

From: [Joe Zender](#)
To: [Randy Rowse](#); [City Clerk](#); [Mike Jordan](#); [Eric Friedman](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [Wendy Santamaria](#); [Meagan Harmon](#); [Laura Bradley](#)
Subject: Please Preserve the STR Exclusion in Santa Barbara's Coastal High Fire Hazard Area
Date: Sunday, October 4, 2026 7:43:01 PM

Some people who received this message don't often get email from joe.zender@pivitglobal.com. [Learn why this is important](#)

Dear Mayor Rowse and Members of the City Council,

My wife and I live in the Yankee Farm/Campanil neighborhood within Santa Barbara's Coastal High Fire Hazard Area. I am writing ahead of Tuesday's discussion of the proposed Short-Term Rental ordinance to ask that you preserve the exclusion of STRs and home shares from the Coastal High Fire Hazard Area.

For our neighborhood, this is fundamentally a public-safety issue.

Our area has long been recognized by the City as having significant wildfire risk, steep terrain, difficult access and limited evacuation options. Most importantly, the City Fire Marshal has supported excluding STRs and home shares from High Fire Hazard Areas because of evacuation and life-safety concerns.

That distinction matters. The Coastal High Fire Hazard Area should not be treated the same as the broader Coastal Zone simply because both are within the coastal boundary.

In our neighborhood, residents, visitors, service vehicles, firefighters and other emergency responders ultimately depend on the same constrained road system. During a major wildfire, additional transient occupancy means more people and vehicles trying to navigate roads they may not know at exactly the moment those roads are most critical.

The City's own wildfire planning also recognizes that human activity contributes to wildfire ignition risk and that visitors, human behavior and overloaded roads can complicate evacuation.

We have lived with this risk for years. This is not a hypothetical concern, and it is not simply an argument about noise, parking or neighborhood character. It is about whether transient commercial use belongs in an area the City itself has identified as particularly vulnerable to wildfire.

The proposed ordinance appropriately recognizes that difference by excluding STRs and home shares from High Fire Hazard Areas, including within the Coastal Zone.

I respectfully ask you to keep that protection in place.

Thank you for your consideration and for putting the safety of residents, visitors and first responders first.

Sincerely,

Joe Zender

Yankee Farm/Campanil Resident
Coastal High Fire Hazard Area

Joe Zender

PivIT Global, Founding Partner

Phone [REDACTED]

Mobile [REDACTED]

Email joe.zender@pivitglobal.com

From: [Eve Leeds](#)
To: [City Clerk](#)
Subject: Braemar/Yankee farm high fire restrict STRs
Date: Sunday, October 4, 2026 10:09:49 PM

Dear Mayor and Councilmembers,

Just a brief reminder as you consider the STR ordinance: **please do not allow STRs or homeshares in our Coastal High Fire Hazard Area.**

The City and Coastal Commission have long recognized the special fire and evacuation risks here. Our limited roads, dead ends, and large numbers of unfamiliar short-term guests make this a life-safety issue, not simply an STR issue.

Please pass the ordinance keeping the High Fire Hazard exclusion in place. The consequences of getting this wrong could be irreversible.

Thank you for listening to those of us who live here.

Sincerely,

Eve Leeds

From: [shannon harvey](#)
To: [City Clerk](#)
Subject: Vote No on Short Term Rental Ordinances, send the ordinance back to Planning Commission
Date: Monday, October 5, 2026 2:50:39 AM

[Some people who received this message don't often get email from shannon@shannon-harvey.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hello there,

I support regulating short-term rentals. Registration, a fee, noise enforcement, a way to shut down operators who cause problems, all of that is reasonable and overdue. I have read the two drafts, and I do not think these are those rules. I would rather wait than get this.

The first problem is that the ordinance is very hard to read, and law people cannot understand is law people cannot follow or enforce. The inland draft is one long section, lettered A through R and nested three levels deep, and you have to go to the zoning tables in two other chapters to find out where anything is actually allowed. The coastal draft's table of contents lists an "Insurance" section and a "Nonconforming" section that are not in the ordinance. Both drafts refer readers to subsections that do not exist.

The second problem is that the ordinance punishes the wrong things. What bothers neighbors is parties, noise, and parking. This ordinance's answer is a long list of obligations that have nothing to do with any of that: interior photographs, three proof-of-residency documents, a sign with the owner's phone number on the front of the house, a license that dies when the house sells, no corporations or certain LLCs, a two-year look-back for prior long-term tenants, annual building inspections, and a requirement that the owner defend the City in court. The actual party problem is handled by the City's existing noise ordinance, which the draft simply points to, plus a 60 minute callback. The thing that bothers neighbors is already illegal. What this ordinance adds is paperwork for the people who were never the problem.

The third problem is the fire-zone ban. Requiring evacuation information to be posted in every rental in a fire zone would be a good idea; the ordinance does not do it. Instead it bans rentals and homeshares in all four zones with no data, treats flat, hydrant-lined streets in the coastal zones the same as the Extreme Foothill zone, and exempts hotels and previously permitted units. If a street is too dangerous for a visitor, the City should explain why it is safe enough for the people who live there.

Fourth, this is supposed to be about housing. The staff estimate at the Ordinance Committee was that the City would give up about \$2.7 million a year in hotel tax. There is no estimate of how many homes would actually return to the long-term market in exchange. If the answer is "we don't know," then the Council is trading a known loss for an unknown gain, and the public deserves to hear that said out loud before the vote.

What I would support: a short, readable ordinance that registers every short-term rental and homeshare, charges a fee the public has seen, puts the City's enforcement number (not the owner's cell) on a card by the door, requires evacuation information in fire zones, and uses the existing noise and nuisance code to pull licenses from the operators who actually cause problems. That is the ordinance ten years of hearings should have produced. This is not it. Please send it back.

From: [Rob Fredericks](#)
To: [Oscar Gutierrez](#); [Mike Jordan](#); [Kristen Shedd](#)
Cc: [Dana Falk](#); [Allison DeBusk](#); [Kelly R. McAdoo](#); [Alelia Parenteau](#); [City Clerk](#)
Subject: Housing Authority Comment Letter - Inclusionary Housing Ordinance Amendments (CITY2026-00003)
Date: Sunday, October 4, 2026 10:18:33 AM
Attachments: [HACSB Ordinance Committee Inclusionary Housing Comments.pdf](#)

Dear Ordinance Committee Chair Gutierrez and Committee members,

Attached, please find the Housing Authority's comment letter regarding the proposed amendments to the Inclusionary Housing Ordinance.

Thank you,

Rob

Rob Fredericks | Executive Director/CEO
Housing Authority of the City of Santa Barbara
[808 Laguna Street Santa Barbara, CA 93101](#)
rfredericks@hacsb.org | hacsb.org |
direct [805-897-1051](tel:805-897-1051) | fax [805-564-7041](tel:805-564-7041)
TTY English [866-660-4288](tel:866-660-4288) | TTY Spanish [866-288-1311](tel:866-288-1311)

Satisfaction Survey
<https://hacsb.wufoo.com/forms/z10vm3va0gs5acu>



**HOUSING AUTHORITY
OF THE CITY OF SANTA BARBARA**

808 Laguna Street, Santa Barbara CA 93101

Phone (805) 965-1071 • Fax (805) 564-7041 • TTY English (866) 660-4288 • TTY Spanish (866) 288-1311 • info@hacsb.org • www.hacsb.org

October 5, 2026

Sent via email

Chair Guitierrez and Members of the Ordinance Committee
Ordinance Committee - City of Santa Barbara
735 Anacapa Street
Santa Barbara, CA 93101

RE: INCLUSIONARY HOUSING ORDINANCE AMENDMENTS (CITY2026-00003)

Dear Chair Guitierrez and Committee Members:

On behalf of the Housing Authority of the City of Santa Barbara, I urge you to support staff's recommended rental offset fee of \$91 per square foot throughout the City, including the Central Business District. We support the other proposed amendments outlined in the staff report. Our concern is the Planning Commission's recommendation to reduce the downtown rental offset fee to \$73 per square foot.

Our priority is to have affordable homes built within new developments. Inclusionary housing gives moderate income households the opportunity to live near jobs, services and transit alongside their neighbors. The proposed 10% rental requirement, with rents targeted at 110% of Area Median Income, serves households whose needs are often outside the reach of traditional affordable housing funding. As staff notes, fee revenue is less likely to replace these moderate-income homes because most available funding supports lower income households.

Paying the offset fee allows a developer to avoid the long-term obligations that come with providing affordable units within the development. These include a 90-year affordability covenant, limits on rents, tenant income verification, annual reporting and ongoing compliance requirements. Avoiding these obligations has real economic value, including greater flexibility in the property's future financing and sale. We believe developers will continue to find the option of paying \$91 per square foot attractive for these reasons. Reducing the fee to \$73 would give developers an additional incentive to pay the fee rather than provide the affordable homes we want built within new developments.

The BAE study also documents why new development should contribute meaningfully to affordable housing. Appendix D, Tables 26 and 28, estimates that every 100 new market-rate rental units generate demand for approximately 22 additional homes affordable to lower and moderate-income worker households through the local spending of new residents. This need spans several income levels. The same analysis supports a maximum rental fee of \$91.41 per net square foot, which staff has rounded down to \$91.

According to the staff report, the \$91 rate would generate approximately \$740,000 per affordable rental unit forgone, compared with approximately \$590,000 at \$73. That is roughly \$150,000 less to help produce a replacement home. We should evaluate this new offset option in practice before discounting it downtown.

The people who keep downtown running deserve the opportunity to call it home. If downtown growth does not include homes for the people who work there, we risk turning the Central Business District into an Exclusionary Housing District. Please recommend the \$91 rental offset fee citywide and preserve a strong incentive to build affordable homes within new developments. Thank you for your consideration.

Sincerely,

HOUSING AUTHORITY OF THE
CITY OF SANTA BARBARA

ROB L. FREDERICKS
Executive Director/CEO

From: [Carl Kocher](#)
To: [Randy Rowse](#); [City Clerk](#); [Mike Jordan](#); [Eric Friedman](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [Wendy Santamaria](#); [Meagan Harmon](#); [Laura Bradley](#)
Subject: Testimony for City Council Meeting October 6, 2026, Item 13
Date: Saturday, October 3, 2026 4:34:17 PM
Attachments: [SB City Council vote re STRs 10-6-2026.pdf](#)

Some people who received this message don't often get email from carlkocher@gmail.com. [Learn why this is important](#)

Testimony for the Santa Barbara City Council – October 6, 2026, Item 13

Topic: Short-Term Rental Ordinance

Dear Members of the City Council,

We are 26-year residents in the Yankee Farm (Braemar Ranch) area of Santa Barbara, zoned for single-family homes. This is a high fire hazard area in the coastal zone.

