



Marin County Planning Commission
Draft Regulations on Short Term Rentals

October 20, 2023

Inverness Association response to the County of Marin's Draft Short-Term Rental Standards

The Inverness Association supports the Draft's restriction to limit short-term rentals to one unit per property. This restriction is consistent with the results from the survey the IA conducted, where the majority of respondents were in favor of limiting STRs to no more than one unit per property owner.

The IA also supports the Draft's restriction preventing the licensing of STRs in accessory dwelling units (ADUs) and junior dwelling units (JDUs), as these housing units are intended to increase housing in unincorporated Marin. However, the Draft needs to specify whether all second units, outbuildings, cottages etc. that meet the specifications of ADUs* and JDUs** will be restricted from having STRs. The Standards should make clear the criteria by which the county will issue or deny licenses based on the ADU/ JDU restriction.

The IA does not agree with the Draft's distinction between hosted and unhosted STRs. Caps on STRs should pertain to both unhosted and hosted STRs so as not to unintentionally increase the number of STRs in the Inverness Community beyond current levels. A modification to the meaning of a hosted unit, where the host and STR are both within the same unit, for example the STR is a basement or a bedroom in the host's house, could merit a distinction between hosted and unhosted rentals. Furthermore, a hosted unit should exclude units where the primary resident vacates the property for the purposes of renting their unit, instead a host should be required to be onsite during the period of a rental.

The IA supports measures the Draft takes to consider parking, garbage and other impacts STRs have on the community.

Thank you for your consideration,

A handwritten signature in black ink that reads "William Barrett". The signature is written in a cursive style with a long horizontal stroke at the end.

William Barrett, *president*
Inverness Association Board of Directors

*An ADU is accessory to a primary residence and has complete independent living facilities for one or more persons and has a few variations:

- Detached: The unit is separated from the primary structure.
- Attached: The unit is attached to the primary structure.
- Converted Existing Space: Space (e.g., master bedroom, attached garage, storage area, or similar use, or an accessory structure) on the lot of the primary residence that is converted into an independent living unit.

**JADU: A specific type of conversion of existing space that is contained entirely within an existing or proposed single-family residence.

(Source: <https://www.hcd.ca.gov/sites/default/files/2022-07/ADUHandbookUpdate.pdf>)