

CALIFORNIA COASTAL COMMISSION

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LCP-1-TRN-16-0065-1

(CITY OF TRINIDAD SHORT-TERM RENTALS)

JUNE 8, 2017

CORRESPONDENCE

June 5, 2017

North Coast District Office California Coastal Commission
1385 8th Street Arcata, CA 95521

Re: Local Coastal Program Amendment Application No. LCP-1-TRN-16-0065-1 to Amend
Regulations for Short Term Rentals, Trinidad CA

California Coastal Commissioners,

I have never had any problem with having lots of tourists in our neighborhood; it's the commercial aspect that perverts the experience.

- 1) We support the letter from Kim Tays in its entirety and will not attempt to revisit those issues in these comments. "While the Preamble, Findings and Purpose of the Amendment sound good, the actual language governing STRs is, in many sections, poorly written, confusing and lenient in a way that unfairly favors STR owners/operators."**
- 2) Errors in the CCC staff report. a) Visitor Serving Accommodations:** Two RV parks! New hotel coming to Cher-ae Heights. There are NO mobile home parks in Trinidad. There are two RV parks zoned as Visitor Services. **Why would the CCC allow the inappropriate elimination and conversion of 37 spaces designated Low Cost Visitor Services?** Affordable housing cannot be RV's. Mobile homes are HUD approved, *RVs are not. **b) STR map shows vacation rentals as "active and inactive."** This is clearly a way to make it appear that there are fewer STR's than are actually permitted. STR's that were "inactive" have become "active". The Commission should request an update on the current total number of residential STR's in Trinidad. **c) The staff report is grossly incorrect in their statements regarding STR occupancy.** Last weeks Trinidad City Council budget meeting reported that STR's are occupied 80% of the time. The high concentration of vacation rentals on and around Trinidad's coast leads to steep competition for available housing options and the hollowing out of year-round, sustaining coastal neighborhoods.
- 3) Specific clarification of the CCC regarding zoning/planning changes that will be attributed to approving this amendment. Specifically in question are the changes to a) allow Commercial Business operations in Urban Residential zones, for only some residents. And b) the changes from Low Cost Visitor Serving zone for the Trinidad Trailer Park (a reduction of 37 approved sites) changed to "affordable housing". Are these zoning changes "mandated" by the CCC, as has been the report of the Trinidad City Council, Planning Commission, Trinidad City Planner and Trinidad City Manager? If they are mandated, does the CCC have the right to make these demands for an unfunded mandate to City? If the CCC is NOT mandating these proposed significant zoning changes what is their responsibility legally in approving these types zoning changes outside of public process? Can you legally require Trinidad to create substandard housing options in this TRAILER PARK?**

*Mobile Home is defined as “a detached residential dwelling unit designed for transportation after fabrication on streets or highways on its own wheels or a flatbed or other trailer, and arriving at the site where it is to be occupied as a dwelling complete and ready for occupancy except for minor and incidental unpacking and assembly operations, location on jacks or other temporary or permanent foundations, connections to utilities, and the like. A travel trailer is not to be considered a mobile home.” See Greene County v. N. Shore Resort, 238 Ga. App. 236, 237 (Ga. Ct. App. 1999) <https://definitions.uslegal.com/m/mobile-homes/>

Commercial Whole Home Short Term Rentals, without Primary Residents should only exist in commercial zoning. Every aspect of STRs when thought through, end up disadvantaging residential neighbors, diminishing their rights and quality of life. This is an industry based on a bad idea.

