

# **Item 16 –County Permitting of Short-Term Rentals and Considerations of Associated Water Use**

August 20, 2025

BCPUD Regular Meeting of the Board of Directors

Presented by G. Woods

## What I would like to accomplish here...

- *Review information related to County of Marin's Short Term Rental Program and its implications on water used and LWUPs.*
- *Review some Water Use Data in the District, which I've compiled here.*
- *This is dense, complicated information!*
- *Sit on this information until at least next meeting.*
- *In the meantime, let me know if there are any further analyses or questions you'd like me to research.*
- *At a future meeting, Board to consider if you want to modify District Policy in order to better align or interface with the County Program.*
- *At this time, Staff does not feel that there is any urgency to modify any existing District LWUP policy to accommodate the program.*

At BCPUD's May meeting we began a discussion of County Permitting of Short-Term Rentals and Consideration of Water Use

*A reminder of that Discussion...*

# **Item 5. County of Marin's Short Term Rental Permit Program - Implications on Water Used and BCPUD Operations**

5/21/2025

Regular Meeting of BCPUD Board of Directors

# Short Term Rentals



## STR Regulations as Certified by the California Coastal Commission

### 5.41 SHORT TERM RENTAL LICENSE REQUIREMENTS

#### 5.41.010 Purpose of Chapter.

This Chapter establishes standards that regulate short term rentals. This Chapter is enacted to reduce the negative impacts of short term rental activity, assure the health and safety of residents and visitors, preserve existing housing and communities while balancing the protection of private property rights, provide economic opportunities for Marin County residents, and provide visitor serving accommodations for coastal tourists.

This Chapter is administered by the Marin County Community Development Agency.

- The county of Marin Recently Instituted a Short-Term Rental Licensing Program.
- Entire Chapter on this STR licensing program can be found here: [ORDINANCE NO. \\_\\_\\_\\_\\_](#)

Township	Initial Number of Short Term Rentals	Ultimate Number of Short Term Rentals
Bolinas	63	54
Dillon Beach	125	204
Fallon	3	3
Forest Knolls	8	8
Inverness	93	86
Lagunitas	6	4
Marshall	28	27
Muir Beach	20	19
Muir Woods Park	19	19
Nicasio	11	8
Olema	3	3
Petaluma	2	2
Point Reyes Station	32	26
San Geronimo	10	7
Stinson Beach	192	192
Tomales	12	11
Valley Ford	1	1
Woodacre	12	8

There are currently 60 BCPUD customers registered as "securing" STR spots with the County; BCPUD staff found a total ~40 BCPUD customers with STRs listed on AirBnB, VRBO, etc.

The "Initial Number of Short Term Rentals" referenced above establishes the number of licenses available for issuance for the valid applications submitted before July 1, 2025 (first round licenses).

First round licenses may be renewed. However, subsequent to these first round licenses being issued, the number of new licenses being issued shall decrease to the "Ultimate Number of Short Term Rentals" established above. The cap on the ultimate number of short term rental licenses in each township shall be eventually achieved as license applications or renewals decline over time.

# How does County's STR Permitting Implicate Water Use and BCPUD Operations?

**4. Application Materials.** No short term rental license or renewal shall be issued unless the application has first been deemed complete. The administrative procedures shall specify all the information necessary for a complete application, including, but not necessarily limited to, the following:

- i. The name(s) and contact information for all property owners. If the property owner(s) applying for the license own/s less than a 100% fee interest in the

license or license renewal application.

- xiv. All short term rental applicants with properties served by a local water provider must provide water use bills or some other documentation from the water provider if volume based bills are not available. If the water use documentation demonstrates short term rental water use exceeding an average of 250 gallons per day, or a lower limit established by the local water provider, the short term rental license or license renewal application shall include strategies to reduce water use to below an average of 250 gallons per day during the next year. If water use is not reduced as required, the license shall not be subsequently renewed.

**5. Public Notification.** Within five days after issuance of a short term rental license the Community Development Agency will provide written notification

- 250 gallons/day works out to 33.4 Cu. Ft/day or ~3000 Cu. Ft/Quarter
- A standard Limited Water Use Permit (LWUP) in Bolinas is 2700 Cu. Ft/Quarter



BCPUD is receiving notices in the mail from Marin County Planning Division:

## Notice of Short Term Rental Authorization

The Marin County Planning Division has issued a Short Term Rental (STR) License for a Non-Hosted] STR located at [REDACTED], Bolinas. The purpose of this notice is to provide neighbors with information about the STR should any issues arise.

**Short Term Rental Address:** [REDACTED]

**Short Term Rental APN(s):** [REDACTED]

**Short Term Rental License Number:** P4814

**Local Contact Person or Host:** [REDACTED]

**Local Contact Person or Host Phone Number:** [REDACTED]

**Local Contact Person or Host Email:** [REDACTED]

More information about the County's Short Term Rental Program is available online at <https://www.marincounty.gov/cda> or scan the QR Code provided.