Short-term rentals (STRs - e.g., airbnbs) are a serious problem, as a number of properties near our home have been purchased by nonresident owners who widely advertise short-term rental stays. Our city needs homes for long-term residents, whereas each STR takes away a home for an established family.

STRs in our neighborhood are operating as businesses without legal permits, and the renters are often groups of unrelated people intending to get away with behavior that would not be tolerated at a hotel. In addition to excessive drinking and noise, short-term renters have lit bonfires, set off fireworks, and tossed burning cigarettes into our yard.

Wildfire is a major concern for all who live here. If a fire sweeps through, all residents will face mandatory evacuation via a single narrow access road for vehicles entering and leaving. Each STR may bring in a large bus or as many as a dozen vehicles, so fire engines might not be able to get through.

This is a serious situation in which the city must act to protect everyone. We hope you will agree that there is an urgent need to ACT IMMEDIATELY to BAN STRs in the coastal high fire zone.

Please vote to approve the Short-Term Rental Ordinance!

Very truly yours,

Carl A. Kocher, Marilyn Kocher, and Family

[REDACTED]

Santa Barbara, CA 93109-1000

carlkocher@gmail.com marilyntkocher@gmail.com

From: [Jayla Siciliano](#)
To: [Randy Rowse](#); [Wendy Santamaria](#); [Mike Jordan](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [City Clerk](#); [Eric Friedman](#); [Meagan Harmon](#)
Subject: Please Oppose Short-Term Rental Ordinances
Date: Sunday, October 4, 2026 8:28:04 AM

Some people who received this message don't often get email from jayla@atlas-vacations.com. [Learn why this is important](#)

Dear City Council,

Please do not adopt the proposed short-term rental ordinance as written.

I want to be clear at the outset that I am not opposed to regulation. Hosts in this city already pay hotel tax and hold business tax certificates and I believe safety standards should be increased for STR's.

I am, however, opposed to an ordinance that, as written, cannot be complied with by anyone who is not a hotel, and that seems designed to be violated.

Walk through a single Saturday night under this ordinance.

A neighbor calls at 11:15 p.m. about voices in the backyard. The host has to make a documented attempt to reach the guest within 30 minutes. The host also has to show up at the property within 30 minutes. Then, within 24 hours, the host has to fill out a City online form describing the complaint, every step taken, and how it was resolved. Miss any one of those three and each one is its own violation. The fines run up to \$1,500 for the first, \$3,000 for the second, and \$5,000 for every one after that within a year - and every day counts as a new violation. Three verified violations in a year and the license is not renewed; the property is then barred for two years. All of that before anyone has determined whether the voices in the backyard were actually louder than the City's noise ordinance allows.

Now add the rest. One license per person, and that includes any business they are connected to. For each application: a site plan, interior photographs, an affidavit signed by every owner on the deed, HOA consent, and a sworn disclosure of everyone with an ownership interest. A license that dies the moment the property is sold or the ownership changes hands. Every change of property manager is approved in writing by the City before it takes effect, so if the person who answers the phone quits, the host is technically out of compliance until a City official signs off.

The parking rules contradict themselves. One part of the ordinance says a short-term rental is a residential use of property. Another part says that for parking purposes it is "transient lodging," so none of the parking breaks that apply to homes, including the state law that waives parking requirements near transit, apply to it. The City cannot have it both ways in the same document, and eventually a court will say so.

And the biggest fact about the inland ordinance is buried in the zoning tables rather than said plainly: whole-home rentals are added to the commercial, office, and one manufacturing zone. They are not added to a single residential zone. The City's own website says that under today's rules, short-term rentals are treated like hotels and are only prohibited in the single-family and two-unit zones. This draft removes them from every inland residential zone. That is not a

licensing program. It is a ban with paperwork attached, and the roughly \$2.7 million a year in hotel tax that City staff told the Ordinance Committee would be lost is the direct result.

Additionally, last but far from least, short term rentals need stronger safety requirements for both whole-home STRs and hosted homeshares, but the draft leaves a critical question unanswered: **What specific guest-safety standards will these properties have to meet?** The proposed initial and renewal inspections are a valuable start. However, the broad reference to applicable building, zoning, fire, and health and safety codes does not clearly explain what inspectors will check or which protections will be required for paying guests.

Other California cities provide more specific guidance:

- **San Diego's STR safety checklist** addresses extinguisher placement and servicing, fireplace screens, fire-pit approval and separation, safe exits, and pool safety.
- **South Lake Tahoe's inspection checklist** includes hot-tub covers and emergency shutoffs, bedroom evacuation maps, emergency lighting, chimney-cleaning documentation, and stair and deck safety.
- **Palm Springs** requires safety inspection and pool certification documentation for homeshares as well as vacation rentals.

Santa Barbara should provide comparable clarity before adoption. Guests are unfamiliar with a property and may be using its fireplace, grill, pool, hot tub, sauna, or bunk beds for the first time. The inspection standards should explicitly address these risks, including appropriate extinguisher placement, safe grill locations, amenity instructions and warnings, pool rescue equipment, hot tub sanitary maintenance records, trip hazards, and safe stairs and decks. **Hosted homeshares need these protections too.** The draft requires hosts to be physically present from 10 p.m. to 7 a.m., leaving guests potentially using these amenities without the host present throughout the day. Overnight host presence does not eliminate daytime safety risks if owners are negligent in their upkeep of these risky elements that fall outside of residential building safety code.

Imposing much stricter safety code in itself would reduce the number of short term rentals by weeding out lazy operators and owners.

Please defer adoption until these standards are clearly defined and available for public review. Guest safety should be an explicit, enforceable part of this ordinance.

Sincere thank you for reconsidering passing this ordinance as it is currently written,
Jayla

--

Jayla Siciliano

[REDACTED]

From: [Samantha Ireland](#)
To: [Samantha Ireland](#)
Subject: Please Oppose The Short Term Rental Ordinances
Date: Friday, October 2, 2026 4:23:52 PM

Some people who received this message don't often get email from samantha@vacationrentalsofsantabarbara.com. [Learn why this is important](#)

Dear City Members,

I am writing to ask you not to adopt the coastal short-term rental ordinance.

The coastal zone , West Beach, the harbor, the Funk Zone, the Mesa's coastal edge, is where Santa Barbara has always welcomed visitors, and the Coastal Act requires the City to protect lower-cost places for them to stay. The Coastal Commission has pressed the City for years to adopt real rules instead of a quiet ban, and Commission staff have already signaled that what the City has produced so far is not ready. Nothing in this draft fixes that.

The ordinance draws a "license area" on five maps and bans whole-home rentals everywhere else in the coastal zone. The maps are not explained anywhere in the text. There are no criteria for where the lines fall, no findings about visitor access or affordability, and no appeal if a building lands one street on the wrong side. It also extends the fire-zone ban to the City's coastal fire zones, even though the ordinance's own definitions say only the foothill zones are the state's very-high severity areas. A condo near sea level is not a wildfire-evacuation problem, and no one has claimed otherwise with evidence.

It's hard to imagine the Coastal Commission will approve this. It will get it sent back, after another year, and the City will be exactly where it is today. Get it right once instead of twice and send it back to planning.

Samantha Ireland

President, Vacation Rentals of Santa Barbara, Inc

 | www.vrosb.com | 924 Laguna St, Suite B, Santa Barbara, CA 93101



From: [Ginger Rubsam](#)
To: [Randy Rowse](#); [Wendy Santamaria](#); [Mike Jordan](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [City Clerk](#); [Eric Friedman](#); [Meagan Harmon](#)
Subject: Opposition to Short Term Rental Ordinances
Date: Friday, October 2, 2026 6:16:28 PM

Some people who received this message don't often get email from ginger93103@gmail.com. [Learn why this is important](#)

Dear Mayor Rouse and Members of the City Council,

Would you want a stranger monitoring you while your family is on vacation? If you had babies or toddlers, would you prefer staying in a house or apartment with a kitchen to prepare food when needed and a space where everyone could hang out together, or would you want to squeeze into one or more hotel rooms (separating the parents so the kids wouldn't be alone), and have to lug the kids and their paraphernalia to restaurants? For me, the obvious answers are no strangers supervising my family's temporary stay, and no hotel room.

As someone who loves our Santa Barbara community, I think the proposed regulations—especially the on-site owner requirement - would feel like Big Brother is watching everything I do. Requiring an owner to be physically present on-site removes the primary appeal of a vacation rental for visiting families, who often seek privacy, comfort, and independence. Co-living dynamics can create uncomfortable situations for both hosts and guests, while heavily restricting an owner's personal autonomy and daily life.

This ordinance feels like a heavy-handed approach that punishes responsible, caring local operators without truly addressing root nuisance issues like noise, parking, or occupancy. The economic impact on our neighborhood will be significant. City staff estimate a loss of roughly \$2.7 million annually in hotel tax revenue, and many travelers will simply spend their vacation dollars in nearby cities like Carpinteria, Goleta, or Ventura. This loss of income directly threatens the financial security of local hosts who depend on rental income to afford their mortgages and care for their properties.

Additionally, the proposed licensing structure feels overly complex and stressful. With mandatory annual inspections, complex multi-page regulations tied to separate zoning tables, and no appeal process upon denial, it creates an environment where few local hosts can realistically comply.

These rules would effectively eliminate sustainable short-term rentals in Santa Barbara, which would hurt so many of our neighbors. I hope you will consider a more balanced approach and vote no on the proposed ordinances.

Sincerely,

Virginia Rubsam

From: [Steve Fort](#)
To: [City Clerk](#); [Laura Bridley](#)
Subject: 10/6/26 City Council Item 13 - STR Ordinance - Public Comment
Date: Saturday, October 3, 2026 8:38:38 AM

Dear Ms. Bridley and Council Members,

There is no compelling reason to allow short-term vacation rentals (STR) in residential zones where commercial uses and hotels are not allowed (Coastal or Inland).

We strongly support a permanent STR enforcement program and the prohibition of STRs in single family and two-unit zones of the City. If they are going to be allowed at all, allow them where they belong - in commercial zones and zones that allow hotels.