Tourist rights should never trump residents rights no matter how profitable the model is. What is really happening here? We have been attempting to connect the dots. What is appearing in the overall picture is that lobbyists may be behind the CCC and their decisions on STR's. We would like to have a different picture. Please take the opportunity today to assure us that our CCC works for the residents and taxpayers of California. The dots begin here. Legalizing commercial STR's in residential zones is a tactic to appease investors. Couching this action as “needed visitor services” is trying to make it sound as if this is for the common good. CCC Staff Report: ***The alternative of allowing only “Primary Resident Only Rentals” in residential zones, whereby everyone would be allowed to rent out their home for a maximum of 90 days per year, would not adequately protect visitor-serving facilities as required by the LUP. As stated above, Trinidad’s LCP has since its original certification in 1980 allowed for rooming and boarding of visitors in dwellings throughout the City as a type of principally permitted Home Occupation subject to standards regarding signage, noise, traffic, and other standards. Under the maximum-90-day “Primary Resident Only Rental” alternative, visitor-serving lodging opportunities in the City would be greatly diminished below what currently exists and below that which may be needed to serve demand, as seen in Table 3 (Appendix B) and Exhibit 6. “***

- “Airbnb [is valued](#) at about \$30 billion. The market capitalization of Hilton Hotels is nearly \$22 billion.”-NYT. This is BIG Business. During this past two year process in Trinidad, money was clearly on the minds of many, including the STR owners and operators, that benefit from visiting guests—and possibly in a more urgent way—Mayor Dwight Miller and some council members with their eyes on the city’s budget and TOT revenues. Residents were largely ignored. Same with many mayors around the country. 3/2/17 “In San Francisco, The City’s Board of Supervisors recently voted in new STR regulations. Un-hosted and hosted STR units can only be rented out for 60 days in total per year. San Francisco’s, Mayor Airbnb Lee, was not happy. He added, “There is a reason those bumper stickers are floating around town that say ‘AirbnLee, A Ron Conway Investment.’”“Tax money from short-term rentals has become a sort of drug that they have a hard time saying no to”.— Judith Goldman, co-founder of Keep Neighborhoods
First, <http://www.latimes.com/local/lanow/la-me-ln-airbnb-money-20170503-story.html>
<http://www.sfexaminer.com/mayor-lees-promised-airbnb-regulation-working-group-never-s-et/>

- **LA Times 2/3/17** “Even though major short-term rental legislation hasn’t passed at the Capitol, **Airbnb** still has a large presence in state politics. Its global head of policy, Chris Lehane, a long-time Democratic strategist in California, joined the company in 2015 after [running political operations for billionaire investor and environmental advocate Tom Steyer](#). Lehane is scheduled to speak on the 2016 election results at the Senate Democratic Caucus’ policy retreat next week. Airbnb spent nearly \$250,000 on lobbying efforts in Sacramento during the last two years, and company executives, including Chief Executive Brian Chesky, have given more than \$225,000 to **Lt. Gov. Gavin Newsom’s** 2018 gubernatorial bid, according to state records. “
- We bring this forward for a couple of reasons. We understand that the the CCC has undergone a loss of trust in the public eye this past year. We also understand that there are new Commissioners and a new Director, and that together they are working hard to change the public perceptions, that the CCC is in the pockets of developers. However, when we read this type of information and we see **Gavin Newsom’s** photo on the CCC website, we wonder. We wonder how the CCC can mandate these Commercial STR business in residential zones all up and down the CA coast? This is the perception of many, including our Trinidad public officials, that this is a CCC mandate. We wonder how and why zoning laws are being ignored and how California cities are being forced to trade residents for tourists to be CCC compliant. Could it be that this is the Great California Land Grab? Home stealing for the sake of money? Some do believe that. Please assure us today in your deliberations that you are here to protect Coastal Communities. And that the CCC is not just here to destroy residential communities and supplant them with quasi-hotel accommodations for big business. 8/7/2016 *“The California Coastal Commission has lost the trust of the public because of multiple Coastal-Act-violating decisions that turned out to be influenced by off-the-record lobbyist meetings.* We are aware that **Airbnb** is one of the biggest lobbying influences in CA today. We would like your transparency today in how this does or does not play into this staff report and our STR issue in Trinidad. With so many errors in this staff report and without inclusion of ANY modifications despite some very good community input from residents who are outside of the STR industry, we are concerned. Please help us to understand that you are working for us too.
<http://www.wilderutopia.com/environment/ca-coastal-commission-endangered-by-lobbyist-influence-peddling/>
- There was another good write up recently. 6/2/2/17 *“The Commission invariably goes head-to-head with some of the wealthiest land-owning interests in the state, who often contend the panel and its staff abuse their authority guarding California’s coast. Last year, ... was publicly described as a struggle between pro-development interests and pro-environmental interests. Affordable housing also remains an issue statewide, ...a paramount issue for the Commission. ...concerns were that “the commission (would) be more accommodating to developers and exert more influence over staff.”*
<http://capitolweekly.net/after-turmoil-coastal-commission-groove/>

