
Joshua Tree, CA 92252

From: [Dori Newman](#)
To: [Planning Commission Comments](#); [COB - Internet E-Mail](#)
Subject: Short Term Rental Ordinance Comments // San Bernardino County
Date: Wednesday, February 2, 2022 10:23:19 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

As a Morongo Valley resident, we have chosen to live rurally, in community with one another. We don't want our land to be hyper-regulated. We enjoy our privacy. We can handle disputes with our neighbors interpersonally. We don't need the county to come in and legislate us, how we live, and what we can (within reason) do on our own land.

We'd like to stress the following points:

* DESERT AND MOUNTAIN AREAS ARE DRASTICALLY DIFFERENT.

* San Bernardino is the largest County in the contiguous US; it's about the size of West Virginia. Most of the county is rural desert.

* There must be different STR and land-use rules or adjustments made for the Desert region versus the Mountain region.

* The proposed changes to the ordinance are being driven primarily by complaints from the mountain region (Big Bear in particular). These proposed changes to the STR ordinance adopt much of the language of the city of Palm Springs, in Riverside County.

* The vast desert region of SB County is NOT Palm Springs.

* The vast desert region of SB County is NOT Big Bear.

* The vast desert region of SB County doesn't have the STR challenges of an urban, small-parcel town or city.

* Parcels are primarily over 1 acre.

* We LIVE on the property that we have an STR.

* We are thinly populated.

* We have plenty of parking on most of our properties.

* We are spread out and don't have much traffic congestion.

* Rural STR tourists are primarily coming to visit the 7 federal protected wildlife area or 35 wilderness areas.

* The county is attempting to shoehorn two very different areas into a single set of STR rules.

* If we want to host a wedding or retreat on our own land, that should be up to our discretion, and we should not be penalized financially for it.

* There needs to be a carve out for owners who live on the property -- we are 100% different than folks with investment properties who have way less oversight.

* If this is how the county wants to operate -- many of these rules MUST have exceptions and allowances for

larger parcels!

Some Details:

* OCCUPANCY ISSUES

- * I oppose the proposed change in the occupancy calculation.
- * Occupancy should continue to be based on habitable square footage, NOT bedroom count.
- * Otherwise the outcome is absurd, for example an 800 square foot 2 bedroom would be allowed an identical guest count as a 2800 square foot 2 bedroom.
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- * I vehemently oppose the proposed change which would limit STR permits to 1 per parcel.
- * The county should encourage construction of ADUs by allowing them to be an STR in addition to a main house STR.
- * On large (>2 acre) parcels both a home and ADU should continue to be allowed STR permits.
- * At a minimum, existing properties with 2 STR permits for both house and ADU must be grandfathered in as a valid non-conforming use.

* MINIMUM STAY

- * I oppose the proposed change to two night minimum stay.
- * Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip.
- * In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.
- * At a minimum, if any change regarding length of stay was made, single night stays Sunday through Thursday must continue to be allowed.

* MAXIMUM PARKING

- * I oppose the proposed change to limit maximum parking.
- * In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Often times guests are meeting friends or family and they are each coming from different cities. They will each have a car. Parking should be calculated based on the site conditions of the property as it is currently done.

* 30 MINUTE RESPONSE BY PHONE

- * I oppose the proposed change to phone response time.
- * Thirty minutes is an unreasonably short time. For example, this isn't long enough for a typical dentist visit. Moreover, many areas of the Hi Desert have spotty cell reception, so it's common to be outside reachability by cell for at least 30 minutes.

Thank you for your consideration,

Dori Newman
11152 Hess Blvd. Morongo Valley, CA 92256
Dnewmanny@gmail.com
703-400-3674

--

Dori Newman

From: [Debbie Grossberg](#)
To: [Planning Commission Comments](#)
Cc: mtn.folks02@gmail.com; [Sue... Hotz](#); [David Grossberg](#); [Gmail](#)
Subject: Short term rental, Agenda item 4
Date: Wednesday, February 2, 2022 4:14:24 PM

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Dar Commissioners,

Please cap the number of STRs in neighborhoods. Ours has about 12-15 in a neighborhood of 50 or so. It has adversely and dramatically changed our small neighborhood.

The public nuisance of noise, trash and speeding is a threat to the health and safety of homeowners. There are cars parking on and blocking the streets affecting public safety. Our neighborhood would have to hire someone full time to report all the violations.

These permits given should not be a "right".

They disrupt the quality of life for residents who are seeking peaceful living.

Our neighborhoods should be protected and not turned into hotel zones.

Why have residential zoning? Our neighborhood has become a hotel district with investors having a great time at our expense.

Imagine a row of fraternity houses in your quiet neighborhood!

Oh and yes there are wedding events despite being illegal.

It's a constant reoccurring nuisance with no end in sight. And they just keep approving these permits.

Commercializing our neighborhoods does not fit in with residential zoning principles and standards that we have had for so long in our country.

Further Airbnb Corporation is being sold on the stock market and is doing quite well. They have unlimited millions of dollars to use deceptive tactics to further the wealth of their investors.

We have just had property taxes go up. Is this to pay for all the wear and tear visitors create for our local roads and so investors benefit?

We have only you to protect us. Please protect our neighborhoods. Please put a cap on the permits allowed in our neighborhood.

Thank you.

Deborah Grossberg

42408 Bear Loop

Big Bear City, CA

Sent from [Mail](#) for Windows

From: [Tb44](#)
To: [Planning Commission Comments](#)
Cc: [Supervisor Rowe](#)
Subject: Short Term Rentals in Fawnskin
Date: Wednesday, February 2, 2022 1:13:18 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Kandis and I moved to Canyon Road in July 2000 from Beverly Hills. We were trying to get away from all that is Los Angeles. In purchasing we were looking forward to the quiet time we have at the end of the road. We could have bought lakeside, but with the Harley and Jeep groups, and delivery trucks, we chose the end of the road. Kandis, as a Respiratory Therapist, went from Cedars and other large hospitals in LA to the Big Bear Community Healthcare District and has made a positive contribution to the valley.

In 2019 there was one rental house with a sign on it on Canyon Road. Today there are 6 to 8 of them. When there are issues, and we talk to the neighbors involved, the answer we get is “our friends are using the cottage” and it’s just as obvious that they have a lot of different friends who use the cottage on many weekends. We have no way of knowing whether they’re registered with Airbnb or with VRBO, but it has become a problem.

Now, you don't need to hear more complaints about this, because the problems are all common; trash, cars parking in the street and blocking snow plows, parties and noise. With the pressure on our water supply and utilities, it's unexplainable to us that these properties can be used as hotels. We personally think that Cool Cabins and the other management companies are businesses running residential homes as hotels and it should not be allowed.

That said, there are over 150 existing short term rentals today. When someone applies for a permit, the residents in a quarter-mile radius should get a notification and the opportunity to make comments before the permit can be allowed. In Big Bear Lake there is no community whatsoever. Every house in a 2 mile radius of the village is a rental and we do not want to see Fawnskin turn into that.

Kandis and I support what Barbara Finlayson-Pitts, Peter Tennyson and Dave Holden have initiated, and we are encouraged that County Planning and Supervisor Rowe have responded to our concerns and see the need to establish regulations that will work for our town.

Short term rentals should not be run by businesses

in violation of residential zoning. There should be a limit on the rental days in a calendar year. Face to face check-in at the property for each rental. Snow removal and off street parking are essential.

The County as the entity granting the permits must have the necessary enforcement staff to ensure compliance.

We thank you in advance for your consideration of our concerns.