The argument that STRs are low cost lodging alternatives that bolster our local tourism economy is dubious at best. **Our neighborhoods and quality of life for local residents are more important**, and more tangible. We all know short-term vacation rentals impact housing affordability and have the potential to destroy the fabric of neighborhoods. **Our neighborhoods are more important than a budget impact or profits for the disingenuous few.**

Please regulate STRs to the maximum extent feasible, and continue enforcement efforts against illegal short-term vacation rentals and those who selfishly choose greed over community.

Steve and Cecilia Fort

[REDACTED]

From: [Debra Smitham Luther](#)
To: [Randy Rowse](#); [Wendy Santamaria](#); [Mike Jordan](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [City Clerk](#); [Eric Friedman](#); [Meagan Harmon](#)
Subject: Please oppose the short term rental ordinance
Date: Saturday, October 3, 2026 1:23:49 PM

Some people who received this message don't often get email from debra_smitham@yahoo.com. [Learn why this is important](#)

Dear leaders,

Our family has been utilizing short term rentals in the Santa Barbara area for fifteen years. We are quiet, pay rental taxes, and support local businesses during our stays. We hope you will oppose the latest version of the short-term rental ordinance.

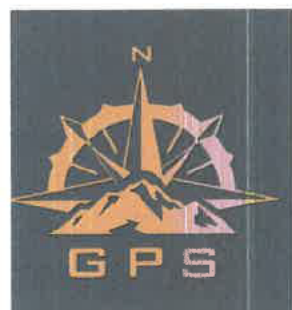
The case for these ordinances rests on nuisance complaints: parties, noise, parking. Those problems are real when they happen, and they are already illegal. The City has a noise ordinance and a short-term rental enforcement program today, and the drafts simply point back to them. What the ordinances add is not better enforcement against the few operators who cause problems. It is a wall of paperwork for everyone else: interior photos, affidavits from every owner, HOA letters, a sworn ownership disclosure, a sign with your phone number on the house, that same number mailed to every neighbor within 300 feet, a 24-hour online report after every complaint whether or not it had merit, an inspection every year, a fee no one has named, and fines of up to \$5,000 a day for getting any of it wrong. A host who misses a form is treated the same as one who hosts a party.

If the goal is responsible operators, this is backwards. People who want to follow the rules need rules they can follow. Please send this back and ask staff for something simpler: a registration, a reasonable fee announced in advance, a number on every listing, and real consequences for the operators who actually generate complaints.

Thank you for your consideration,

The Smitham family

GPS Fund Management



Gianpaolo Starita
Manager
GPS SB Springing LLC
2500 N Buffalo Drive, Suite 130
Las Vegas, NV 89128

September 16, 2026

Mayor and Members of the Santa Barbara City Council
City of Santa Barbara
Santa Barbara, California

RE: West Beach Parking, Public Safety, and Neighborhood Conditions

Dear Sirs,

I am writing to respectfully request that the parking in the West Beach area be restricted to Residents and Hotel guests only. There are a lot of unhoused persons living in vehicles along these streets currently, and it is having a serious negative impact on area hotels.

I would like to take a moment to thank you for your service to the community. I recognize that you face many difficult issues and must weigh various factors in deciding what is best for the City. I recognize that the City of Santa Barbara weighs all decisions with an eye on humanitarian decision making. It's not easy, so thank you for your service.

We own and operate the recently renovated Beach House Inn at 320 W Yanonali Street in the West Beach section of the City. The Property is at 320 W Yanonali Street, next to the Lavender Inn. We have owned the Property since 2022. We have also been in discussions about acquiring additional properties in the area.

In our time working on this project, we have had numerous negative interactions with the homeless population that lives in vehicles along the streets near the hotel.

The interactions have included numerous break ins, where we found people literally shooting up drugs in the rooms. We had to maintain an increased security presence which cost a lot of money during this time. They also break into the property to steal things, and defecate on the grounds. Additionally, there is a significant amount of plainly visible human waste on the sidewalks just outside our hotel, across the street, and in the immediate area.

GPS Fund Management

There have also been several scary interactions with the unhoused in the area on the street. Without provocation, our team and some of our guests have been verbally threatened and witnesses to some disturbing behavior. We have been afraid of physical violence.

We hear about it almost daily from our guests, and not in a good way.

The West Beach area is a prime destination for tourists that want to be able to walk to State Street, the Funk Zone, the beach, and the Marina. When guests are afraid to walk to these areas for fear of something bad happening, it impacts our ability to rent the rooms and generate taxes for the City.

I want to point out that our organization works diligently to help homeless and drug addicted communities. As an example, we acquired and master leased a 58 room hotel in Las Vegas to a sober living group working to help people transition through recovery. This was the purpose of the acquisition. We do this in part because the mother of my children died of a drug overdose. We are not blind to the plight of the less fortunate. That does not mean it is appropriate to invite the homeless to live on these particular streets.

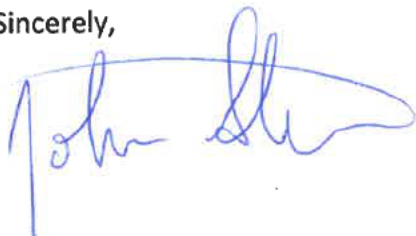
Having spent significant amounts of time walking the West Beach area, it is obvious that the only legitimate reason to park on these streets is for guests of the hotels and occupants of residences in the immediate area. There are no businesses within walking distance, and the park has more than enough parking. People are not parking here to go to the Beach, State Street, the Marina or any other local attraction. Those areas have sufficient parking nearby.

Therefore, restricting parking to these specific uses should not create any negative unintended consequences for the rest of the City.

We hope that this situation will be placed in an upcoming City Council Agenda, so that we may have a good discussion on the topic. That discussion should lead to reforms that will protect the viability of West Beach as a tourist destination.

Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Shu". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

From: [Grace Park](#)
To: [City Clerk](#)
Subject: STR Ordinance
Date: Friday, October 2, 2026 1:33:34 PM

Some people who received this message don't often get email from gparkmail@gmail.com. [Learn why this is important](#)

Dear Mayor and Council Members,

I am writing to ask that you preserve the proposed exclusion of STRs and homeshares from all High Fire Hazard Areas—including the Coastal High Fire Hazard Area—and vote to move the ordinance forward.

Our neighborhood lies within the Coastal Zone and is separately designated as a Coastal High Fire Hazard Zone. This makes our neighborhood completely inappropriate for STRs. There is only one narrow road leading into our neighborhood which makes evacuating our area extremely difficult. There are 3 STRs on our street or directly abutting it and they have brought large numbers of groups of people who have no regard for the safety of others. I have witnessed bus loads of guests being disgorged and the lighting of fireworks and the discarding of cigarettes carelessly. There has been the addition of storage sheds as extra rooms on nearby properties without regard to fire safety. The STRs in our neighborhood are definitely not low cost accommodations and are run purely for profit. We bought our home because we loved the neighborhood and this has completely changed our quality of life. We are now worried about the safety of our families and neighbors.

The Fire Marshal supports excluding STRs and homeshares from high Fire hazard areas such as ours because of evacuation and life safety risks.

I respectfully ask that you preserve the exclusion of STRs and homeshares from the Coastal High Fire Hazard Area and approve the ordinance without further delay.

Please move the ordinance promptly to the California Coastal Commission. Please consider how the Coastal High Fire Hazard Area can immediately be protected during the lengthy review and implementation process. Every additional STR stay creates an avoidable risk to our neighborhood and coastline.

The STR investors have money and lobbyists on their side to protect their revenue streams.

We are asking you to protect our families and community.

Thank you for your time and efforts.

Grace Park

Braemar/Yankee Farm Resident

Coastal High Fire Hazard Area

From: [Jennie Strait](#)
To: [Randy Rowse](#)
Subject: Vote No on Short Term Rental Ordinances
Date: Friday, October 2, 2026 3:16:10 PM

Some people who received this message don't often get email from jennie@acmebycasago.com. [Learn why this is important](#)

To whom it may concern,

I strongly oppose this short-term rental ordinance. With professional management, neighbors will not be bothered, and homeowners should be able to profit from their investment.

When people point out that these ordinances ban whole-home rentals in every inland neighborhood and most of the coastal zone, the City's answer is that homeshares are still allowed. I want to explain why that is not an answer.

A homeshare is a spare bedroom with the owner down the hall. That works for a solo traveler. It does not work for a family of five coming to the beach for a week, for the grandparents visiting a new baby, or for a wedding party that needs a kitchen. Those visitors need a whole home. The Coastal Act requires the City to protect lower-cost access to the coast, and in Santa Barbara the lower-cost option for a family has never been a hotel room. It has been a rented house or condo near the water. An ordinance that leaves only hosted rooms does not preserve coastal access. It reserves the coast for people who can afford two hotel rooms a night.

And even the homeshare path is not what it sounds like. To rent one bedroom in your own home, the inland draft requires a site plan, interior photographs, an affidavit, three documents proving you live there, a building inspection before the license and again every year, a sign with your name and phone number on the outside of the house, that same information mailed to everyone within 300 feet, being home every night from 10 p.m. to 7 a.m., a 30-minute response time, a 24-hour online report after every complaint, two years of records, a promise to pay the City's legal costs, a fee that has not been announced, no appeal if the City says no, and fines of up to \$5,000 a day. If the house is in one of the four fire zones, none of that matters, because homeshares are banned there too.

So the ordinance takes away whole-home rentals, offers homeshares in their place, and then makes homeshares nearly impossible. That is not a compromise. Please do not adopt this on October 6. Bring back a version that allows whole-home rentals in residential neighborhoods with a cap, keeps the coastal zone open to the families who have always come here, and treats a spare bedroom like a spare bedroom.

Thank you for your consideration,

Jennie Strait | Portfolio Growth Executive

Phone: 805-701-8026

Owner Success

Email: owner@casagosocal.com

Casgo Logo



Phone: (760) 558-4009

Guest Support

Email: reservation@casagosocal.com

Phone: (760) 537-6512

From: [ST441 Manager](#)
To: [Santa Barbara City Council](#)
Cc: [City Clerk](#)
Subject: Soliciting
Date: Friday, October 2, 2026 12:51:17 PM
Attachments: [image001.png](#)

Some people who received this message don't often get email from st441manager@sprouts.com. [Learn why this is important](#)

Good afternoon,

Just wanted to reach out in regards to soliciting happening in front of the store. Property Management is in the loop and are working with their people but solicitors are in front of the store getting signatures and receiving \$10 per signature. They will not leave from the entry way after they have been spoken to and do not want to listen or be willing to cooperate.