We see conflicts of interest. Commercial STRs are all about top dollar from residential housing at the expense of tenant evictions and displacements, rising rents and the destruction of communities. Just because a cat has her kittens in the oven doesn't make them biscuits. As a direct result communities up and down the Coast, both counties and cities, are fighting the CCC to keep their communities. This does seem like a strange phenomenon. Santa Barbara County is currently strongly considering banning commercial STR's in residential zones. Many cities from San Diego, San Clemente, Los Angeles, Santa Monica, Santa Barbara, Ventura, Pacific Grove, Monterey, San Francisco, Sausalito, Mendocino and many more are fighting. Who are we really fighting here today? The CCC? The money? Vacation rental operators have done an incredible job of gaslighting the residents, and have actually managed to get us asking questions like, "Why do we even have laws?" and "Why should I be forced to follow laws that are inconvenient to me?" When one group decides they are above the law (and that profits are more important than the common good) it creates social justice issues. Commercial vacation rentals 365 days per year, with 2 night minimums, do not belong in residential zones. Something here, in this ordinance amendment, recommended for approval without modifications, smells. Like a dead whale in summer.

On March 30, 2017, it was determined in the United States District Court that "The Coastal Act does not authorize the Coastal Commission or any other person to override the exercise of the city's police power to adopt local land use legislation to protect the public health and general welfare of its residents. Rosenblat vs. Santa Monica

<http://www.courthousenews.com/wp-content/uploads/2017/04/Santa-Monica.pdf>

When individual vacation rental operators can have hundreds of thousands of dollars of annual income at stake, it's not always possible to tell what the true motivations are of those who suggest that we should ignore our laws, but only in regards to this one business scheme. Many communities all over the world are reporting the same thing. **The tourism boom is destroying our best destinations. Can anything be done to fix it?** Counties and cities alike. From Cuba to New Orleans and Barcelona to Venice, Australia, New Zealand, Greenland, Iceland. Trinidad are on the skids. Small town, small businesses and residential community, being lost. At a very rapid rate. For the CCC? For tourists?

"Most research, even Airbnb research, determine the greatest problems with STR's sit squarely with those who they call 'commercial hosts.' These are the individuals and companies that list multiple homes and apartments on short term rental sites in popular neighborhoods that are already experiencing low vacancy rates and rising rents, like Venice, Silver Lake, and Hollywood", and let's add Trinidad to that list. Given the same model of many communities, with 90 day STR rentals offer to all residents, you would be "retaining reasonable latitude for city residents to host and earn money from the Short Term Rentals".

<http://www.nbclosangeles.com/news/local/Airbnb-Housing-Rental-Investigation-424091834.html>

These types of STRs promote **Discrimination:**

June 2, 2017, New York Times: Ms. Garcia is not alone in feeling that way. Other users have reported [similar bias](#), and a [new Rutgers University study](#) – based on more than 3,800 Airbnb lodging

requests sent by the researchers – suggests it may be common: **Travelers with disabilities** are more likely to be rejected and less likely to receive [preapproval](#), or temporary clearance, for a potential stay, the authors found.

6/2/2017 “Here’s the flip side of our tech revolution: **Platforms like Airbnb seem to be perpetuating or increasing opportunities for exclusion, both economic and social,**” said Lisa Schur, a professor in the Rutgers School of Management and Labor Relations and one of the study authors.

