



October 13, 2022

VIA U.S. MAIL AND EMAIL

California Coastal Commission
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**Re: Half Moon Bay Local Coastal Program (LCP)
Amendment LCP-2-HMB-21-0078-2**

Dear Commissioners of the California Coastal Commission,

The City of Half Moon Bay seeks to amend its Local Coastal Program (“LCP”) through Amendment LCP-2-HMB-21-0078-2 (the “Half Moon Bay Amendment”). The Half Moon Bay Amendment proposes common-sense short-term rental (“STR”) regulations that preserve housing for local residents while also fostering affordable tourist accommodations and coastal access. In this case, the subject city provides a wealth of existing tourist accommodations, which makes the provision of expensive, unhosted STRs unnecessary and potentially threatening to the existing housing stock and existing legitimate, lower-costs accommodations. Better Neighbors LA (BNLA) and Unite HERE Local 11 (“Local 11”) support the Half Moon Bay Amendment and recommend the Coastal Commission accept it without modification.

BNLA is an advocacy organization which monitors the regulation of STRs throughout California. Our organization also operates a public hotline through which we learn of the impact of STRs on local communities. Local 11 represents 30,000 hotel and airport workers across Southern California and Arizona.

BNLA and Local 11 have partnered to express their unified support for STR regulations which strike a balance between protecting local housing stock and communities while also providing affordable access to the coastal zone. It is our position that the best way to accommodate these interests is to require STRs to be hosted.

Hosting requirements are an important aspect of STR regulations. STR hosting requirements create sustainable affordable accommodations for tourists while preserving residential areas, improving safety, and protecting housing. In addition, STRs supervised through on-site hosts avoid increases in local nuisance and crime which are often reported at unsupervised rentals.

Host requirements are one of the only tools available to the Coastal Commission to ensure that tourist accommodations in the coastal zone remain affordable. Hosted STRs are consistently the most affordable STRs. Together, BNLA and Local 11 have supported hosting requirements in Malibu, Long Beach and Dana Point. Indeed, the Coastal Commission has itself historically endorsed on-site supervision of STRs and suggested municipalities consider adopting them. The reason is because unhosted STRs tend to draw investors and commercial operators that charge much more than genuine home-shares. In several cases, including Laguna Beach and most recently, in Malibu, we have provided data that demonstrates that unhosted STRs are some of the most expensive accommodations, reserved for only the wealthiest travelers. Hosted STRs, however, are operated by local residents, are more welcoming of families, and cost much less than unsupervised stays.

The staff report makes no mention of the fact that Half Moon Bay has a wealth of existing tourist accommodations by which to allow coastal access to visitors. There are an estimated 897 hotel rooms and campsites in Half Moon Bay, and a total of about 4,682 housing units overall. Tourist accommodations, therefore, even without STRs, represent a full 20% of all residences. This density of tourist accommodations is much more generous than other coastal cities. For example, Long Beach's tourist accommodations represents 7.6% of all housing units; tourist accommodations in Malibu represent 4.5% of its residential housing; and tourist accommodations in Laguna Beach are 10% of its housing units. Half Moon Bay has established tourist accommodations at more than double the rate of most other coastal cities. Because Half Moon Bay is rife with abundant and readily available tourist accommodations, there is no need to prioritize expanding the market to include unlimited unhosted STRs at the cost of safety and quality of life concerns.

The Half Moon Bay Amendment allows for unlimited hosted STRs without a cap on the number of nights they may rent to tourists. The hosting requirement, therefore, encourages the continued operation and further development of affordable tourist accommodations along the coast. It encourages local residents to benefit from home-sharing while dissuading investors that remove housing from the market that should be available to local residents and their families. The Coastal Commission should approve the Half Moon Bay Amendment's hosting requirement.

The Half Moon Bay Amendment also requires that STRs be limited to the host's primary residence. Such Primary Residence Requirements ensure that STRs are operated as true home-shares and not as residential housing left otherwise vacant. Another benefit of primary residence requirement is that it encourages oversight, responsible supervision, and maintenance of the STR properties. Primary residence STRs are less likely to be left largely vacant or unsupervised and so maintain the quality of such accommodations for visitors and surrounding neighbors alike.

In addition, Primary Residence Requirements serve to protect housing for local residents. STRs that do not serve as a primary residence are housing units that are purchased and maintained for sole use as temporary accommodations. Half Moon Bay and many California coastal areas struggle with an on-going and deteriorating housing crisis and increasing

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homelessness populations. Half Moon Bay's regulation to require STRs in primary residences is responsible and reasonable and should be approved by the Coastal Commission.

The Half Moon Bay Amendment also provides for caps on the number of guests and cars at each STR. These regulations provide important safeguards for surrounding communities. One of the most common hotline complaints BNLA receives from neighbors are reports of nuisance and parking hoarding. Neighbors often complain of overcrowded, loud, and unsupervised STRs that overtake street parking. Addressing issues of nuisance and safety is imperative to assuaging neighborhood concerns and garnering support for STRs. Local communities must mitigate the negative impact of STRs on the surrounding communities' quality of life in order to better integrate STRs and to make them more tenable for the long-term.

The Half Moon Bay Amendment proposes regulations which address the concerns of both STR operators and their surrounding communities. It allows for unlimited hosted STRs, the most affordable STRs available to tourists, to operate year-round. At the same time, it protects local housing and communities by prohibiting units from being taken off the market and addressing nuisance and safety concerns. This amendment strikes a well-considered balance and should be approved by the California Coastal Commission without modification.

Sincerely,

/s/ Randy Renick

Better Neighbors LA

Sincerely,

/s/ Danielle Wilson

Unite HERE Local 11