- BCPUD office is also starting to receive emails and phone calls from customers asking us to share their water use data, so that they can in turn share this info directly with the County



At the end of that discussion, I said that I would address the following questions at a later meeting:

- *Do the 40 active STRs use less or more water than average residential customers?*
- *How many of the 60 registered STRs already have an LWUP?*
- *How often would water use for registered STR be above 2700 cu.ft/qt?*
- *How often would water use for registered STR be above the ~3000 cu.ft/qt?*
- *Any other analyses you would like staff to undertake to help in your decision-making process?*

- So here are answers to some of those questions...

## Existing LWUPs in the District

	Values
# of Registered STRs	60
# of Registered STRs with Existing LWUP	15
% of Registered STRs with Existing LWUP	25%
# of total "meter-read" connections	578
# of Existing LWUP meters in District	128
% of Existing LWUP Meters in District	22%
# of Additional LWUPs if all Registered STRs were added	45
% of LWUPs in District if we added these Registered STRs to LWUPs	30%
% of ALL Existing LWUPs that are above 2700 Cu. Ft./Qt	61%
% of ALL Existing LWUPs that are above 3000 Cu. Ft./Qt	49%
% of Registered STRs with LWUP above 2700 Cub. Ft./Qt	69%
% of Registered STRs with LWUP above 3000 Cub. Ft./Qt	63%

- Meter Reading is conducted manually in the District.
- When an LWUP customer goes over their allowance, repeated reads are required to get LWUP customers in compliance.
- Instituting LWUPs requires administrative time for the district to enforce.
- While many (25%) of Registered STRs already have LWUPs, 63% of those LWUPs are above the 3000 Cu. Ft./Qt permitted by the County (69% are above the BCPUD's current standard of 2700 Cu.Ft/Q).
- The more restrictive the LWUP, the more likely the customer is to go over their allowance, and the more time consuming administering the allowance is for the District.

# Water-Use Data Methodology

- We examined Customer Water Use data for 2023 and 2024
- We filtered-out “multi-residential” and commercial customers
- We identified customers who have an STR listed on Airbnb and/or VRBO → we considered these as “ACTIVE STRs”
- We identified customers who are currently Registered with the County → “Registered STR”
- We filtered out customers where there was 0 cu/ft/qt water used 2 quarters in a row

	<b>Active STR</b>	<b>Registered STR</b>	<b>Non-STR</b>
<b>Total Number Pre-Filter</b>	40	60	473
<b>Number Residential Customers Filtered due to two 0s in a row</b>	1	2	21
<b>% Filtered</b>	2.5%	3.3%	4.4%

- Filtering of data was done to compare apples to apples and ensure that we were looking at homes that are actively occupied → “Filtered”
- This filtering of data did not appear to introduce any major biases into the categories
- We identified customers as “Registered STR”, but who are not “ACTIVE STR” → as “Registered Only” (we excluded “Registered Only” from our subsequent Quarterly Water Use analysis—see later slides)

# Example Data

- Standard LWUP in the District is 2700 Cu. Ft /Quarter
- County STR permitting requires water be under 3000 Cu.Ft/ Quarter
- Here's an example of what that data looked like for 9 Active STR customers:
- We identified customers that went over 2700 or 3000 cub. Ft. /quarter

STR Registered with County	STR confirmed Online	LWUP Maximum Quarterly Allowance	Spring/Q2 2023	Summer/Q3 2023	Fall/Q4 2023	Winter/Q1 2024	Spring/Q2 2024	Summer/Q3 2024	Fall/Q4 2024	Winter/Q1 2025
YES	YES		1100	1900	2400	1700	1900	2100	2900	900
YES	YES		500	1300	1800	700	600	1300	1200	300
YES	YES		100	400	300	200	200	400	400	100
YES	YES		1200	800	1200	100	600	800	1100	500
YES	YES		700	1100	1300	1000	1200	1300	1300	500
YES	YES		300	900	1100	600	600	700	900	400
YES	YES		1900	2800	3400	2700	3200	2500	2500	1700
YES	YES		600	1900	2200	2100	1300	600	1400	700
YES	YES		500	1500	2400	1800	1100	2100	2300	900

We looked over the 2-year period and identified: customers from the filtered data set:

“Below LWUP” Customer → water use was below 2700 Cu. Ft/Q for all Quarters

“BCPUD only LWUP” Customers → any quarter where water use was >2700 and <3000 but no quarter >3000

“County LWUP” Customer → any quarter where water use was >3000  
or over 3000 Cu. Ft/Q in one or more quarters

## Water Use Above LWUP Cutoffs

LWUP considerations at <u>ACTIVE STRs</u>			
Category	Water Use	Amount	Percent
Below LWUP	<2700	24	62%
BCPUD only LWUP	>2700>3000	1	3%
COUNTY LWUP	>3000	14	36%
	Total	39	100%

