

## CALIFORNIA COASTAL COMMISSION

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May 9, 2016

***SENT VIA EMAIL TO [kchafin@hermosabch.org](mailto:kchafin@hermosabch.org)  
AND REGULAR U.S. MAIL***

Ms. Kim Chafin  
Senior Planner  
City of Hermosa Beach  
1315 Valley Drive  
Hermosa Beach, CA 90254

**Subject: City Council May 10, 2016 meeting – ITEM 5 - TEXT AMENDMENT TO THE MUNICIPAL CODE, TITLE 1 AND TITLE 17, TO EXPRESSLY PROHIBIT SHORT-TERM VACATION RENTALS IN RESIDENTIAL ZONING DISTRICTS**

Dear Ms. Chafin,

Thank you for taking the time last week to talk through this issue and the City's impending action to expressly prohibit short term vacation rentals ("STVRs") in residential zoning districts, including in the Coastal Zone. Thank you also for your attention to this letter. This matter just recently came to our attention, and we are responding as quickly as we could, but we look forward to the more comprehensive dialogue that City staff proposes in the staff report addressing the proposed municipal code change noted above.

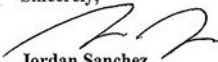
As noted in the City's staff report, the Coastal Act affords great protection to low cost overnight visitor serving accommodations. Commission staff agrees with that statement, and in addition, we believe the proposed ban on short term vacation rentals constitutes "Development" under the Coastal Act, as it constitutes a change in access to the coast, therefore requiring authorization via a Coastal Development Permit ("CDP"); the Commission has long considered lower cost accommodations to be facilities that are critical to providing coastal access. Without lower cost accommodation, a large segment of the population will be excluded from overnight stays at the coast. Since the City of Hermosa Beach does not have a Local Coastal Program certified by the Commission, the City would need to obtain a CDP from the Commission in order to regulate short term vacation rentals in the Coastal Zone. The Commission has consistently conveyed to local governments that a CDP, for an uncertified local jurisdiction, or an LCP Amendment and subsequent CDP, for a certified local jurisdiction, is necessary to impose such regulations.

Please note, that staff believes an outright ban of short term vacation rentals in the Coastal Zone of Hermosa Beach, without benefit of the necessary CDP, would be inconsistent with the public access policies of the Coastal Act. To that end, Commission staff strongly supports the City staff's recommendation to the City Council to direct staff to initiate a more comprehensive dialogue about the issue to investigate all possible options prior to amending the municipal code, and to coordinate with Commission staff in doing so. Attached to this cover letter, you will find a

letter that Commission staff recently sent to the City of San Clemente. In the contents of this letter you will find our general position with regard to STVRs.

Thank you for your attention to this matter. We look forward to working with the City to ensure that low cost visitor serving accommodations are provided and protected in Hermosa Beach. Please do not hesitate to call our office at (562) 590-5071 to speak with our staff if you have any questions.

Sincerely,



**Jordan Sanchez**  
**Enforcement Officer**  
**California Coastal Commission**

cc: **Lisa Haage, Chief of Enforcement, CCC**  
**Andrew Willis, Southern California Enforcement Supervisor, CCC**  
**Steve Hudson, Deputy Director, CCC**  
**Teresa Henry, District Manager, CCC**  
**Chuck Posner, Planning Supervisor, CCC**  
**Zach Rehm, Coastal Program Analyst, CCC**