Thomas Brandau, Kandis Krell
1281 Canyon Road Fawnskin CA 92333-0044
213-446-1315 Cell/Text
Tombran44@gmail.com

From: [James Woerth](#)
To: [Planning Commission Comments](#)
Subject: Short term rentals Thursday February 3 meeting
Date: Wednesday, February 2, 2022 9:44:13 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Permits for short-term rental should not be granted for properties not accessible via a county maintained public road. We live on an access road that has a 48% grade hill that becomes treacherous and impassable when ice and snow occurs. No county snow removal is provided. This season STR guests at 1016 Sandalwood Dr have either parked and walked 1/4 mile from Sandalwood Court with small children and elderly falling and getting hurt on ice or attempted to access the STR in 2-wheel drive cars without chains and abandoning vehicles stuck, blocking access to other homeowners' homes and emergency services (Sheriff, Fire, and Ambulance).

The responsible homeowners pay out of pocket for paving; no one is mandated to contribute. STR traffic causes excessive wear and expense to contributing homeowners. Sheriff has no authority to cite speeders, illegally parked cars, or ORV use on shared drives. No STR on shared drives should be given permits!

From: [Chrys Melendez](#)
To: [Planning Commission Comments](#)
Subject: Short Term Rentals
Date: Wednesday, February 2, 2022 6:58:13 PM

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Sent from my iPhone

It is critical to address the problems created by short term rentals in Residential neighborhoods. I live in the county area of Big Bear. The density of STR permits on just my street - Bear Loop has resulted in traffic, noise and trash problems that have been ongoing for years. There are more than 10 STRs on our one street. Each rental brings at least four or more cars which adds 40 to 50 cars to our street when all rentals are full (usually every weekend). The noise from loud music and parties can be heard in my home to the early morning hours. I have two STRs on either side of my home - one played loud music with singing until 4:30am Christmas morning!! Visitors tromp through our properties to play in the snow and take pictures. Cars parked on the streets impede the snow plows.

Please consider setting limits on STR permits that establish density limits in residential neighborhoods. We are no longer able to have the quiet enjoyment of our homes we worked so hard to have

Chrys Melendez
42598 Bear Loop
Big Bear City, CA. 92314
Email - mtn.folks02@gmail.com

From: [Rebecca Corona](#)
To: [Planning Commission Comments](#)
Subject: STR / Alternative Dwellings
Date: Wednesday, February 2, 2022 9:16:51 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

My name is Rebecca Corona. I came to Joshua Tree in September 2019, I bought a home on a 5 acre parcel with the idea of creating an outdoor experience for guests of all walks of life to be able to enjoy. I believed that Joshua Tree should be shared with all, however some locals do not have the same belief. One of the complaints is that housing is now not affordable nor available due to short term rentals. My belief is that you should allow alternate dwellings which help alleviate the stress on housing.

These are a few reasons why I believe I should be able to conduct Joshua Tree Tents. There are five tents three queen size and two twins complete with dorm style refrigerator, microwave, coffee pot, heater/fan USB ports, personal dishes pots and pans beautiful linens and towels. Kept clean and sanitary to the highest standards. Full bathrooms indoors, hot and cold running water porcelain Fixtures. Hammocks and lounges on a 15x50 foot deck with propane fire pit. 16 x 32' above ground pool, pool deck for yoga etc. Outdoor kitchen with two stainless steel barbecues all propane, commercial kitchen sink prep tables and dining area. Offstreet parking, recycle center and a 4 yard dumpster. Low solar lighting to not interfere with stargazing.

I have had 6200 guests visit in 16 months, 1100 five star reviews, never a nuisance report, never an injury, strict 10 PM to 8 AM quiet time. The construction of the property in the tent Compound was to the highest standards. The tents have withstood 60 mile an hour winds with no damage, As well as rain and snow. I live on the property and I'm able to maintain a peaceful experience for the Guests as well as my neighbors.

The amount of money spent by my guests visiting the park, dining out, purchasing gifts, supporting the Arts, entertainment is incalculable. The guests visit numerous towns while staying here in Joshua Tree, That include towns from Palm Springs to Twentynine Palms, Landers and Pioneer Town.

By allowing one night stays it creates more income for local cleaning professionals. \$80,000 was paid out for cleaning services over the 16 month period. Occupancy tax collected by AIRBNB and submitted to San Bernardino county was just over \$40,000.

My place is what many guests are looking for when they visit, the "Joshua Tree experience". I would hope that you would try to reconsider allowing people like me to provide a place for guests to visit this amazing place.

The tent compound takes 2.5 acres of my land (building permits in the process of being uploaded) I also have an indoor unit that is in the process of becoming a ADU, I also have a three bedroom two bath home that I would like to STR as well. I am a single woman, Artist, trying to make my retirement here in the desert enjoyable hosting people from all over the country and the world.

I would ask that you please reconsider some of these rules that you are trying to put in place for the high desert regarding guests visiting and staying in the communities here in San Bernardino county. As I try to make things correct with the county you might consider Allowing people to create these wonderful businesses that benefit so many in our community.

Sincerely,
Rebecca Corona
5323 Shadow Mountain Road
Joshua Tree CA 92252-1890
970-623-9091

rebeccaacorona@gmail.com

Art washes away from the soul the dust of every day life.
~Pablo Picasso~

From: [Dagmar Sabat](#)
To: [COB - Internet E-Mail](#)
Subject: STR legislation rewrite
Date: Wednesday, February 2, 2022 2:53:48 PM

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This is to voice my opinion on the matter of STRs in the Lake Arrowhead area.

It has completely changed the fabric of the community. Locals cannot find a place to rent at a reasonable rate since many investors came here and bought up a lot of the houses with the sheer reason to turn them into STRs. Some people say it brings money into the community. This I dispute. I see cars being unloaded with stuff from Costco and then the whole weekend it is party city and the cars don't move. Some money of course goes back into the community with shopping, restaurants etc however I feel that these STRs are detrimental to the community as most of these investors have ZERO ties or affinity for this community other than using these houses as their personal ATMs...

On my street alone.... 8-10 houses sold within the past year and have been turned into STRs. Now we have to contend with trash strewn all over, issues with parking, belligerent attitude, and loud noise.

There has to be a way to limit the number of permits issued. I suggest a lottery yearly of "X" amount of permits to be issued (definitely less than allegedly are issued now)... I know for a fact some of the STRs on this street are not permitted.

I have lived here full time for over 24 years and the impact on the community has been devastating.

We have to limit the number of permits issued to get a handle back on this.

Dagmar Sabat
PO Box 1649
Lake Arrowhead, CA 92352

From: [Tom Hall](#)
To: [Planning Commission Comments](#)
Subject: STR Mountain Communities
Date: Wednesday, February 2, 2022 7:25:47 PM

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Hello, County of San Bernardino Land Use Services Department,

My name is Thomas Hall; I'm a full-time resident in Lake Arrowhead and I moved here in 2020.

Firstly, I would like to commend you on some of the proposed amendments to Title 8 of the San Bernardino Code (Development Code), limiting occupants based on the home's bedrooms and not on how many bunk beds they can cram into space is an improvement. I would like to see similar limitations to the number of STRs per 1/4 mile, and it should not be OK for full-time residents to be surrounded by STRs on every side (if you need examples, I have them).

Having read the proposed changes, I still feel like the ordinance missed the mark regarding the mountain communities, and there should be a separate code/ordinance just for the mountains. The desert and suburban county communities are vastly different from the mountain; for example, we get snow, have many access roads and private road easements, etc.

We have an STR at the end of our Private Road Easement. As you probably know, many Lake Arrowhead residences have these, and they are essentially the owners' responsibility, an extension of our driveway. The county takes no ownership, obligation, or commitment to maintaining these easements (sometimes called access roads). In addition, due to Boise Cascade's inferior original planning, no property owner on an access road has any obligation to pay for or upkeep any section of these easements.

The problem is that an STR green-lit by the county on our private road easement brings significant traffic, and our road has already deteriorated a lot because of it (I have documentation). It's infuriating that the county allowed/approved this 'business-like' venture to occur without consulting the seven other full-time neighbors who require this easement to be in good shape to use their homes. I'm OK with the county making decisions about roads that they maintain, but it is not OK when the owners of this private road easement are burdened by someone profiting off what is essentially the property of all owners without our consent. An example of a mountain difference was recently we were blocked from accessing our homes for several hours because the STR owner did not plow the road and their ill-prepared STR renters got stuck and blocked the road.