Thank you,

Isaiah Munoz

Isaiahmunoz@sprouts.com

Store Manager

Sprouts Famers Market #441

805-837-0356

29 S Milpas St.

Santa Barbara, CA 93103



SPROUTS

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From: [Tiffany Haller](#)
To: [City Clerk](#)
Subject: Public Comment: 13. Subject: Short-Term Rental Program Ordinances
Date: Friday, October 2, 2026 12:35:04 PM
Attachments: [106 Council Meeting - Oct 6 - public comment - TKHaller.pdf](#)

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Attached. Please include in public record.

Thank you,
Tiffany Haller

October 1, 2026

Mayor Rowse and Members of the City Council:

I have been involved in Santa Barbara's short-term rental discussion, debate and deliberations for more than a decade and serve as a board member of the Santa Barbara Short-Term Rental Alliance and past SBAOR Government Relations Committee when STRs were originally shut down. I am also a 26 year SB resident and property owner of a home in the coastal zone and local small business owner. My husband and I raised both our children in this coastal home, they attended local public schools and my son worked for many years for the City of Santa Barbara. We are very embedded in the community on the Mesa and West Beach neighborhoods as well as the Miramar Beach area of Montecito.

For years, responsible operators have asked for reasonable regulation:
License them. Regulate them. Enforce against nuisance properties. Hold bad operators accountable.

What is before you now goes much further and does not address what we have repeatedly asked each council member to consider even though many refuse to even give us time to meet. For something this large in impacts on our local economy, environment and specifically substantial portions of Santa Barbara's Coastal Zone, it begs the question why is this not being fully investigated? Where is the data?

I am submitting this letter so the following issues and unanswered questions are clearly preserved in the public record before Council acts and for when this ordinance reaches the California Coastal Commission.

The City can quantify what it will eliminate, but not what this elimination will accomplish and possible unintended consequences. Why?

The City's own analysis estimates that approximately 265 Coastal Zone STR sites currently paying TOT could decline to fewer than 65, with an estimated \$2.3–\$3 million annual loss in TOT, which we have researched is in reality actually more than this number.

Yet after more than ten years:

1. How many long-term housing units is this ordinance projected to create? **Where is the data?**
2. What percentage of existing STRs have documented, verified nuisance violations? What are the complaints for other types of rentals, owner occupied homes? **Where is the % data city-wide?**
3. What evidence quantifies the amount of long-term "housing" actually displaced by STRs? **Where is the data?**

Those are fundamental questions because housing and neighborhood impacts are being used to justify the restrictions. The City can quantify what it intends to eliminate. It should be equally capable of quantifying the problem it says this elimination will solve.

Why weren't the Planning Commission's concerns with this ordinance and alternatives fully analyzed?

The Planning Commission raised many concerns and were essentially "forced" to send this to ordinance committee after the City Attorney directly instructed them that it would not meet "Council's deadline". They offered more comprehensive alternatives and not a ban which this truly is. The City's own report also acknowledges that Coastal Commission staff has expressed concern about prohibiting STRs in single- and two-unit residential zones.

Why were those alternatives not fully analyzed before choosing this BAN masquerading as regulation?

That question becomes even more significant given Santa Barbara's own history.

The Coastal Commission has seen this before.

Santa Barbara County previously proposed prohibiting STRs in residential Coastal Zone areas with essentially one small residential exception around Miramar Beach.

The Coastal Commission denied that amendment.

The Commission specifically found the proposal too restrictive given the low supply and high cost of traditional overnight accommodations and found the resulting reduction in visitor-serving accommodations inconsistent with the County's LCP and the Coastal Act. More recently, Pacifica's STR restrictions received significant Coastal Commission scrutiny and were modified to preserve greater STR availability.

And Pacifica is by far NOT Santa Barbara.

Santa Barbara has been a tourist destination and coastal access point long before any of us were born. Generations have traveled here to experience our beaches and coast. We do NOT own the coast and the city does not own the housing here either.

Tourism in Santa Barbara was not created by Airbnb or vacation rentals.

Whether we personally like tourism in our city or not, its impacts are enormous and cannot simply be ignored when making coastal policy. Visitors support our restaurants, shops, housekeepers, maintenance workers, tradespeople and local jobs. They generate substantial City revenue and support businesses our residents themselves want to keep. They have for decades, even in the 1920's and 30's with some of the existing STRs part of an extension of the famous Potter Hotel in West Beach.

To craft an ordinance this consequential while disregarding the reality that Santa Barbara has been a world-renowned tourist destination and coastal access point for generations is not responsible policymaking. It is a refusal to confront the very impacts this decision will create.

At a time when hotel rates, dining and virtually every aspect of travel continue to become more expensive, vacation rentals also provide families an alternative: they can stay together, share the cost and prepare meals rather than purchase multiple hotel rooms.

Coastal access is not meaningful if ordinary families increasingly cannot afford to stay near the coast.

So how does potentially reducing approximately 265 tax-paying Coastal Zone STR sites to fewer than 65 protect or maximize public access to one of California's best-known coastal destinations?

That deserves a serious answer from the City and, ultimately, serious scrutiny by the California Coastal Commission as it relates to the Coastal Act and access for those less fortunate on limited means.

These concerns extend far beyond STR operators.

1. **Visit Santa Barbara, the Santa Barbara South Coast Chamber of Commerce and the Santa Barbara County Taxpayers Association** have raised concerns about the economic consequences and the need for greater analysis.
2. Our own **Planning Commission** raised serious concerns and spoke out at ordinance committee again.
3. **Coastal Commission staff** has raised concerns about the proposed geographic restrictions.

And the Coastal Commission has already rejected a highly restrictive STR approach in Santa Barbara County.

How many warnings should it take before the City completes the analysis? What is before you had no formal analysis and only an agenda of some on this council.

The City's projected TOT loss is only the easiest impact to measure. It does not capture lost spending at restaurants and shops, fewer housekeeping and maintenance jobs, reduced work for local tradespeople, or the

broader effect on Santa Barbara's visitor economy. How will it impact the environment and congestion in neighboring communities when Santa Barbara rentals are eliminated?

Whether people want to hear it or not, this is much bigger than STR owners.

It is about coastal access, affordability, jobs, restaurants, small businesses, City revenue and the people whose livelihoods depend upon our visitor economy.

There is also an affordability inconsistency worth examining.

This Council has recently taken significant action based on concerns about Santa Barbara's extraordinary cost of living and protecting residents from housing costs. Those same working residents also travel and when they do much like many council members admit to, stay in vacation rentals which provide accommodations that if not available would eliminate them from being able to travel to that specific destination. At least these same people you are protecting under rent control are given the opportunity to live along the coast but many other residents in California cannot.

Are we saying that if other people that can't live here can also no longer access the coast they have for over 100 years because it's no longer affordable to them? Seems like a double standard. And home shares we all know very few people use. **But even broader, what is the hard data how this will impact our local economy, our essential services and businesses?**

We cannot argue that affordability is paramount when discussing housing while treating affordability as irrelevant when discussing public access to the coast we do not own.

Before Council votes, I ask that these questions be clearly answered—or clearly remain unanswered in the record:

1. How many long-term housing units is this ordinance projected to create? **Where is the data?**
2. What percentage of existing STRs have documented, verified nuisance violations? **Where is the data?**
3. What evidence quantifies the amount of long-term housing actually displaced by STRs? **Where is the data?**
4. Why weren't the Planning Commission's concerns addressed and fully analyzed? **Where is that data they requested?**
5. What is the complete economic impact on jobs, restaurants, local businesses and visitor spending, not simply TOT? **Where is the data?**
6. How does eliminating a substantial portion of Santa Barbara's existing Coastal Zone visitor accommodations protect or maximize public coastal access? **Where is the data?**
7. Why is Santa Barbara again pursuing a highly restrictive geographic approach when the Coastal Commission previously denied Santa Barbara County's Miramar-centered approach as too restrictive? **Why?**

These are not questions about whether STR owners or neighbors like this ordinance.

They are questions about whether the evidence supports it.

The timing should not change that analysis. After more than ten years, there is no reason political calendars or changing Council or Commission composition should substitute for a complete evidentiary record.

Santa Barbara has already spent years and public resources litigating STR policy. We should not need another lawsuit (or another Coastal Commission rejection) to force answers to questions that can be answered now.

Regulate. License. Enforce against bad operators. This ordinance is only a ban and "Pathway to NO".

But if the City instead chooses broad geographic prohibition, it should be prepared to demonstrate with evidence what measurable problem requires that level of restriction, what measurable benefit it will produce, why less restrictive alternatives were rejected, and how eliminating this visitor inventory is consistent with California's coastal-access requirements. That showing has not been made in the material presently before Council.

Santa Barbara was a coastal visitor destination long before STRs, Airbnb, this Council or any of us were here.

That reality does not disappear because tourism may sometimes be unpopular. But for those owners that think removing STRs will somehow now allow them to pick their neighbors, as a Mesa resident and SB resident of over 26 years with 24/7 dogs barking next door, sober living home across the street, 10 college students to a 3 bedroom home and flat screen TVS on roof top decks facing my home with complete disregard for my family, etc....brace yourself for what could be coming next door to you.

After ten years, "now is the time" is not evidence.

Today it is STRs. Tomorrow it could be your ADU, your ability to rent a room, or another lawful use of your own home that suddenly becomes politically unpopular. You do not have to support STRs to understand the precedent being set when government eliminates a property use without first producing clear evidence with supporting data of the problem it claims to solve.

Respectfully,

Tiffany Haller

From: [Jacques Habra](#)
To: [Randy Rowse](#); [Wendy Santamaria](#); [Mike Jordan](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [City Clerk](#); [Eric Friedman](#); [Meagan Harmon](#)
Subject: Please Vote No on Short-Term Rental Ordinances
Date: Friday, October 2, 2026 8:13:58 AM

Some people who received this message don't often get email from jhabra@gmail.com. [Learn why this is important](#)

Dear Mayor Rowse and Members of the City Council,

I support the City's goal of creating a clear, enforceable licensing system for short-term rentals. But after reviewing the current draft, I am concerned that what is being presented as a licensing program is actually an elimination or ban program.

The most important adjustment I ask the Council to consider is straightforward: **at a minimum, grandfather existing operators who are already registered with the City, have established TOT accounts, have consistently paid TOT and TBID, and remain in good standing, subject to reasonable operating standards and enforcement for verified violations.**

This can be done without creating a permanent entitlement. The draft already provides that an STR license is personal and nontransferable and expires upon a transfer of the property or a change in controlling ownership. A grandfather provision could use exactly that framework: allow an existing registered operator to continue while that owner remains in place and compliant, but have the grandfathered authorization terminate upon sale. The number of grandfathered units would therefore decline naturally over time rather than being abruptly eliminated.