**39%** of Active STRs would be expected to exceed the "standard" [2700 cu. ft/Q] BCPUD LWUP over a 2-year Period

LWUP considerations at Registered but <u>NON-Active STRs</u>			
Category	Water Use	Amount	Percent
Below LWUP	<2700	14	74%
BCPUD only LWUP	>2700>3000	2	11%
COUNTY LWUP	>3000	3	16%
	Total	19	100%

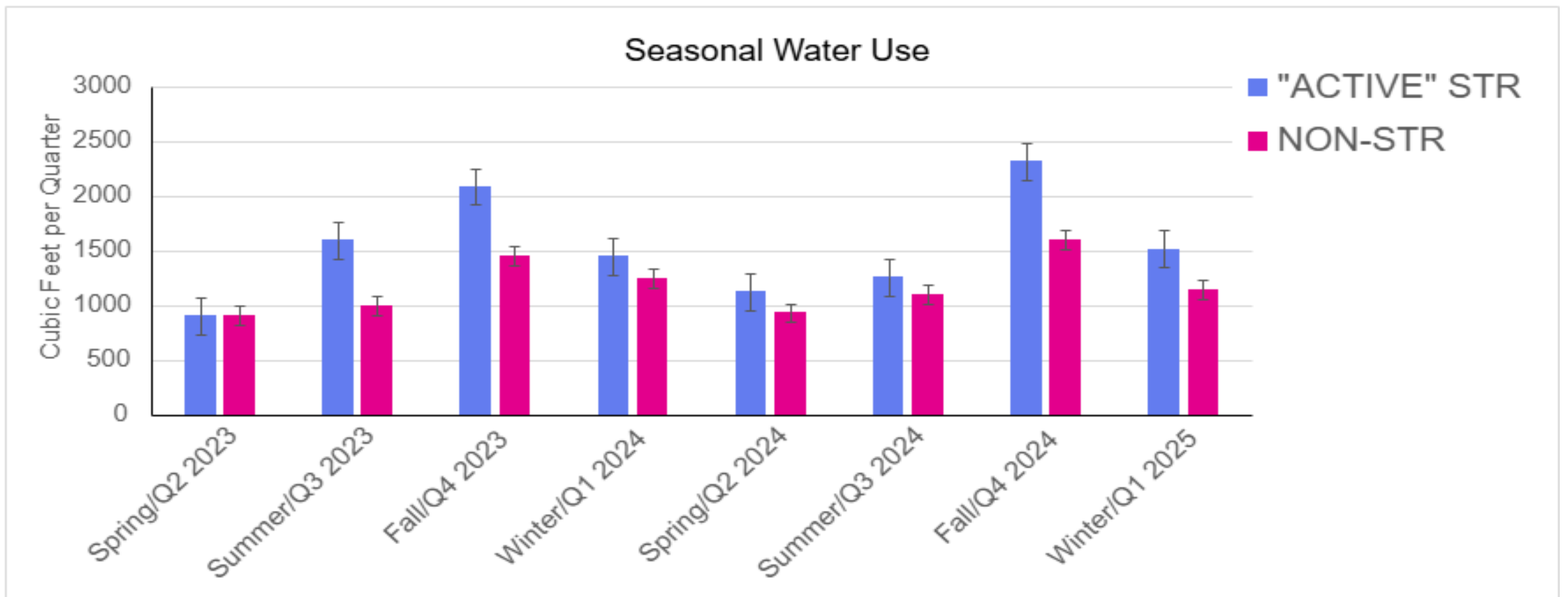
**27%** of Registered not yet Active STRs would be expected to exceed the "standard" BCPUD LWUP over a 2-year Period

LWUP considerations at <u>NON-STRs</u>			
Category	Water Use	Amount	Percent
Below LWUP	<2700	335	74%
BCPUD only LWUP	>2700>3000	16	4%
COUNTY LWUP	>3000	101	22%
	Total	452	100%

**26%** of remaining residential homes would be expected to exceed the "standard" BCPUD LWUP over a 2-year Period

# Seasonal Water Use at Active STRs vs. Non-STRs

- We examined Customer Seasonal Water Use data for 2023 and 2024
- It appears that Active STRs use significantly more water than Non-STRs, particularly in the Fall Quarter when creek flows are low



Average Use	Spring/Q2 2023	Summer/Q3 2023	Fall/Q4 2023	Winter/Q1 2024	Spring/Q2 2024	Summer/Q3 2024	Fall/Q4 2024	Winter/Q1 2025
"ACTIVE" STR	907.69	1602.56	2092.31	1453.85	1128.21	1264.10	2323.08	1523.08
NON-STR	919.39	1002.61	1457.52	1254.68	935.56	1099.56	1607.19	1151.63
Std error								
"ACTIVE" STR	99.82	285.85	237.50	175.74	124.66	141.45	307.94	284.05
Non-STR	40.24	40.93	63.20	67.11	47.21	48.88	65.23	67.58
p-Value	0.934	0.0002	0.005	0.398	0.246	0.340	0.003	0.131

END