STR permits on private road easements in Arrowhead woods should only be given out if approved by all property owners who rely on the private road easement to access their homes. The STR owner should agree in writing to provide yearly maintenance or an agreement to pay into a maintenance fund or similar.

I'm open to discussing this further and would like to hear the county's thoughts, particularly concerning private road easements in Lake Arrowhead.

Sincerely,

Thomas Hall

911 Teakwood Dr, Lake Arrowhead, 92352
Ph: 8182019736

From: [Richard Walker](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: STR Permitting Proposals - OPPOSED
Date: Wednesday, February 2, 2022 11:56:10 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My name is Richard Walker and I really appreciate your time/energy in reviewing my comments.

My family and I are currently in the process of relocating from San Diego County to the Hi-Desert (Morongo Valley). Our livelihood was/is in the restaurant business and has been for generations (since 1948). Our professional lives were destroyed by a 1-2 punch of COVID-19 and the resulting entitlements employees were given (and continue to demand) as a result of the pandemic. It has made the restaurant industry almost impossible. As a result, we acted quickly and completely. In mid-2019, we began liquidating assets and pouring our life's savings (along with gifts and investments from extended family) into the STR economy in San Bernardino County. We identified the existing STR permits and overall process as being incumbent, stable, and fair. As a result, we have multiple projects that are CURRENTLY in-flight in the County. We understand that changes are coming related to STR permitting. We are a husband and wife team with over \$4M invested and we have no back up plan. Our projects employ either directly or by extension over 100 hard-working people in the area.

We really want to better understand the intention of these changes and/or how they may upend our lives once again. Especially seeing as it is the intention of my wife, newborn daughter (1 month), and I to relocate to SB County to become a more permanent part of this incredible community and the projects we have built here.

- When are proposed changes (assuming a portion of the proposed changes move forward) going to take effect? We are ABSOLUTELY DEAD if our existing projects are unable to be permitted and completed.
- What of existing permitted homes/businesses? My wife is not sleeping (and not just because we have an infant!). She is thinking that they will be taken away. She's far more apocalyptic than I am, however, she discusses this as being akin to taking of Jewish businesses in 1930s Germany. Please tell us that this will not happen.

Specifically related to the proposed changes, there are several items that really jump out at us:

-
- **Minimum 2-night stay.** This will directly affect the livelihoods of our staff and reduce their quality of life. Our crews make ends meet through the 1-night stay (on a given month, it represents 20-30% of all guests). Furthermore, 1-night stays drive the throughput of value-minded guests to our region. We also vastly prefer having our homes occupied, resided in, and used. It keeps blood pumping through the local economy. It keeps our homes safe from ever-increasing opportunistic vandals. Our neighbors have told us that they appreciate the residential activity in areas where once there was none. There is no version of this proposal that helps anyone.
- **STR permit limitations of 2 per household.** This will invite would-be rule breakers from finding ways around this while taking great mom/pop operators and snuffing them out of this business. It will also invite inexperienced operators into the business with their "side hustle" or "vanity" homes being handed over to management companies who notoriously operate poorly. Please reconsider this.
- **Forcing STR permits to be non-transferable.** This is akin to telling someone that's building a business that they will be unable to transfer that business to anyone for the purpose by which it was created. That is, it will drastically reduce the value of these businesses where once we had assumed that this would NEVER happen. We built these businesses to ultimately exit from them one day as far more than just residential real estate. This is one of the many reasons why we have over \$3M worth of insurance at each property. I ask that this be reconsidered.
- **Limiting one STR permit per parcel.** This will pretty much eliminate the building of ADUs in San Bernardino County. Is this what we want? To a certain extent, this may make sense on smaller parcels. Or perhaps in urban areas where long-term high-dollar rental demand exists and can justify the cost building of an ADU. But this makes no sense on large lots in the open desert. We ask that this not apply to lots that are over 2 acres.

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Mobile: 312.371.9667

From: [Ilan Morad](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: STR Planning Commission Meeting Feb 3, 2022
Date: Wednesday, February 2, 2022 7:32:19 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

My name is Ilan Morad and I share a beautiful Cabin in Big Bear with my Twin brother! We recently bought the home this past year and it has been the best investment and getaway place for us and our families. Despite being a STR, we do have a very good relationship with our neighbors that aren't. We are very adamant about keeping that kind of relationship with them.

This home was no cheap purchase for the two of us. The only way we could achieve having this kind of dream was to make it a STR when we weren't up there. We do understand why people in the community would like to limit/restrict properties that are STRs but without my community I believe Big Bear Lake wouldn't truly be the same.

For instance, all my guests receive a guidebook (digitally) once they arrive. I have a list of all my favorite restaurants, coffee houses, dog stores, and experiences on there. My guests, who are especially new to the area, appreciate that so much, they get a chance to experience Big Bear and that chance turns into a great economy for everyone making a living there.

I've also heard about a housing crisis but as a realtor, I am very certain that STR owners are not the reason for creating this crisis.

According to BBL's city councils data, despite the increase in licensed properties, the number of properties occupied by full time residents increased slightly (+54) between 2010 and 2021. Full time residences continue to comprise 22% of the housing stock in the city, as they have historically. Clearly, most newly licensed vacation rental properties have been second homes previously and are now also being offered to vacation rental guests (Page 348).

I understand that there are people who want to restrict us because they see us as a root problem but I don't see any evidence supporting that. As someone who cares about the community I would love to see compromises and solutions. It feels odd that we are both fighting the same fight.

Yours truly,

Ilan Morad

From: [Lynn Watts](#)
To: [COB - Internet E-Mail](#)
Subject: STR Regulations public comment
Date: Wednesday, February 2, 2022 11:31:08 AM

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I am writing in reference to the proposed new regulations for short-term rentals in the unincorporated areas of San Bernardino County.

I have some concerns after reviewing the draft dated 1/27/2022. As a longtime homeowner in Morongo Valley, I can assure you I have no love for the corporations coming in, buying up multiple homes and setting up shop as STR's pushing other longtime residents out of their long-term rental homes.

We are in a housing crisis to be sure, but these regulations are grouping other established local property owners into the same group as corporations.

The only nod towards diminishing the effects that these opportunistic businesses have on our community is that no NEW STR's can be bought by a business. Existing STR's owned by corporations are free to continue business as usual. What does that do to help with the situation we have at hand now, and why would we punish our locals that just wish to do with their own property what they wish?

Most of us can agree, regulations are a necessity, no one wants to live next door to a constant party house. But the overreach as far as, maximum vehicles (As long as they fit on the property what's the problem?), unreasonable maximum occupancy (Have you never had someone sleep on a fold-out couch in your living room?), and limiting ADU's (Granted- NO one wants to see a neighbor moving in a dozen RV's onto their half-acre lot the restrictions need to be reasonable.)

I hope you will consider revising the proposed regulations in order to not negatively impact the residents of our town.

Respectfully,
Lynn Watts



February 2, 2022

Planning Commissioners
Public Comments

February 3, 2022 Meeting

Dear Planning Commissioners,

Unincorporated San Bernardino Together! is a diverse group of people who reside in the unincorporated areas of San Bernardino County with our current area of focus on how Short Term Rentals are affecting our communities. Our group represents full- and part-time residents, as well as STR owners in Lake Arrowhead, Crestline, Running Springs, Big Bear City, Fawnskin, Sugarloaf and Erwin Lake. We are also working with groups in Joshua Tree and Morongo Basin. We are interested in finding workable solutions to address the issues that are adversely affecting these communities.