The financial burden of the proposed program is also substantial. Staff has proposed an initial STR/Homeshare licensing fee of \$3,334, an annual renewal fee of \$2,897, and a \$306 late fee. The ordinance also requires a Building Official inspection before the initial license and before every annual renewal. For an owner who rents a residence only intermittently or a few weeks each year, those fixed annual costs can be significant.

There is a more measured way to accomplish the City's objectives without forcing out existing taxpayers who have already established a history with the City.

I ask the Council to consider at least the following framework:

1. **Grandfather existing registered, TOT-paying operators** who meet a clearly defined pre-ordinance cutoff date and are current on their taxes.
2. Make the grandfathered authorization **personal to the existing owner and nontransferable**, terminating upon sale or a change in controlling ownership, just as the draft already provides for STR licenses generally.
3. Require grandfathered operators to comply with reasonable health-and-safety, occupancy, noise, parking, local-contact and tax requirements.
4. Allow suspension or revocation for **verified violations**, rather than eliminating an otherwise compliant operator simply because a zoning map changed.

5. For new STRs going forward, the Council can establish whatever geographic limits or overall cap it determines appropriate through the legislative process.
6. Reevaluate the annual inspection and fee structure so that it is proportionate, particularly for small operators who rent only occasionally.

This approach would not create an unlimited or permanent STR inventory. It would establish an orderly transition: compliant existing operators could continue under regulation, while the grandfathered inventory would diminish through ordinary property sales. It would also preserve an enforcement mechanism against operators who actually cause documented neighborhood problems.

The City has said that one purpose of this ordinance is to create a “reliable permit path” and clear operational standards. I hope the Council will ensure that there is also a reasonable path for the people who have already come forward, registered with the City, collected and remitted its taxes, and operated responsibly.

Regulation of noise, parking, occupancy, safety and genuinely problematic operators is understandable. But existing registered taxpayers deserve consideration in the transition to an entirely new regulatory system.

Please amend the ordinance to provide a grandfather provision for existing registered, TOT-paying operators in good standing, with the authorization tied to the current owner and ending upon transfer of the property.

Thank you for your consideration.

Sincerely,
Jacques Habra

Jacques Habra

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From: [Ernest Salomon](#)
To: [Santa Barbara City Council](#)
Cc: [newsmakerswithjr@gmail.com](#); [nick@independent.com](#); [jean@independent.com](#); [jmolina@noozhawk.com](#); [ed@edhat.com](#)
Subject: Rent Control Vote
Date: Friday, October 2, 2026 11:50:05 AM

To the four of you who voted for rent controls:

Randy's piece is on the money and those of you who voted for rent controls will regret it long after your council terms expire or term out.

The sad thing is that the working people constituents who you claim to represent will be the ones who will be most adversely affected by rent controls.

With these brutal rent controls, you have effectively rationed housing here because new affordable and market rent housing will be more difficult than ever to be built with private money. Existing rental housing repairs and maintenance will suffer even more from neglect from owners stifled by less income from their units.

I don't think most of you know this, but Canadian soft lumber prices have gone through the roof because of Trumps tariffs. We were importing about 33% of our lumber from Canada. Watch this!

You have just made made the total local tight and expensive housing market worse!

Sincerely,

Ernest Salomon

[REDACTED]

Santa Barbara, CA 93108

[REDACTED]

Ernstsal@aol.com

From: [Paolo Dorigo](#)
To: [Randy Rowse](#); [Wendy Santamaria](#); [Mike Jordan](#); [Oscar Gutierrez](#); [Kristen Sneddon](#); [City Clerk](#); [Eric Friedman](#); [Meagan Harmon](#)
Subject: Oppose Short-Term Rental Ordinances
Date: Friday, October 2, 2026 11:53:29 AM

Some people who received this message don't often get email from pdorigo@icloud.com. [Learn why this is important](#)

Dear Members of the Board,

I'm writing as a local property owner who has invested significant time, money, and care into maintaining a home that is also operated as a short-term rental.

I understand the need for sensible regulation. I support reasonable rules, licensing, accountability, and strong enforcement against operators who create problems for their neighbors. What concerns me about the proposed ordinance is that it appears to go considerably further than creating a clear permit path for responsible short-term rentals.

As drafted, whole-home rentals in the inland area would be limited largely to commercial and office zones, while residential neighborhoods would effectively be excluded. For many existing owners who would otherwise be willing to register, obtain a license, follow the rules, and operate responsibly, there would simply be no path available to them.

My understanding is that short-term rentals are currently prohibited in single-family and two-unit zones. The proposed draft would extend those restrictions to additional residential zones, including areas with apartments and condominiums where short-term rentals may currently operate. From the perspective of an owner trying to comply with the rules, that feels less like the creation of a permitting system and more like an expansion of the existing prohibition.

I am not asking the County to operate without rules. Quite the opposite. I believe a well-designed licensing program could protect neighborhoods while still allowing responsible property owners to participate.

A reasonable cap on licenses, registration numbers displayed on every listing, clear operating standards, and meaningful enforcement against nuisance properties would, in my view, address the legitimate concerns

surrounding short-term rentals without eliminating responsible operators altogether.

Owners who maintain their properties, respect their neighbors, pay their taxes and fees, and comply with reasonable regulations should have an opportunity to obtain a license rather than being excluded simply because their property happens to be located in a residential neighborhood.

I respectfully ask that you continue this item and bring back a revised ordinance that creates a genuine permit path for residential properties, subject to an appropriate cap and meaningful safeguards for the surrounding community.

Thank you for considering the perspective of those of us who are trying to operate responsibly and remain good members of the community.

Sincerely,

Paolo Dorigo



From: [Joni Kelly](#)
To: [Joni Kelly](#)
Subject: TIME-SENSITIVE - Local Impacts of the Trump Administration's NPRM for Head Start
Date: Wednesday, September 30, 2026 1:48:48 PM
Attachments: [image001.png](#)
[PR_HS-NPRM CHANGES_Sept2026_FINAL.pdf](#)
[NHSA Final Comment Executive Summary.pdf](#)
[NPRM Guide and One-Pager_FINAL.pdf](#)
[Potential Impacts of the NPRM on CommUnify Children's Services_FINAL.pdf](#)
Importance: High

Dear Local Representative:

CommUnify and its **Head Start** program need the community's help. Proposed changes to the national Head Start program – which the nonprofit has overseen in Santa Barbara County for nearly 60 years – could dramatically reduce the high-quality of this vital child care and early education program. New requirements contained in the Trump administration's **Notice of Proposed Rulemaking (NPRM)** entitled [“Reducing Federal Burden for Head Start Programs”](#) (RIN 0970-AD30) could severely lower the guidelines and standards that have made the program so effective for more than six decades. Head Start, which is free for families who income qualify, was signed into law by President Linden B. Johnson as part of the [“Economic Opportunity Act of 1964”](#) and was designed to disrupt intergenerational poverty and implemented to provide low-income children and their families with a pathway to success via education, health screenings, and nutritious meals.

Should this NPRM be passed in its current form, some of the local negative impacts will include removal of important health and dental screenings for the children, an increased child-to-teacher ratio which may result in the children receiving less individualized attention from the teachers and, nationally, could present safety concerns, cutting bi-lingual education services, cutting services for children with disabilities, and a 66% reduction in the administrative funds allocated to help run the program. CommUnify recently released their [“Scissors” advocacy PSA](#) to inform the Santa Barbara County community about these proposed cuts. Please see resource materials citing sources and impacts of the proposed changes to the Head Start program attached and embedded in the press release.

CommUnify is asking for your and the public's for support in letting Congress know the importance of **not implementing these onerous changes**. Government leaders are required to review each and every comment prior to voting on the legislation. The link to submit a comment by **no later than October 6th** to the federal government is here: [Regulations.gov](#).

Please contact me for more information about the proposed changes contained in the NPRM and please spread the word to your constituents and colleagues. As always, we appreciate your continued support.

Warmest wishes,

~ *Joni*

Joni Kelly

Communications & Outreach Coordinator

Community Services

Tel: 805.964.8857 ext. #1109

Mobile: 805.886.1869

www.communifysb.org/services/community

www.211santabarbaracounty.org



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FOR IMMEDIATE RELEASE

SANTA BARBARA, CALIFORNIA ~ September 30, 2026

CommUnify Encourages Public Comment Regarding Changes to Head Start Program Before October 6th Deadline

Onerous new requirements outlined in the 153-page Notice of Proposed Rule Making (NPRM) will negatively impact the delivery of these vital early education services in Santa Barbara County

CommUnify and its Head Start program need the community's help. Proposed changes to the national Head Start program – which the nonprofit has overseen in Santa Barbara County for nearly 60 years – could dramatically reduce the high-quality of this vital child care and early education program. New requirements contained in the Trump administration's **Notice of Proposed Rulemaking (NPRM)** entitled ["Reducing Federal Burden for Head Start Programs"](#) (RIN 0970-AD30) could severely lower the guidelines and standards that have made the program so effective for more than six decades. Head Start is not merely childcare. The program includes health screenings for vision and hearing, behavioral wellness assessments, nutritious meals and snacks, as well as parenting classes and support. CommUnify operates 18 of these early childhood centers throughout Santa Barbara County and currently serves more than 500 children and families who could otherwise not afford high-quality child care and early educational opportunities.



Head Start, which is free for families who income qualify, was signed into law by President Linden B. Johnson as part of the ["Economic Opportunity Act of 1964"](#). Head Start was designed to disrupt intergenerational poverty and implemented to provide low-income children and their families with a pathway to success via education, health screenings, and nutritious meals. Head Start was designed with working families in mind, and the program provides wrap around supportive services for parents to help them achieve their own educational and career goals. Head Start serves children from birth to age 5 and is one of the country's most popular and impactful bipartisan initiatives. On August 7, 2026, the **U.S. Department of Health and Human Services (HHS)** proposed the largest overhaul of Head Start's longtime standards in the program's history, cutting the guidelines book from roughly 50,000 words down to about 3,600.

In comments released by the **National Head Start Association (NHSA)** in response to these new guidelines they state: "NHSA supports ACF's intent to reduce unnecessary burden on Head Start programs and educators. Yet, in its current form, the proposed rule goes too far in its deregulatory approach, and substantial changes are needed before a final rule can have a positive impact on children and families. The core problem facing most programs isn't a lack of flexibility, it's a lack of funding to keep pace with rising costs. Flat federal funding in an inflationary environment functions as a budget cut in practice. Continuing to ask programs to do more with less is unsustainable, and no amount of deregulatory flexibility substitutes for adequate appropriations." (The full response from NHSA is attached.)

