October 6, 2026

Mayor Randy Rowse
Councilmember Eric Friedman
Councilmember Wendy Santamaria
Councilmember Oscar Gutierrez
Councilmember Meagan Harmon
Councilmember Mike Jordan
Councilmember Kristen Sneddon
PO Box 1990
Santa Barbara, CA 93102

RE: Short-Term Rental Ordinances

Dear Mayor Rowse and Councilmembers,

The Santa Barbara Association of REALTORS® (SBAOR) represents more than 1,200 REALTORS® across the South Coast who live and work in the communities they serve. Our members help families and businesses navigate housing and real estate decisions, and we work closely with local governments and community partners to advance practical, community-focused housing solutions. We share the City's goal of ensuring Santa Barbara remains a place where people can live, work, and thrive.

SBAOR supports the City's efforts to establish a clear and enforceable regulatory framework for short-term rentals (STRs) and homeshares. We support reasonable regulations that protect neighborhoods, establish accountability, and provide clear rules for property owners and enforcement staff. However, several provisions in the proposed ordinances go beyond regulating neighborhood impacts and raise questions about whether the restrictions will achieve the City's stated housing objectives.

Before adoption, SBAOR respectfully requests that the City:

- Allow an owner-occupied duplex to obtain a Homeshare license for the owner's primary residence and an STR license for the second unit when both are otherwise eligible.
- Reconsider the one-license-per-person or affiliated entity restriction and identify the specific housing or neighborhood impact it is intended to address.
- Ensure legitimate family, trust, estate-planning, and liability-protection ownership structures are not unintentionally prohibited.
- Provide appropriate due process for license decisions and verified violations, including an administrative appeal process and a clear distinction between a complaint and a substantiated violation.
- Establish measurable housing outcomes and report back to Council on whether the program is actually increasing long-term housing availability.

Measure the Housing Outcome

The City has consistently identified housing preservation as a primary reason for these regulations. SBAOR shares the goal of increasing housing opportunities, but eliminating an STR does not necessarily result in a new long-term rental. STR properties may include primary residences rented periodically, second homes, inherited family properties, or future retirement residences. If STR use is prohibited, some of these properties may simply remain second homes or otherwise remain unavailable to long-term renters. The relevant question is therefore not simply

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how many STRs will be eliminated, but how many properties are reasonably expected to become available for long-term occupancy as a result.

Before imposing broad restrictions, the City should identify the housing outcome it expects and establish a way to measure whether that outcome occurs. If the City is willing to forgo substantial recurring Transient Occupancy Tax revenue in pursuit of a housing objective, the expected housing benefit should be clearly identified.

Regulate Problems, Not Responsible Operators
SBAOR has consistently supported strong enforcement against STRs that create neighborhood impacts. Registration, Good Neighbor standards, a responsive complaint process, meaningful penalties, and escalating consequences for repeat violations directly address problematic operators. The City of Goleta has taken this approach, using a Good Neighbor Policy and a three-strike enforcement framework to address actual violations rather than broadly restricting responsible operators. Santa Barbara should similarly focus on behavior and demonstrated impacts.

This is particularly important for owner-occupied duplexes. For some buyers, purchasing a duplex and using income from the second unit is one of the few ways they can make homeownership financially feasible in Santa Barbara. Under the proposed framework, an owner living in one unit could be prevented from homesharing their own residence while operating the second, otherwise eligible unit as an STR. Owner occupancy also provides a high level of on-site accountability and neighborhood oversight. Rather than restricting this type of small-scale, owner-occupied use, SBAOR requests that the ordinance allow an owner-occupied duplex to obtain a Homeshare license for the owner's primary residence and an STR license for the second unit when both are otherwise eligible and comply with all City requirements.

The same principle should apply to ownership and license limitations. If a property is located in an eligible area, complies with operational requirements, pays applicable taxes, and does not create documented neighborhood impacts, the City should carefully consider what public benefit is achieved by prohibiting the use solely because of how the property is legally owned or because the owner holds another compliant license.

Coastal Access
STRs also provide a form of visitor accommodation that can be particularly useful for families and larger groups seeking kitchens, multiple bedrooms, and shared accommodations. Because the Title 28 amendments affect the Coastal Zone, the City should carefully consider how reducing STR availability may affect the range and affordability of overnight accommodations available to coastal visitors.

Moving Forward
SBAOR supports a clear STR licensing system and meaningful enforcement against operators who violate the rules. We believe the City can accomplish those goals without unnecessarily restricting responsible property owners or assuming that every STR eliminated will become long-term housing.

We respectfully ask the Council to make the targeted changes outlined above and ensure that the City's STR program is based on accountability, measurable outcomes, and demonstrated impacts.

Thank you for your consideration.

Sincerely,

Jennifer Berger

Jennifer Berger, 2026 President