We begin by saying we have read your proposed redlined STR Ordinance. We see that staff has worked very hard to come up with some solutions to help our communities. The welcomed changes include:

- Only one STR per residential parcel
- No STRs allowed in apartments
- We were especially pleased to see no corporate ownership being allowed, with no transfer of the license upon sale, so that corporate ownership will be reduced by attrition. We are interested to learn how the county will verify that the person acquiring the permit is not a corporation.
- New owners upon any sale of a short-term rental will have to reapply and sincerely hope this will not just be rubber-stamped. The new owner should be vetted as closely as any new applicant would be.



There are a few topics to which we would like to see additional changes:

LTR Incentives:

We would like to add incentives for short-term rental owners to put their license on hold and turn their rental into a long-term rental. This would help alleviate some of the severe housing issues communities are experiencing.

Code Enforcement:

Accountability of Code Enforcement is an enormous area of concern. At this time there are not sufficient Code Enforcement Officers to respond to the location of the complaint. We feel strongly that the TOT collected by the county needs to be used to add significantly more Code Enforcement Officers, especially in the mountain communities. Additionally, the 24 hour complaint line is not adequately attending to the complaints being called in. The caller is frequently told that the operator will forward the complaint however there is no follow up communicated to the caller so the caller has no idea what, if anything, has happened on their complaint. Some callers have even been told the 24 hour complaint line is simply an answering service and that the operator is just reading a script! Callers are frequently told that there is no record of the previous complaints they have made. Code Enforcement needs to be accountable and transparent to the complainants regardless of whether the complaints are called in or filed online. That is the only way we have of knowing whether or not Code Enforcement is really out there. In most of our experiences nothing is ever done to put a stop to the offense and we never see or hear from Code Enforcement. We have had the shared experience that when we call the owners or managers they ignore our calls. This lack of response by the owners/managers has also been a problem for Code Enforcement. We would like to see a penalty or fine written into the ordinance for owners/managers who ignore complaint calls.

Temporary Moratorium on Permits:

In light of the lack of Code Enforcement available for STRs, we are requesting a temporary moratorium on all permits until Code Enforcement can receive adequate resources to successfully provide their services. It is not reasonable to continue adding more STRs, which cause severe strains to neighborhoods, without providing Code Enforcement to mitigate complaints.



We also need a temporary moratorium so that the county can understand the severe impact STRs are having on our communities. It is clear that STRs are starving our communities of workforce employees as well as having huge impacts on long term residents.

It seems evident that a workshop needs to be created by the county so that the county can engage with its constituents to resolve issues that have not been addressed in the redline ordinance revisions.

Limitations on Permits:

We would also like to see long term limitations placed on STRs. This could be through limiting the percentage of homes used for STRs in a particular zip code or by limiting the number of contracts per year or number of rental days per year. The percentage of homes in a given zip code may be problematic for mountain communities since some zip codes cover a small geographical area while others include very large geographical areas. We have found in our outreach that most residents of the mountain communities would prefer a limit to the number of days an STR can be rented in a year. Based on statistics we have reviewed, it would appear that 175 days per year is in line with the current vacancy rates. Additionally, many people in the mountain communities are in favor of limiting the number of contracts per year. Limiting the number of contracts per year may incentivise owners to rent their STRs for longer periods of time (a week or more), which would cut down on the negative effects of constant turnover that most of us experience. It would also provide our communities housing opportunities for temporary work force employees (such as nurses, firefighters, construction workers, infrastructure workers). It cannot be overstated that so many homes have been and are being purchased for the purpose of making them short term rentals. At the same time, our communities are in desperate need of employees - but cannot get/keep these employees because they have no place to live. Short term rentals are eating up our livable housing.



Signage:

We request that the county require appropriate EXTERIOR signage on every STR, easily visible from the street. Said signage should identify the county permit number and valid dates of the permit, property manager or owner contact information (with 24-hour response access), and maximum occupancy of both guests and permitted number of vehicles.

This would promote the following:

- Confirm and verify said STR was legally permitted by the county: County would be assured of its revenue and neighborhood would have assurance county is enforcing permit standards. This would also help prevent any unregistered STRs from successfully operating in unincorporated areas.
- Neighborhood responsibility: Both STR owner/manager and neighbors would have clear lines of expectations and enforcement. Neighborhood would have an added assurance of "action" should anything go awry with STR tenants.
- Unified point of contact: Neighbors would have contact information for owner/manager, and would have 24/7 ability to contact them with any issues. Promotes responsibility for both neighbors and owner/manager of STR and takes the reporting partially off the county CE Officers.

Respectfully,

Unincorporated San Bernardino Together

(Representing full and part-time residents, as well as STR owners in Lake Arrowhead, Crestline, Running Springs, Big Bear City, Fawnskin, Sugarloaf and Erwin Lake)

From: [Francine Merlonghi](#)
To: [Planning Commission Comments](#)
Subject: Airbnb - 1016 Sandalwood Drive, Lake Arrowhead
Date: Wednesday, February 2, 2022 10:10:03 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

My comments below in regards to Airbnb's in Lake Arrowhead, CA:

There is a STR approximately 100 yards away from my house operating without a Permit from Code Enforcement since April 2021. I live on a private easement road, and the home owners are responsible for taking care, paying for upgrades, re-paving, etc.

The following incidents have occurred in our neighborhood in a very short time:

1. Host/Owner does not and never applied for a permit, yes operating this STR illegally! Owner refuses to snow plow so renters can drive up to house in snowy conditions, does not care what his renters due, just cares about the money, is very irresponsible, his renters infringe on our private easement road that he has not paid for. Renters park all over road and this house has a very small lot and no driveway. I have called the Sheriff at SB County Code Enforcement many times, host lies to code enforcement telling them that he does not rent out his house. This house has been rented every day since April 2021. Host/Owner has been caught by code enforcement and fined three (3) times. Still, this house is rented.
2. My safety: I am a permanent resident and home quit a bit, so renters see that, and come and ask for help. I have no idea who these people are and don't want to be hit, killed, attacked verbally. I tell them to contact their host, they do, and host tells them to do yourself. Ie, a renter called and asked if owner would snow plow, owner said no, but you can do it.
3. Peace and quiet, tranquility: people coming to my house asking for directions for the STR, asking for help when easement is icy, snowy because they can't get over the 45 degree angle of a two-sided hill, plus road leading to STR with their 2 wheel drive cars, no idea how to drive in icy-snowy conditions, cars stuck/left in the middle of road, asking for a shovel to dig out a path on the road, partying 24/7 during their stay.
4. Disturbing the piece: Very loud noise, music, people yelling at all hours of the night.
5. Speeding up and down my easement - two very young men. They told us to take a hike, called the host, and host told us to stay out of it. I asked host to make some rules (a requirement of STR), he said hell no. There are six (6) kids that play on road, there are cats and dogs on road. Many times I have stepped aside as the speeding car passes me to the STR.
6. Fire hazards: renters started a fire in a cut down tree trunk in my neighbors yard very late at night in heat of summer. They do not care what happens to someone's property.
7. Garbage hazards: We have bears, coyote's, squirrels, bob cats, raccoons that all get into garbage left all over our properties. Renters have thrown garbage in the culd-a-sak when leaving, all over the driveway, refuse to throw garbage in trash cans. Trash is blown all over our properties.
8. Harassment of home owner's on road: If I do not help these people a complaint is made to the host/owner, I have been told off, parents walking up and down the road with kids do not control their children, a very nasty renter came past my house and demanded that the plumber working on my neighbors house get those god dam hoses out of the

road so he could pass.

9. No long term rentals due to all the STR's located on the mountain

10. Trespassing: renters have no regard for our property. One child kicked fire wood down the mountain, one child running all over my neighbors property hitting trees, climbing on very nice brickwork, cracking bricks, making holes on dirt, knocking down bushes.

11. Zoned for residential, NOT COMMERCIAL

12. Paint for STR's all over Lake Arrowhead is BLACK! This is hideous! The BLACK houses are everywhere severally debilitating the beauty and ambiance of the mountain.