[A recent story in The 19th](#) lays out a comprehensive explanation to the ways in which the proposed changes in the Trump administration's 153-page NPRM will negatively impact the Head Start program. In addition, **a one-pager** which clearly outlines the **national impacts** along with a document about the **local impacts** are also both attached for your reference.

"The proposed changes included in this NPRM will tear away these education and health services from the most vulnerable families in Santa Barbara County. Our county currently has the highest percentage of its population living in poverty out of all 58 counties in California, so there are many families and children who need the full, traditional set of care and education services that Head Start provides," said Patricia Keelean, CEO, CommUnify. "The consequences of these proposed changes will have a ripple effect not only on the children and families we serve who rely on this program, but also on the greater community."

Since 1967, CommUnify's Head Start program has served an estimated **55,000+ children**. Should this NPRM be passed in its current form, some of the negative impacts will include removal of important health and dental screenings for the children, an increased child-to-teacher ratio which may result in the children receiving less individualized attention from the teachers and, nationally, could present safety concerns, cutting bi-lingual education services, cutting services for children with disabilities, and a 66% reduction in the administrative funds allocated to help run the program. CommUnify recently released their ["Scissors" advocacy PSA](#) to inform the Santa Barbara County community about these proposed cuts.



CommUnify is asking the public for support in letting Congress know the importance of not implementing these onerous changes. Government leaders are required to review each and every comment prior to voting on the legislation. The link to submit a comment by **no later than October 6th** to the federal government is here: [Regulations.gov](#).

"The effects of this legislation on our families and community cannot be understated," said Jennifer Macdonald, Director of Children's Services for CommUnify. "Many of our parents work multiple jobs just to scrape by. A reduction in the quality of the complete, high-quality services Head Start provides may prevent these children from being kindergarten-ready and could result in them losing out on all the benefits education can provide. Head Start supports working families, which is good for our local economy. This NPRM will be bad for our county. We are reaching out to our community and asking you to make a comment on the federal register to tell the **Office of Management and Budget (OMB)** not to approve this NPRM.

"I have had four children enrolled in CommUnify's Head Start program, two of them right now. The 'whole person' care they provide my kids has been such a lifesaver. It gives me peace of mind knowing they are being well taken care of while I am at work, and gives them the tools they need to be ready for kindergarten and their futures."

~ Areli, Head Start parent

For a complete description of CommUnify's programs and services including Head Start, please visit www.CommUnifySB.org. Contact Joni Kelly at CommUnify at 805-886-1869 (cell) or email jkelly@CommUnifySB.org for more information about the proposed changes in the NPRM, to request high resolution images and B-roll, or to arrange an interview with Patricia Keelean, CEO, CommUnify.

#####



Executive Summary: NHSA Comments on the Head Start NPRM

Reducing Federal Burden for Head Start Programs (RIN 0970-AD30)

Where We Stand

Informed by input from thousands of Head Start stakeholders, gathered through webinars, association discussions, a national program leader workgroup, and a survey of more than 800 respondents, [NHSA's comments](#) respond to the NPRM section-by-section with detailed recommendations that reflect the real-world impact this proposal would have on Head Start programs, families, and, most importantly, children.

NHSA supports ACF's intent to reduce unnecessary burden on Head Start programs and educators. Yet, in its current form, the proposed rule goes too far in its deregulatory approach, and substantial changes are needed before a final rule can have a positive impact on children and families.

The core problem facing most programs isn't a lack of flexibility; it's a lack of funding to keep pace with rising costs. Flat federal funding in an inflationary environment functions as a budget cut in practice. Continuing to ask programs to do more with less is unsustainable, and no amount of deregulatory flexibility substitutes for adequate appropriations.

Three Commitments

Any final rule must meet all three to earn NHSA's support and keep the promise of Head Start:

1. **Don't make it harder for children and families with the greatest needs to access Head Start.** Any provision that makes access or enrollment harder moves the program away from its core purpose.
2. **Give programs of all sizes the resources they need to remain viable.** Rules that look like paperwork reduction on paper must not function as resource reduction in practice.
3. **Give programs meaningful flexibility, and don't undermine it through backdoor restrictions.** Flexibility granted in a regulation must not be quietly taken away through monitoring, grant negotiations, or allowable-cost decisions.

What We Support

NHSA supports several changes, including:

1. **Simplifying the Part 1303 facilities process:** The current facilities application and approval process has long created unnecessary delays for programs seeking to purchase, renovate, or construct facilities for children and families. We support ACF's efforts to streamline these requirements. This simplification is overdue.
2. **Streamlining the Head Start Preschool-to-Early Head Start conversion process:** We support efforts to simplify the process for converting enrollment slots between Head Start Preschool and Early Head Start and also urge greater timeliness in reviewing and approving such applications.
3. **Reduced prescriptiveness in recruitment and selection:** We support simplifying community needs assessment requirements and reducing procedural complexity in recruitment and selection processes.
4. **Background check simplification:** The proposal to replace the current Standards' detailed background check requirements with a general instruction to follow applicable federal and state statutes and regulations would continue to achieve the child safety objective while removing overlapping layers of regulation that add time and expense.

5. **Beginning to explore alternatives to CLASS as a punitive DRS trigger:** We support the proposed rule's move to step away from using CLASS as a trigger for DRS designation (which was never its intended purpose), and we look forward to working with ACF to develop a more appropriate accountability measure in its place.

Top Specific Changes We Request

We urge the Administration to reconsider these provisions in the final rule:

- **Reinstate national child-to-staff ratios and group size standards:** Deferring to state licensing abandons a national baseline that is more protective than the standards in most states. This change runs counter to research showing child-to-staff ratio is one of the strongest predictors of caregiving quality, responsive caregiving, and positive child outcomes.
- **Keep protections for children with the greatest need:** The rule strips detailed disability-services standards down to a general "follow applicable law" instruction, removes suspension and expulsion limits, and eliminates self-attestation for eligibility — impacting close to 1 in 10 currently enrolled children, disproportionately those experiencing homelessness or in crisis situations.
- **Keep comprehensive health, mental health, and developmental services:** The 45-day screening requirement, mental health consultation, and other core health standards would be eliminated — with ACF's own RIA attributing more than \$222 million in savings to reduced health and mental health staffing and services.
- **Remove English-only instruction:** A one-size-fits-all mandate that contradicts the Act's own requirements for supporting English learners and runs counter to decades of dual-language acquisition research. Hold programs accountable for English proficiency, but allow for flexibility in how programs reach those outcomes.
- **Reinstate the administrative cost cap reduction to 15%:** Available funds for critical oversight functions such as fiscal management, grant compliance, and even the staff person who oversees background checks would be sharply limited by capping costs at 5%, as the rule proposes. Currently, only about 3.7% of current grantees could meet this threshold today, and the Act itself sets 15% as the statutory ceiling.

Overarching Concerns

- **A national quality floor matters.** The cumulative effect of this rule falls hardest on children experiencing homelessness, children with disabilities, dual language learners, rural families, and children in license-exempt settings. Deferring to state law doesn't simplify Head Start's framework — it replaces one set of rules with a less consistent one (e.g., some states allow 2–3x the children per adult that Head Start currently permits).
- **The Regulatory Impact Analysis (RIA) counters the flexibility intent of the rule.** ACF projects \$2.2 billion in annual savings, driven overwhelmingly by larger class sizes, reduced staffing, and reduced services — not administrative simplification. This directly undercuts the claim that these changes are merely "optional."
- **Cost allowability must be guaranteed.** ACF must explicitly confirm that removing a particular Standard doesn't make the associated spending unallowable. Otherwise, programs won't be able to actually exercise the flexibility this proposed rule offers without risking that funding decisions get second-guessed later.
- **"It's in the Act" isn't a complete answer.** In several consequential areas (eligibility documentation, home-based services, disability services), the statute sets a general obligation while ACF's own regulatory text is what tells programs how to fulfill it. Removing that detail removes the only operational guidance that exists.
- **Reliable monitoring is missing.** The proposed rule doesn't specify how ACF will measure whether outcomes improve as flexibility expands, and several provisions (e.g., a vague new DRS "catch-all" measure) increase the risk of inconsistent, unpredictable oversight.

NHSA urges ACF to use these comments to substantially revise the final rule so that it keeps the promise of Head Start: access for the children and families who need it most, financial viability for programs of every size, and meaningful local flexibility, all built on a consistent foundation of quality and safety to give children and families an opportunity to succeed in school and in life.



Head Start

a CommUnify program

WHAT'S HAPPENING TO HEAD START?

A guide to the proposed federal changes

Head Start is a free federal program that has invested in the youngest Americans for more than 60 years, combining early education with health screenings, meals, disability services, and family support for children from birth to age 5. Head Start is one of the country's most popular and impactful bipartisan initiatives.

On August 7, 2026, the U.S. Department of Health and Human Services (HHS) proposed the largest overhaul of Head Start's standards in the program's history, cutting the rulebook from roughly 50,000 words down to about 3,600. The public has until **October 6, 2026** to weigh in at [regulations.gov](https://www.regulations.gov). *Nothing changes for families or programs today. Current standards stay in effect until a final rule is issued, likely months from now.*

WHAT THE PROPOSAL WOULD CHANGE

- **Bigger classes, fewer teachers per child.** Federal rules currently require 1 adult for every 4 toddlers. The proposal would replace that with each state's own (often looser) child care licensing rules. In California for example, that's up to 1 adult for every twelve 2-5 year olds, with 1.5 times the group size allowed.
- **Fewer health and developmental checks.** Programs would no longer be required to screen children for health, vision, hearing, or developmental delays within a set timeframe. Currently, the program requires hearing and vision screenings within the first 45 days of attendance. Early detection ensures correcting a problem so that there are no long-term health impacts.
- **Children could be suspended or expelled.** The current ban on expelling young children and strict limits on suspension would be lifted, leaving discipline policy up to each individual program. Removing the supports given to staff and families to support their child staying in school and building a positive foundational experience of school.
- **Harder for families to prove they qualify.** Families could no longer simply state that they are homeless or verify a child's age themselves without added documentation. HHS's own estimate suggests roughly 8% of currently enrolled children could lose their spot.
- **Parents would have less say.** Parent committees, currently required, would become optional. Parents are often a key part of the board. Now, there would no longer be a guaranteed process for resolving disagreements between parents and program leadership.
- **Less funding for oversight and accountability.** The cap on administrative spending (financial oversight, compliance, leadership) would drop from 15% to 5% of a program's budget — a bar fewer than 4% of programs nationally currently meet.
- **English-only instruction required.** Programs would be required to teach only in English, with an exception for Tribal programs preserving Native languages, removing existing support for children and families who speak other languages at home.
- **Less support for infants, toddlers, and new parents.** Requirements for home-visiting caseloads, visit length, and staff qualifications in the Early Head Start model would loosen, along with timely-care requirements for new mothers and newborns.
- **A few things would be added.** The proposal does add new nutrition standards and requires at least 30 minutes of physical activity for every 3.5 hours of programming.
- **No new money attached.** The administration says these changes could free up \$2.2 billion a year and serve up to 236,000 more children but that's mostly projected savings from fewer staff, larger classes, and fewer services, not new federal funding for Head Start.

HOW TO WEIGH IN

Public comments can be submitted at [regulations.gov](https://www.regulations.gov) through **October 6, 2026**. Comments carry the most weight when they include specific, local detail about how current ratios, screenings, and family support translate into real outcomes for children, and what would change if those requirements went away.



CommUnify's Head Start and Early Head Start: The Local Impact of Proposed Rule Changes

The beauty of Head Start and Early Head Start lies in their multigenerational approach, which supports both children and their families. Programs work directly with families to provide comprehensive services, including parent education classes, leadership opportunities, and family support, while delivering high-quality early care and education. These services extend beyond education to include health and dental services, developmental screenings, nutritious meals, mental health services, and much more. This comprehensive approach is designed to interrupt generational poverty by creating opportunities for children and families to build a stronger, more stable future.

Staff are supported through career development and ongoing professional development opportunities that align with program goals and areas identified through self-assessments and evaluations. Data-informed decision-making is at the heart of continuous program improvement, ensuring that the voices of families, staff, and community partners are encouraged, welcomed, and incorporated into the ongoing development of the program.

The Impact on Children and Families

Access to High-Quality Early Care and Education

Last year, more than 500 children and their families had access to 1,380 hours of care through our program, allowing parents to maintain employment, participate in job or vocational training, attend school, and seek employment. The current Notice of Proposed Rule Making (NPRM) proposes reducing the duration of the Head Start and Early Head Start programs from full day offerings to 3 hours per child. Reductions in program duration would negatively impact families' ability to meet work, see work, or attend school, and could create additional challenges for local employers who depend on access to a stable workforce.

Also, the current NPRM proposes changes to the ratio of children to teachers, increasing the number of infants, toddlers, or preschoolers each teacher will be assigned. This will result in less individual attention for the children, and more strain on the teachers, especially because of the shortened day. (There will be separate morning and afternoon sessions with different children in what is currently now a full-day session with one group of children.)

Supporting Dual Language Learners and Family Engagement

Last year, a large percentage of children were identified as dual language learners. The current NPRM proposes that Head Start and Early Head Start become English-only programs. Providing English-only materials for families and children does not adequately support the needs of our local community, nor does it serve the best interest of the child who may not be comfortable in English when initially enrolled and could slow down the child's progress.

It is crucial that children and parents feel safe, understand the information provided to them, and feel welcomed in our programs. We accomplish this by employing multilingual staff who can communicate with families in their home languages. High-quality early care and education depend on strong relationships and meaningful partnerships with families. Communication in a family's home language is essential to building trust, ensuring parents understand program expectations, and allowing children to express their needs while at school.

Protecting Children's Oral Health

Last year, over 500 children received dental screenings within the first 45 days of enrollment. Of those children, 168 were identified as needing treatment, and 153 received treatment during the school year, free of charge.

Maintaining established screening timelines ensures that children receive early intervention and that their oral health needs are addressed promptly. When children receive the care they need, they are better able to focus on learning and participating in the classroom. Delays in screenings and follow-up services could leave children with unmet health needs that interfere with their development and learning. Because many of our parents work full-time, it may be difficult for them to take time off from work, without sacrificing pay, to take their children to the dentist. Head Start and Early Head Start provide a free and easy way for enrolled families to ensure their children's dental health.

Supporting Families Experiencing Homelessness

Last year, we served 130 families who were categorized as homeless. The current NPRM will no longer permit families to declare housing status ("self-attestation") without providing proof, which may be hard for them to do if they are housing-unstable. Removing self-attestation as an option for establishing eligibility could negatively impact these families' ability to qualify for services, particularly survivors of domestic violence and their children, who may face additional barriers to documenting their circumstances.

Children need a stable, safe, and loving environment to grow and thrive, especially when their housing situation is uncertain. Our programs provide that environment, along with three nutritious meals each day. Maintaining accessible eligibility pathways is essential to ensuring that vulnerable families can continue to receive the comprehensive support they need.

Ensuring Timely Disability Screening and Services

Through established 45-day screening timelines, 54 children received referrals for assessments and obtained an Individualized Education Program (IEP) or an Individualized Family Service Plan (IFSP) to access additional services.

Disability services could be negatively impacted by the proposed rule changes through potential delays in screenings and reduced support for families navigating the referral and assessment process. Families, many of whom are not native English speakers, may rely on staff to help them understand the IEP process, access appropriate services with outside providers, and develop the skills and confidence to advocate for their children's educational needs.

Timely identification and intervention are essential to ensuring that children with disabilities receive the individualized support they need to thrive.

The Impact on Staff and Program Quality

Our staff survey indicated that employees are deeply mission-driven, child-centered, and strongly connected to serving children and families. At the same time, staff reported experiencing significant strain from:

- Staffing shortages
- Burnout
- Inconsistent leadership support
- Behavioral challenges in classrooms
- Workload and paperwork demands
- Compensation concerns

Despite these stressors, staff continue to demonstrate remarkably high emotional commitment to the work itself. Their dedication is a tremendous asset to our program, but that commitment must be supported by the resources and working conditions necessary to sustain it.

As I consider the implications of the Notice of Proposed Rule, I am deeply concerned about the cumulative impact of proposed changes to child-to-adult ratios, program duration, caseload limits, screening timelines, and administrative funding caps.

Changes that increase workloads, reduce access to professional development and coaching, limit disability support, or reduce the time staff can dedicate to direct services could further strain an already stretched workforce. Removing caseload caps and extending screening timelines could also reduce the individualized attention and timely support that families depend on.

Increasing workloads without providing corresponding increases in compensation and support would negatively impact program quality, service delivery, and the overall well-being of staff, families, and children.

Staff need to be well to support children and families effectively. To achieve this, they need manageable caseloads and workloads, access to support services, ongoing professional development, coaching, and compensation that provides a living wage.

Removing professional development support and requirements would negatively impact children, families, and children. Staff need up to date training and coaching on current best practices and how to best serve the population of children in their classrooms. Removing incentive support for higher education and professional development could have negative implications across all program delivery.

Conclusion

Head Start and Early Head Start are more than early childhood education programs. They are comprehensive, multigenerational systems of support that strengthen families, promote children's development, create pathways out of poverty, and contribute to the economic stability of our communities.

The proposed changes raise significant concerns about our ability to maintain the quality, accessibility, and comprehensive services that children, families, and communities depend on.

Protecting the integrity of Head Start and Early Head Start means protecting the children, families, and dedicated staff who make these programs possible. Sustainable, high-quality services require policies that recognize the interconnected needs of children, families, and staff and provide the resources necessary to support them.

From: [Missy Zeitsoff](#)
To: [Santa Barbara City Council](#); [Kelly R. McAdoo](#)
Cc: [John Doimas](#); [Dan Hentschke](#); banderson@santabarbaraca.gov
Subject: Re: Wendy is Wrong!! Today was my Annual Inspection! Timely! I AM A GRATEFUL SECTION 8 RECIPIENT. EXEMPT ME!!
Date: Wednesday, September 30, 2026 11:55:27 AM

Today I have a plumber to fix my minor issue that the HA HABITABILITY INSPECTOR observed YESTERDAY and required to be fixed. A Tiny Drip from my kitchen sink faucet. ONE DAY from Inspection to FIX. This demonstrates the great cooperative partners that make Exemption from the RSO one of the many stated advantages to Section 8 and deed restricted affordable housing renters. We heard from Mr. Rob Fredericks, Director of the SBCHA for the Agenda Item for the RSO. Superior attention to detail of any kind of habitability issue is immediate. A tenant just tells the owner AND SBCHA about any problem. This attention and collaboration between my apartment owner (not my LANDLORD - BAD TITLE) , HA, and me, proves there is a great system of protecting both owner and tenant. Owner pays for water. We want water conservation. Drip is annoying. And even tiny problems are quickly mitigated . So , there is a mutual benefit. Thank you for the Exemption. I hope this example modified the worry of Councilpersons WS and OG. This Exemption is GOOD for all of us who receive rental financial help. Mr. Rodgers is right. Find THE HELPERS. APOLOGIES ARE DUE TO MR. FREDERICKS et al. I cringed, and still tears are coming to my eyes today, thinking of the unfair comments to RF yesterday. Did it occur to some people that the negative complaints that were spoken about NEGATIVE HABITABILITY by the renters were untrue? Best to All the Helpers. Missy

On Tue, Sep 29, 2026, 5:46 PM Missy Zeitsoff <missyzeitsoff@gmail.com> wrote:

HA sent an inspector. My drips from faucet in kitchen sink was noted. I already --SAME DAY --have emails from both Housing Authority to fix it by October 27 with a follow-up inspection of the repaired drip. And. Owner was notified. TO FIX IT. PAY TO FIX IT . THIS IS INCREDIBLE! ALL IN ONE DAY. OWNER IS CONTACTING GOOD LAND PLUMBER TO FIX.

From: [Christina Humphrey](#)
To: [City Clerk](#)
Subject: FW: Public Comment – September 15, 2026 – Short-Term Rental Ordinance / High Fire Hazard Areas
Date: Tuesday, September 29, 2026 11:37:46 AM
Attachments: [2026-letter-Short Term Rental modification.pdf](#)

Some people who received this message don't often get email from christina@chumphreylaw.com. [Learn why this is important](#)

Dear City Clerk –

My understanding is that the September 15, 2026, hearing was continued to early October. I am re-submitting the letter to ensure it is part of the public record for this agenda. Please ensure delivery to the Mayor and members of the City Council accordingly.