ALL STR'S NEED TO CEASE AND DESIST PERMANENTLY.

Thank you very much for your time in reading this email.

From: [Anna Pearson](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Planning Commission Mtg Feedback for Feb 3, 2022, Project: PMISC-2020-00005
Date: Wednesday, February 2, 2022 11:28:43 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinance which are now being proposed by Code Enforcement and which the Planning Commission will discuss at its meeting on Feb 3rd, 2022.

• **OCCUPANCY**

• **I oppose the proposed change in the occupancy calculation.** Occupancy should continue to be based on habitable square footage, NOT bedroom count.

• **MINIMUM STAY**

• **I oppose the proposed change to two night minimum stay.** Many well behaved visitors can spend only a single night in the Hi Desert as one stop on a longer trip. In addition to shortchanging visitors, housekeepers would see reduced work if single night stays were eliminated.

• **CHILDREN UNDER 12**

• **I oppose the proposed regulation of guest children under 12.** As hosts we don't have any way to control guests booking with children or to verify their minor children's ages. This is an unmanageable rule.

• **MAXIMUM PARKING**

• **I oppose the proposed change to limit maximum parking.** In the rural desert most parcels have room to park many cars. Parking is really not a concern unless you are in a village. For example, saying that 4 guests staying on a 2.5 acre rural property can only have 2 cars doesn't make any sense. Parking should be calculated based on the site conditions of the property as it is currently done.

• **YEARLY RENEWAL OF PERMIT**

• **I oppose the proposed change to make the renewal annual**

• **MUST SHOW PERMIT NUMBER ON HOSTING PLATFORM**

• **I do support this** and I think Airbnb needs to REQUIRE it in order for listings to be up on their site. If the Permit Number isn't put into their system, it shouldn't show up as available to book.

• **CAPS STRS AS 2 PER PERSON**

• **I do support this.** I also think that people who have over 2 should NOT be grandfathered in. Some people/corporations have WAY too many properties.

• **DOESN'T ALLOW STRS UNDER A BUSINESS NAME**

• **I do support this.** People will say that an LLC is required to keep people safe from getting sued, but Airbnb already provides a lot of insurance coverage to hosts to help with this.

Thank you for your consideration,
Anna Pearson
58056 Quail Rd, Yucca Valley, CA 92284
310-775-0218

From: [Spencer Colburn](#)
To: [Planning Commission Comments](#)
Subject: Proposed STR Restrictions
Date: Wednesday, February 2, 2022 8:53:15 PM

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I am writing to express my opposition to the proposed restrictions on short term rentals in SB County. I don't think the restrictions as written would benefit the residents of SB County.

Spencer Colburn
Rancho Cucamonga

From: [Planning Commission Comments](#)
To: tiffkat2000@gmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 9:40:25 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

Tiffany Nicole
12859 frostbrothers ct
Rancho Cucamonga , California 91739
9096483938
tiffkat2000@gmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: Vacation rentals support local community and bring in large amount of tax dollars. Many cities have successful vacation rental programs with appropriate rules in place. For instance, making sure the listings display permit numbers, capping occupancy, capping parking and increased monitoring of rentals. I am all for appropriate rules and happy to remit taxes to the county. These taxes and go to help improve the communities for all as well as possibly fund affordable local housing. Maybe a compromise is take all the STR revenue and use it to build housing for locals that is more affordable? It is unlawful to tell people what they can do with their homes and it truly impedes on their fundamental rights. Please consider this while reviewing this topic. Thank you.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Kristopher Cowen](#)
To: [Planning Commission Comments](#)
Subject: Feb 3rd agenda regarding item 4
Date: Wednesday, February 2, 2022 9:05:21 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To whom it may concern,

Imposing STR regulations in county areas will have significant negative repercussions. Home values, tax revenues and overall quality of life will be negatively impacted.

The tourism industry in joshua tree, lake arrowhead and other county destination locations is the lifeblood of our areas. Imposing regulations will further exacerbate the housing and lodging crisis in these more remote locations.

Please consider all the facts and vote to keep our industry alive with no overbearing STR regulations.

Thank you for your consideration.
Kristopher Cowen

From: [Planning Commission Comments](#)
To: bbjgm@hotmail.com
Cc: [Planning Commission Comments](#)
Subject: Public Comments for Planning Commission meeting
Date: Wednesday, February 2, 2022 10:55:59 PM

Thank you for submitting the request.

Here is a copy of the information you submitted.

Contact Information

James M
40115 north shore drive
fawnskin, California 92333
909 380 3976
bbjgm@hotmail.com

Request Information

Request: Public Comment for a Specific Agenda Item

Agenda Item: 4

Comments: STRs detract from neighborhoods. STRs displace locals. Please do not issue more STR permits. Many hosts on Airbnb forums refer to issues "running their businesses". Neighborhoods aren't for "business". Enforce zoning. Limit # nights per year STRs can rent to discourage making a "business" in a neighborhood. Enact "no noise at property line and 10pm no spa use rules" like Big Bear Lake. Consider an annual per parcel lottery on a limited number of STR permits. Each year you may or may not get a permit. Raise STRs taxes and use the money to subsidize homeowner's offering LTRs or other housing initiatives. We moved from Big Bear Lake because it felt like a giant hotel. Don't let Fawnskin fall to the same fate.

Thank You.

Planning Commission Secretary
385 N. Arrowhead Avenue
San Bernardino, CA 92415
(909) 387-8311

System Admin

Note: This email is being sent from an unmonitored mailbox. Please do not reply.

From: [Bernadette Bermudez](#)
To: [Planning Commission Comments](#)
Subject: Feb 3rd Agenda Item 4
Date: Wednesday, February 2, 2022 10:08:11 PM

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To whom it may concern,

I believe that the limitation of short term rentals will pose a negative impact on the economy and society.

Short term rentals promote tourism and travel while maintaining a level of accessibility and flexibility that a more general population can benefit from. For example, one of the results of a global pandemic is the ability to work remotely, and people are now able work from any location as long as they have WiFi. Short term rentals pave the way for people to work and have a vacation. This promotes a happier lifestyle, and happier lifestyles usually stimulate the economy. This new generation is intrigued by the nomadic life and short term rentals give people the freedom to explore different areas without having to spend too much and worry about their lodging.

Short term rentals provide an alternative to big chain hotels and confining apartment complexes. Their increasing popularity inspires innovation and creativity. There are even shows on TV that feature the amazing things people have done to make their short term rental one of kind. Most of the time, short term rentals are properties that were flipped, meaning these aren't brand new properties being built for the purpose of being primary residences. The increasing popularity of short term rentals doesn't derail the demand for primary housing.

More people are interested in purchasing properties as short term rentals to supplement their own income. Again, this is beneficial to the individual and the economy. The constant flow of money in these transactions increases the value of the area, meaning more money can go back into the community for the different projects that need funding.

All in all, I think short term rentals are good for the economy and society. They shouldn't place limits on them. Thank you for your time.

From: [Seth Anapolsky](#)
To: [Biggs, Lupe](#); [Planning Commission Comments](#)
Subject: FEB 3rd agenda regarding item #4 STR
Date: Wednesday, February 2, 2022 9:50:21 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello and thank you for your time and reading my concerns.