Thank you,
Christina Humphrey

From: Christina Humphrey
Sent: Saturday, September 12, 2026 9:21 AM
To: clerk@SantaBarbaraCA.gov
Subject: Public Comment – September 15, 2026 – Short-Term Rental Ordinance / High Fire Hazard Areas

Dear City Clerk,

Attached please find my letter regarding the proposed Short-Term Rental Ordinance scheduled for consideration by the City Council on September 15, 2026. My comments specifically address the proposed prohibition on owner-occupied homeshares in High Fire Hazard Areas and suggest a more tailored alternative.

Please include the attached letter in the public record for this agenda item and distribute it to the Mayor and members of the City Council.

Thank you for your assistance.

Best regards,
Christina Humphrey

To: Santa Barbara City Council
From: A Constituent of Santa Barbara
September 25, 2026 for October 6, 2026 meeting

Subject: ShortTerm Rentals (STR) and Home STAYS/Homeshare

I strongly oppose the STR where out of town or in town investors buy up houses where the sole purpose is to operate vacation rentals for their personal financial gain. This makes absolutely NO sense since Santa Barbara has had and continues to have a serious housing shortage with NO end in sight, leaving locals with limited options to buy or rent homes.

However, I am strongly in favor of the City of Santa Barbara allowing HOME STAYS/HOMESHARE where the host lives in the home and is present in the home during the entire stay of guests. Usually it's only one bedroom and a bathroom that's available for travelers near and far.

Santa Barbara is such a desirable destination. Unfortunately, many travelers cannot afford the high costs of our hotels. The Home Stays provide an affordable and excellent way for travelers to visit Santa Barbara. Sometimes people even need to come for medical appointments. A Home Stay provide perfect options.

Whenever, I've traveled, especially internationally, my preference was staying in a Home Stay. Not just because it's more affordable but because it's wonderful to meet helpful locals who can offer suggestions on dining, local attractions, etc. It's always a wonderful cultural experience and even potential friendships can happen.

I hope our city will allow Home Stays/HOMESHARE for travelers. It's a win win experience for our hosts, travelers and our city. What could be better?

September 12, 2026

Via Email

Mayor Randy Rowse and Members of the Santa Barbara City Council
City of Santa Barbara
735 Anacapa Street
Santa Barbara, California 93101

Email: Clerk@SantaBarbaraCA.gov

Dear Mayor Rowse and Members of the City Council:

I am writing regarding the proposed Short-Term Rental Ordinance scheduled for consideration on September 15, 2026, and specifically the provision that would categorically prohibit both short-term rentals and owner-occupied homeshares in all designated High Fire Hazard Areas.

I am a Santa Barbara homeowner and local civil litigation attorney, and I have practiced law for 25 years. My practice has included drafting and working with regulations at the state level, as well as addressing issues of statutory and regulatory interpretation on appeal. I also live in a High Fire Hazard Area. I take the City's wildfire and evacuation concerns seriously; my neighbors and I live with those risks and are actively investing in fire hardening and emergency preparedness.

I respectfully suggest that the Council reconsider the categorical prohibition as applied to **owner-occupied homeshares** and instead permit them subject to appropriate wildfire-safety requirements. This would not only preserve the City's public-safety objectives, but could create a meaningful financial incentive for homeowners to undertake fire-hardening measures sooner.

Homeowners in High Fire Hazard Areas are being asked—and in many cases are choosing—to make substantial investments in defensible space, vegetation management, home hardening, and emergency preparedness, while at the same time facing significantly increased insurance costs associated with living in these areas. Those improvements can require substantial up-front expenditures and maintenance costs. A carefully regulated owner-occupied homeshare provides a homeowner with a means of generating supplemental income to help offset those costs while continuing to live in and care for the property.

The City therefore has an opportunity to align the economic incentive with its public-safety objective: permit an owner-occupied homeshare where the homeowner demonstrates appropriate wildfire preparedness and compliance with applicable safety requirements. Rather than making additional hardening irrelevant to eligibility, the ordinance could give homeowners another reason to make those investments sooner. The homeowner seeking the economic benefit of a homeshare could also bear the reasonable incremental cost of any additional City or Fire Department review required to establish compliance.

This is particularly appropriate for a homeshare because it does not involve converting the residence into an absentee vacation rental. The homeowner continues to reside at the property and, under the proposed ordinance, must be physically present overnight. Thus, a limited homeshare can provide supplemental income to help fund the increased costs of living safely in a High Fire Hazard Area **without removing the homeowner from the residence or converting the property to a full-time transient use.**

I therefore suggest a relatively modest modification to the proposed ordinance:

High Fire Hazard Areas. Short-Term Rentals are prohibited within a High Fire Hazard Area. An owner-occupied Homeshare shall be eligible for a Homeshare License if the property is in compliance with the wildfire-safety, defensible-space, vegetation-management, and emergency-access requirements applicable to the property under Chapter 8.04 of this Code and the City of Santa Barbara Fire Code, and any additional objective wildfire-safety requirements adopted by the City and made generally applicable to owner-occupied Homeshares within the applicable High Fire Hazard Area or zone.

The City may require review or inspection by the Fire Department or Fire Code Official to verify compliance with such requirements. To the extent practicable, such review shall be coordinated with existing City wildfire inspection and preparedness programs. The applicant may be required to pay a reasonable fee limited to the City's incremental cost of any additional review required for the Homeshare License.

A Homeshare License shall not be denied based solely upon the property's location within a High Fire Hazard Area unless the Fire Code Official determines, based upon conditions specific to the property, that operation of the Homeshare would present a material fire-safety or evacuation risk that cannot reasonably be mitigated through conditions of approval.

This approach would not require the City to approve every property in a High Fire Hazard Area. If a property's access, evacuation conditions, vegetation, structure, or other characteristics present risks that cannot reasonably be mitigated, the City could deny the license. It would simply allow the City to distinguish between properties that can safely accommodate a small, owner-occupied homeshare and those that cannot.

Owner-Occupied Homeshares Are Different From Absentee Vacation Rentals

The proposed ordinance itself recognizes a meaningful distinction between a short-term rental and a homeshare. A homeshare involves the rental of a portion of the owner's or host's primary residence while the owner or host continues to reside there. The ordinance further requires the owner or host to be physically present in the residence between 10:00 p.m. and 7:00 a.m. while it is rented and limits a homeshare to four rental guests overnight.

Those circumstances are materially different from an absentee whole-house vacation rental.

I understand that one concern identified during the ordinance process is that transient visitors may be unfamiliar with evacuation routes. But in an owner-occupied homeshare, the permanent

resident—the person familiar with the property, neighborhood, and evacuation procedures—is required to remain at the residence overnight. The City could also require guests to receive evacuation information and impose any additional conditions the Fire Department considers appropriate.

The distinction is relevant to the City's housing objectives as well. An owner-occupied homeshare does not necessarily remove a residential unit from the long-term housing supply: the homeowner continues to occupy the residence and rents only a portion of the home. Treating such a use identically to an absentee whole-house vacation rental therefore overlooks differences relevant both to wildfire safety and to the City's housing objectives.

Our Neighborhood Is Already Investing in Wildfire Preparedness

Our neighborhood's experience also demonstrates why a categorical rule may be unnecessarily broad. Residents are organizing neighborhood preparedness "pods," developing designated buddy systems, committing to additional fire-hardening measures, coordinating emergency planning, and working closely with the Santa Barbara Fire Department.

Yet under a categorical prohibition, none of these measures can be considered. A homeowner who has invested substantially in defensible space, fire hardening, evacuation preparedness, and neighborhood coordination is treated the same as a property presenting materially different access, vegetation, structural, or evacuation conditions. The City should encourage these private investments in wildfire resilience, and regulated homeshare eligibility could provide an additional incentive to undertake them sooner.

The Proposal Need Not Create an Unfunded City Program

This approach need not require taxpayers to subsidize an additional regulatory program. Where feasible, review could be incorporated into existing City wildfire inspection and preparedness programs and the STR/homeshare licensing process, with the applicant bearing the reasonable incremental cost of any additional review. The City could retain authority to require additional inspection following a material change in property conditions or a safety-related violation.

The 30-Day Distinction Further Supports Regulation of the Actual Risk

The ordinance's treatment of longer-term rentals also illustrates why a more tailored approach is appropriate. The proposed ordinance regulates rentals of 30 consecutive days or less, while a bona fide residential rental to the same occupant for 31 days or longer falls outside the STR prohibition.

I understand that the concerns identified during the ordinance process include both visitors' unfamiliarity with limited evacuation routes and their behavior with flammable materials. Those are legitimate concerns, but they are also risks that an owner-occupied homeshare is particularly well suited to mitigate. Unlike an absentee STR, the homeowner remains at the property, is familiar with local evacuation procedures and current fire conditions, and can communicate applicable fire-safety restrictions to guests and monitor activity at the property.

The risk associated with flammable materials is also not unique to short-term occupancy. Residents, long-term tenants, houseguests, and short-term visitors can all engage in conduct that creates ignition risk. In an owner-occupied homeshare, however, the homeowner is present to communicate applicable restrictions and monitor activity at the property.

The 30-day distinction reinforces this point. The physical characteristics of the residence, its access and evacuation routes, and its wildfire preparedness do not change on day 31. Nor does a longer-term occupant necessarily become familiar with evacuation conditions immediately upon beginning a tenancy. In an owner-occupied homeshare, by contrast, the permanent resident familiar with the property and neighborhood remains on site.

The question, therefore, is not whether homeshares in High Fire Hazard Areas should be regulated. They should be. The question is whether the identified risks can be addressed directly through objective safety requirements and owner oversight rather than conclusively presumed based solely on the property's location and the duration of a guest's stay.

Conclusion

Those of us who live in Santa Barbara's High Fire Hazard Areas have a substantial interest in making our homes and neighborhoods safer. We live with the wildfire risk, face increasing insurance and mitigation costs, and are investing our own resources in fire hardening, defensible space, and emergency preparedness.

I am not asking the City to relax its fire-safety standards. I am suggesting that the City use the homeshare licensing process to reinforce them. A homeowner seeking the privilege of operating a homeshare in a High Fire Hazard Area can reasonably be required to satisfy heightened, objective wildfire-safety requirements and bear the reasonable incremental cost of demonstrating compliance. In return, a homeowner whose property can safely accommodate a small, owner-occupied homeshare should have an opportunity to qualify.

I respectfully ask the Council to consider this modification before adopting a categorical prohibition on owner-occupied homeshares in High Fire Hazard Areas. This approach would protect the City's public-safety interests while encouraging additional private investment in the very fire-hardening and preparedness measures the City seeks to promote. I would be happy to work with City staff or other interested residents on appropriate language.

Thank you for your consideration.

Respectfully,

Christina Humphrey