I am for regulation and strict fines for those practicing without a permit but I am not for many of these regulations. Here are some comments and questions that I hope the board members will all consider:

1. As a homeowner in Joshua tree and a previous owner in Big Bear, we are always supporting the local businesses and communities by employing handymen and local tradesman for repairs, landscapers, housecleaners, septic, etc.
2. We also feature local businesses products (food, soaps, coffees, etc) in our properties. We includes where to purchase them as well –
 - Have you asked local businesses how they feel about these ordinances?
 - Are we considering all the jobs of these aforementioned workers who will be impacted by limiting STRs in the county?
3. What is the plan to enforce the illegal operators? Wouldn't doing everything in the county's power to shut down and heavily fine the illegal operators alleviate all the concerns of the against crowd (since illegal operators are more than double as those with permits)?
4. Vacation area or not, there is a housing shortage. Restricting STRs will not solve the housing problem. We need more houses available for people to purchase. Can the county help with more affordable housing? Or incentivize builders to build projects in the area?
5. As a property owner, is it right to enforce a form of rental control by restricting how I rent out my property?
6. I'm 100% against my ability to add an ADU and not be able to rent out both main house and ADU. They are included in the total square footage for county tax records and are under the same parcel.
7. I do feel corporations and "big businesses" should be restricted on how many can be owned.

Ultimately, I am in favor of rules to help the communities become better. Vacation rentals bring so much money to the local areas which can be allocated to help with trash, roads, community development, building up a fund for housing shortages, etc.

I hope the board sees that keeping STRs as allies of the county will help to generate far more positives than negatives.

WARNING! WIRE FRAUD ADVISORY: Wire fraud and email hacking/phishing attacks are on the increase! If you have a closing transaction with us and you receive an email containing Wire Transfer Instructions, **DO NOT RESPOND TO THE EMAIL!** Instead, call FCHL loan officer/closer immediately, using previously known contact information and **NOT** information provided in the email, to verify the information prior to sending funds.

From: [Summer Luszeck](#)
To: [Planning Commission Comments](#)
Subject: February 3rd, Agenda Item #4, STR Regulations
Date: Wednesday, February 2, 2022 9:24:29 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

I am emailing in regards to the proposed changes to the STR permitting and allowance. While I fully support, and agree that some portions of the STR area may need to be regulated, I disagree with the proposed changes. Limiting the number of STR properties one can own will only limit the revenue brought into the county, especially in areas such as Joshua Tree where the local community and shops have such a huge growth in income and success themselves. The STR properties not only bring in taxes and revenue, they bring new life to a formerly deserted area, rejuvenating the community and jobs. For these, and many other reasons, I must express my concern and disagreement for the proposed changes.

Thank you for your time,
Summer Luszeck
(909)272-9629

From: [Martin Poschenrieder](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#); hello@joshuatreevra.com
Subject: Short Term Rental Ordinance Comments
Date: Wednesday, February 2, 2022 10:31:58 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear San Bernardino County Planning Commissioners and Board of Supervisors,

Please accept my comments below regarding the changes to the current San Bernardino County Short Term Rental Ordinances which are now being proposed by Code Enforcement, and by which the Planning Commission will discuss during their meeting on February 3, 2022.

1) Adopt changes to fit the desert region

The desert and mountain areas are drastically different. The proposed changes to the STR ordinance adopt much of the language of Palm Springs and Riverside county. The vast region of SB County is not Palm Springs or Big Bear but mostly rural desert. As such, the desert region does not face the challenges of an urban, small parcel town or city. In the desert region the parcels are primarily over 1 acre, we are thinly populated and have minimal traffic congestion. The proposed changes fail to address these differences by enforcing one set of rules for two drastically different areas. There should be allowances and exemptions for larger parcels.

2) Occupancy calculation

I am opposed to the occupancy calculation and feel this should be based on habitable space and not bedroom count. Homes on larger parcels (over 1 acre) should be permitted 2-4 additional guests than homes on small parcels.

3) Parcels larger than 1 Acre should be allowed to have 2 permits

I oppose the change that would limit STR permits to 1 per parcel. The county should encourage construction of ADU's by allowing them to be an STR in addition to a main house STR.

4) Alternative Shelters provide visitors a unique experience

Alternative shelters, such as RV's should be eligible for an STR permit. Eliminating alternative structures as short term rentals would vastly impact the "Joshua Tree experience" for visitors that purposely seek out and stay in alternative structures to experience the stargazing, beautiful desert that Joshua Tree is world famous for.

5) Yearly renewal of permits

I oppose the yearly renewal of permits. This change and fees will place a

burdensome expense for owners who are of limited income.

Thank you for your consideration,

Martin Poschenrieder
0 La Brisa Road
Flamingo Heights, CA 92284
818-653-2581

From: [Tiff Gmail](#)
To: [Planning Commission Comments](#)
Subject: Short term rentals
Date: Wednesday, February 2, 2022 8:38:05 PM

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I own a STR in Joshua tree. I support tons of local companies from the coffee shops by buying their coffee and putting in my home for guests to recommending local hiking guides. Without these homes, the economy in this area would suffer and small businesses would have a significant impact.

I love sharing my home with guests to show them what I love about this amazing place. I love supporting local. Significant STR implications would affect the local economy more than you could understand. You should speak to cities like laguna beach and Dana Point who are actively trying to eliminate their ban on STRs because the economic impact was more significant than they could have ever imagined! Millions lost in tax revenue.

Please consider this before going forward with any sort of regulations!

Thank you-

Tiffany Katuls

From: [Janeva Adena Zentz](#)
To: [Planning Commission Comments](#)
Subject: STR Ordinance Changes
Date: Wednesday, February 2, 2022 10:04:47 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To the County of San Bernardino Land Use Services Department,

I am a full-time resident and homeowner in Lake Arrowhead. It is my only home and I moved in mid-2020 before the housing prices skyrocketed. Since moving into the area, I have witnessed STRs take over the neighborhood, harming wildlife with poor trash handling, disrupting the quiet of the forest with loud parties, and damaging private property.

There are two regulations I am encouraging the County of San Bernardino to adopt. First, limit the density of STRs per quarter mile, ensuring no full-time resident becomes surrounded by transient renters. In the mountains of Lake Arrowhead, we need our neighbors. With inclement weather, wildlife, high fire hazards, and rugged terrain, residents rely on one another more than in a city environment, and by maintaining a healthy ratio of residents to STRs the County can foster rather than damage the community.

Second, I strongly encourage you to deny any permit for an STR located on an access road, also referred to as a private easement. This regulation is imperative. My home is located on a privately owned road or "access road". We have one STR located at the end of the access road and due to the increase in traffic (from 3-4 additional cars/day plus cleaning crew and other maintenance vehicles) the access road has degraded significantly in one year. We now have potholes and torn asphalt that wasn't there before, because of this one new STR.

Recently STR transients slid down the access road in their car, backed into our retaining wall, and then blocked the access road for more than 2 hours for all the residents that live on the road. I watched nervously as 3 men pushed on a car in the snow while someone accelerated the car unable to control the vehicle. Technically, since all the homeowners own a portion of the access road, and these transients were on my property line, I would be liable if they got hurt. This is just one example of how the County's decision to permit an STR on our access road is detrimental.

I immediately called the County to report this dangerous incident, and I was told that I was responsible for plowing the access road. I know how to use a snow shovel, own a mountain-appropriate car with rugged tires, and do not need the access road to be plowed to get in and out of our driveway. Why am I supposed to pay for plowing of a road to help line the pockets of a greedy STR owner and the County, when I don't even need that service?

In short, the County is abusing its power by essentially forcing property owners to maintain roads for STRs. When I bought my home, I never signed on to subsidizing an STR that makes several thousand dollars every week, and just as important, the

County is placing me in legal jeopardy *(\$ 845 below).

If there are investors who would like to make money in Lake Arrowhead, there are plenty of ways to do so beyond STRs. The area is in *desperate* need of reliable eateries, shops for tourists and locals, and youth-focused activities. The County could be proactive in supporting new investment rather than passively taking a cut from Short Term Rentals.

I and my neighbors request that you eliminate the financial burdens and unanticipated liability effects that you have placed upon rural, unincorporated communities by allowing STRs on access roads.

Sincerely,
Janeva A. Zentz-Hall

*** Civil Code § 845.**

Legal Issues: Private right-of-way stipulations are defined by California Civil Code § 845. In short, property owners are required to provide right-of-way easements through our private roads for STR customers, employees, refuse collection, and contractors. By statute, property owners are also required to maintain those same roads: 'The owner of any easement in the nature of a private right-of-way, or of any land to which any such easement is attached, shall maintain it in repair [CIV § 845(a)].

Regarding legal responsibilities, CIV §846 warns that this provision 'does not limit the liability which otherwise exists (a) for willful or malicious failure to guard or warn against a dangerous condition, use, structure or activity...'

And finally, regarding right-of-way mitigation, if property owners feel that a right-of-way privilege is being misused and the road damaged by the passage of STR associated vehicles, work and delivery trucks, heavy equipment, and STR employees - underlying property owners can initiate legal remedies, however, any such actions will come at their own expense.

Litigious Issues: In essence, the current STR code has placed(1) the real property and assets of contiguous property owners at risk. And, (2) the current code requires contiguous property owners to subsidize commercial enterprise (STRs) by (a) providing right-of-way of way, and (b) by maintaining those same rights-of-ways for the sole benefit of commercial STRs.

From: [Tom Hall](#)
To: [Planning Commission Comments](#)
Subject: STR Ordinance
Date: Wednesday, February 2, 2022 8:53:10 PM
Attachments: [page76image3119332864.png](#)
[page76image3119333280.png](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Sir/Madam,

I share many of the same views as Gary Stiler from Morongo Valley.

We live in Lake Arrowhead on a *Private Road Easement*, there are 8 residents on the P.R.E in total with one owner at the end who runs a full-time STR. Like Mr. Stiler we are very concerned about the liability that the county has burdened all of us with by allowing an STR to operate on a private road easement that is owned by all residents with equal responsibility, none of us were consulted and none of us approve of it.

The county refuses to maintain any part of the road despite taking tax dollars for renting this STR.

The ordinance needs to address Private Road Easements separately.

Thank you,
Tom Hall

Note: for further reference following text describes liability issues as described in California

76 of 83

Civil Code § 845.

Legal Issues: Private right-of-way stipulations are defined by California Civil Code § 845. In short, property owners are required to provide right-of-way easements through our private roads for STR customers, employees, refuse collection and contractors. By statute, property owners are also required to maintain those same roads: *'The owner of any easement in the nature of a private right-of-way, or of any land to which any such easement is attached, shall maintain it in repair [CIV § 845(a)].*

Regarding legal responsibilities, CIV §846 warns that this provision *'does not limit the liability which otherwise exists (a) for willful or malicious failure to guard or warn against a dangerous condition, use, structure or activity...'*

And finally, regarding right-of-way mitigation, if property owners feel that a right-of-way privilege is being misused and the road damaged by the passage of STR associated vehicles, work and delivery trucks, heavy equipment, and STR employees - underlying property owners

can initiate legal remedies, *however any such actions will come at their own expense.*

Litigious Issues: In essence, the current STR code has placed (1) the real property and assets of contiguous property owners at risk.

And, (2) the current code requires contiguous property owners to subsidize commercial enterprise (STRs) by (a) providing right-of-way of way, and (b) by maintaining those same rights-of-ways for the sole benefit of commercial STRs.

Recommendation: SBC Planning Commissioners Supervisors should act to examine and address salient legal issues related to STR use of contiguous private roads (i.e.: maintenance issues/costs to my neighbors).

From: [Lydia Neeley](#)
To: [Planning Commission Comments](#); [Supervisor Rowe](#)
Subject: STR regulations
Date: Wednesday, February 2, 2022 11:23:48 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To whom it may concern,
I am vehemently opposed to many of the proposed changes to STR rules in San Bernardino County.

The most egregious of them is the two night minimum. This has the potential to greatly damage the revenue that both STR owners earn as well as the revenue they bring to the local businesses. There are many legitimate reasons for vacationers to come up for just one night, especially during the week. Both work schedules and financial limitations might make one night rentals more appealing to some and we should not use these factors as grounds for discrimination. If it is parties that this proposal is trying to keep out, then I urge the county to go after houses that do this with fines, which have recently been raised by an order of magnitude to temper this behavior.

The parking should be based on how many spots can be provided by the property and nothing else. By all means give tickets to those who park where they aren't supposed to, but why not allow as many cars as can reasonably park? People may need to meet at the STR if they are coming from different places and there is nothing immoral about that.

STR permits should absolutely be transferable to a new owner. The basis of these permits is the safety and habitability of the houses, not whose name is on the deed. This is a thinly veiled first step to establishing caps.

The proposed occupancy limits will negatively and unfairly affect many cabin owners and should not pass.

I urge the county not to adopt these unfair and unnecessary restrictions.

Thank you,
-Lydia Neeley

From: [Amber Bryk](#)
To: [Planning Commission Comments](#)
Subject: STR
Date: Wednesday, February 2, 2022 9:36:48 PM
Attachments: [Video 2.MOV](#)

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The home behind us was converted to a STR late last year, even though they were illegally renting it out for months before. It has been nothing but people partying, screeching and playing music so loud until the early am hours (1-3am) even on weekdays. I even had to put HVAC because we couldn't keep our windows open in the summertime due to the noise. I took video the 5 times I could haul myself out of bed even though it has happened at least 20+ times. I let the property manager listed our letter know multiple times (with video evidence) and she just stopped responding to me so I started calling code enforcement. I have called the sheriff at code enforcement's recommendation (even though I think this is an absolutely waste of taxpayers money) and had zero results as of today. I own two rental properties (long term, would NEVER str them) and understand the value of investment properties but this is taking away the reason I moved to my beautiful quite neighborhood. I was a visitor before moving here and now I'm considering moving because my home has become a nightmare. If anyone could help I would appreciate it, I'm all for visitors enjoying our beautiful mountain but I feel like a hostage in my own home.

I can provide you with all the email and video documentation I've had with the property owner. Fines are only a small solution since many of the people that rent STR behind us are not second time renters.

This is my last correspondence with the STR owner. I complained about them keeping music on until 1:30 AM and sent a video for proof and then the guests left every single light on in the backyard after they are contacted.

Property owner;

“Hi there I am so sorry we have no one there but the people who checked out today must have left that light on. We also have a sign that says to please make sure this light is turned off before checking out and after a certain time we are working on sending our property manager over to get that shut off”

“I thought you were the property manager? Maybe you should give me your local contact so something can actually get done when I complain. It does it absolutely no good if I text you and nothing happens until the next day if I get any response at all. I am a real estate agent, own two multimillion construction & shopping centers and own several residential rental properties (although my rentals are long term as I would never subject anyone to an STR) and I find the lack of rules and supervision severely lacking at this property. I have not been able to enjoy almost a single week in a month because of the noise and disrupt that your guests have caused me. Please have your agent that checks in your guests know that they need to follow the rules that they have agreed to the rules or I will have to take further steps, unfortunately I'm at the

point where I'm considering contacting my attorney.”

Videos of noise and light disturbances attached



Sincerely, Amber Rice
Big Bear City, CA
Amberbryk@aol.com

From: [Alison V](#)
To: [Planning Commission Comments](#)
Subject: Big Bear Lake short term rentals
Date: Thursday, February 3, 2022 7:11:15 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear planning commission,

My family has owned a cabin on Conklin Drive since the 1970s. For the first several decades we've watched the town evolve and while there were some rentals, the neighborhoods stayed intact. Now when we go to our cabin, there are parties up and down the street with packed short term rentals, cars parked haphazardly; we no longer have neighbors, just corporate managers.

Please limit the number of short term rentals. Our city, down the hill allows short term rentals by the beach and 30 day minimum rentals for the rest of the city, in order to preserve neighborhoods. I request you do the same, around the ski resorts and downtown, and return our neighborhoods back into neighborhoods. This would also help with the critical housing shortage for people that want to live in BB full-time but don't have available rentals because everything's an STR

--

Alison Vredenburgh, Ph.D., CPE
Vredenburgh & Associates, Inc.
2588 El Camino Real, Ste. F353
Carlsbad, CA 92008
(442) 222-8289

From: [Theodore Trentman](#)
To: [Planning Commission Comments](#)
Subject: Proposed fine for False Reports.
Date: Thursday, February 3, 2022 6:49:26 AM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My name is Theodore Trentman. I am a home owner in Big Bear City who use to live full-time in Big Bear but because of work related issues, I had to move full-time to Whittier, CA. I self-manage my home as a vacation rental in Big Bear City.

Since this movement of hate against people who choose to rent out their homes short-term instead of long-term has started, I've received three false reports on activity at my home. One report made against my home was someone having a party. Luckily, I was at my Big Bear home by myself the night enforcement showed up investigating the situation. To my surprise and theirs, I was not having a party. I heard the party but the party noise was coming from home owners who were allowing their high school girls to congregate during Covid-19's lock down. It was happening every Friday night. The officer apologized. Thank God I was there to meet the enforcement officers.

Then again, I received a call about barking dogs. This time, the enforcement officers showed up at my home. Again I was staying the night. The officer told me a report came in that I had dogs running around my yard barking late at night and that my neighbor was attempting to sleep. This neighbor also called me and left a message for me to shut my dogs up. I told the enforcement officer that he could gladly come onto my property but that my dog's were back in Whittier. Moments later, the enforcement officer was knocking on the door of a long-term renter who was the other neighbor to the lady who I know made the complaint. The enforcers found a long-term renter who had 9 dogs in her possession. Last month she was evicted. In her possession, 18 dogs. We was illegally breeding.

All three complaints were bogus.

In the City of Big Bear Lake, there is a \$500 fine for false reports made to Code Enforcement. I would like our County to consider adding this penalty to County residents who make false reports. Please help stop harassment from long-term renters and home owners who are making false reports in efforts to over exaggerate the negative impact of short-term renters. If you would like my address, please reach out to me. I'd prefer not to make my address public to avoid more false reports.

Thank you,
Theodore Trentman
213-948-3165

From: [Alan Lee](#)
To: [Planning Commission Comments](#)
Subject: Public Comment
Date: Thursday, February 3, 2022 7:29:46 AM
Attachments: [image053054.png](#)
[image151095.png](#)
[image846183.png](#)
[image139086.png](#)

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Dear Members of the Planning Commission of San Bernardino County,

I write you in my individual capacity as an elected member of the City of Big Bear Lake City Council. I join with the organization *Unincorporated San Bernardino Together* in urging the Commission to adopt and recommend to the Board of Supervisors appropriate and meaningful changes in the County's Short Term Rental laws. The argument that the free market will fix itself, is a good political soundbite but is without substance, in terms of good governance. My office regularly receives complaints about the over saturation of vacation rentals in the unincorporated areas of our Big Bear Lake community. While fines, adoption of behavior standards, greater enforcement, signage and other appropriate regulation is needed, it will all be for not, if you do not impose a moratorium or adopt reasonable caps on the number of STR's allowed in a community. In just about 4 years, Big Bear Lake has seen a 73% increase in the number of vacation rentals. I suspect our surrounding communities in the incorporated areas have seen a similar increase. When factoring in the unlicensed STR's the numbers are actually higher.

The situation is so bad in Big Bear Lake, the residents are now collecting signatures for a voter initiative that will likely pass, despite the deep pockets of the vacation rental industry. I urge the Commission in the strongest possible terms to take appropriate corrective action to fix this every growing problem. Please do not tinker around the edges with feel good changes, it is imperative that the Commission make substantive changes, including limiting the number of STR's

Respectfully,

Alan

Alan Lee

Councilmember, Big Bear Lake



39707 Big Bear Blvd., PO Box 10000 Big Bear Lake, CA 92315

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Big Bear Lake City Hall is open Monday - Friday, from 8:00 a.m. - 5:00 p.m.

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From: [Martin Crawford](#)
To: [Planning Commission Comments](#)
Subject: STR Ordinance proposals
Date: Thursday, February 3, 2022 7:46:50 AM

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Planning Commission,

I have always appreciated how the county has empowered property owners to grow the local economy by renting out their vacation cabins in the beautiful San Bernardino mountains. As a former resident in Arrowbear and now a cabin STR owner in Green Valley Lake, I can assure you that the amount of money brought to these communities is quite substantial because of the ability to rent second homes for visitors. Any new regulations that make this process more difficult will negatively impact the local economy.

Here's a non-comprehensive list of the ways I've seen STRs contribute to the local economy:

Local house cleaners, plumbers, electricians, firewood providers, lake staff, ski resort jobs, restaurants, handyman repairs, weed abatement jobs, grocery store employees, farmers market stand owners, contractors, code enforcement officers, rover .com sitters, contractors for renovations, interior designers, spa maintenance employees, etc.

I'd like to urge you to not adopt the following changes in the proposal:

2 night minimums. 2 night minimums are fine for the weekends. However, it is useful to have a one-night minimum on the slowest months of the year for midweek. This allows for more visitors to visit the SB mountains and helps keep the local stores and restaurants open in midweek; they can't thrive on weekend traffic only.

Owner transfers. The ease of transferring one existing permit to the new homeowner helps would-be buyers look for current STR permitted homes rather than considering purchasing a home that may have previously had long term renters. This helps streamline the problem and not add to the nationwide housing issues including the lack of long term rentals.

Occupancy proposals. First, the suggestion to not allow additional guests to use a sleeper sofa in the living room will severely discriminate larger families from visiting. In 2022 we should be thinking more about how to be inclusive as opposed to making a simple trip to the mountains exclusive to smaller families who can afford to pay higher nightly prices. Larger families typically have more mouths to feed and it is nice to be able to find an affordable solution for them if they don't mind have a couple family members use the sleeper sofa. In addition to the living room occupancy, I understand there is a proposal to make a max of 2 people per room regardless of square footage. We have a 2 bedroom vacation cabin that has a double bunk (2 on bottom and 2 on top). Given the fact that owners of permitted STRs must follow all the same ordinances as their guests, this new law would make my family and many others not be able to use their OWN property. This gets into a dangerously gray area with constitutionality of government control of personal property. Please reconsider these proposals.

Max of 4 daytime guests. Again, this proposed change would make it quite difficult for my family to use our OWN cabin. We often have other families join us and rent the STR down the street but we will gather at one place until the quite hours and enjoy each other's company. This rule would again create a very narrow definition of how families and friends can go on a simple trip to the mountains.

Rental agreements. It is proposed to have electronic or hand signed rental agreements signed from each guest that outlines penalties and regulations. This would be redundant and unnecessary since the penalties and regulations can easily be outlined in the Airbnb or VRBO listing and house rules. Please allow STR owners to simply list the penalties in the existing listings as opposed to re-inventing

the wheel.

Lastly, please reconsider the existing rule that all STR permit holders have to follow all the exact same rules as their guests. Our full time resident neighbors are allowed to park along the side of the street (off pavement), have huge parties of friends over (more than the 4 person day visitor rule), don't care about quiet hours, and often have unsafe conditions in their homes that would no doubt violate a STR code. We have to hire the pull-out service from Burtec for our garbage and go out of our way to make sure trash is contained properly. However, our neighbors have unsecured cans that the raccoons and bears get into all the time. Each time I've called the county about these issues I've been told that they do not need to follow the same rules as STR owners. This is unacceptable. Either all residents abide by the same issues that affect the community or allow the STR owners to use their own property how they wish when using it for personal use, within the law of course. We did not buy a remote mountain cabin to hear 6 years later that the entire county was turning into a giant HOA, forcing upon rules that should not apply to them when using the home themselves. Please reconsider this section of the ordinance and stop forcing personal homeowners to follow rules that do not apply to them.

Thank you for your time. Much appreciated.