“If we’re entering an era where these new types of hotels, which are essentially private homes, can’t offer accommodations, it defeats and undoes all of the progress we’ve made with the A.D.A. as far as equal access is concerned,” said Mason Ameri, one of the authors of the Rutgers study and a postdoctoral fellow at the university’s School of Management and Labor Relations.

https://www.nytimes.com/2017/06/02/technology/airbnb-disability-study.html?_r=0

Airbnb Makes it hard to sue for discrimination.

<http://www.newyorker.com/business/currency/how-airbnb-makes-it-hard-to-sue-for-discrimination>

Oregon Woman Sues Airbnb Alleging Discrimination

<http://www.insurancejournal.com/news/west/2017/03/09/444059.htm>

The majority of these STRs are beneficial only to the absentee property owner and the City coffers. They greatly and adversely impact our neighborhoods and the liveability of our communities. They’re basically running a hotel, a bad one without health and safety regulations and one that promotes discrimination, and they should be regulated as such. Perhaps I will open a bar/restaurant in my UR zone home?

3 KEY CONSIDERATIONS for Trinidad regulations for STRs, must serve as guidelines. The current STR amendment proposal fails to address these critical issues.

Housing supply and affordability:

STRs have a negative impact on affordable housing. The majority of Trinidad STR units are listed as “entire home”. These vast majority of these STR’s also are never used as primary residences.

According to a report by Dayne Lee from **Harvard Law & Policy Review**, “**Airbnb likely reduces the affordable housing supply by distorting the housing market... this decreases the supply of housing and spurs displacement, gentrification, and segregation**”. Dayne Lee’s report continues by summarizing the affordable housing problem, by stating “**tourists and renters are non-overlapping populations with different needs, traditionally served by non-overlapping markets**.” There is no data in your report on long term rent increases over the past two years? Why not?

CCC STAFF REPORT: “Third, the proposed regulations prohibit STRs in the City’s mobile home park (which contains approximately 37 mobile home spaces) to further protecting the City affordable housing stock. Together these provisions will contribute to keeping the cost of

existing housing down so it can continue to be available to people of a wide range of income levels with a desire to live in Trinidad, consistent with LUP policy 45(a).”

Trinidad has NO mobile home parks. There are two RV parks in Trinidad that are designated Visitor Serving Zones. Trinidad Bay RV Park and Hidden Creek RV Park. Why was the Trinidad RV park, with 37 low cost visitor serving designated spaces, incorrectly labeled a mobile home park in the staff report? **Is the Coastal Commission rezoning and intentionally converting these long time Low Cost Visitor Serving spaces to substandard “affordable” housing? Are you intentionally voting to eliminate low cost visitor serving uses? Are you switching out residential housing stock for substandard residential housing? RVs do NOT meet requirements for affordable housing.** Please address this clearly in your deliberations. We are aware that last year in Lawson’s landing you protected RV low cost visitor services with an enforcement action. What has changed? We had this specific conversation with Bob Merrill. He did not provide us with an answer. We hope that you will.

<http://www.mercurynews.com/2016/07/06/marin-countys-low-rent-riviera-shut-down-lawsons-landing-trailers-doomed-by-california-coastal-commission/>

Quality of life:

”He said the ordinance will not allow rental homes to be next door of each other.” ”They used to have a neighbor and now it’s sort of a little hotel next to them in a residential neighborhood,” said Trinidad City Manager, Dan Berman.

<http://www.krcrtv.com/north-coast-news/a-limit-to-short-term-vacation-rentals-in-trinidad/523303121>

Is this because adjacent vacation rental properties only disrupt half as many neighbors’ lives? Would it not make more sense to put these visitor accommodations all together? Shoulder to shoulder? That would better reduce impacts, right? When the employees show up every other day to clean, replace linen, garden, remove trash, they would not need to drive all over town, disrupting the neighbors with these commercial operations. They should ALL be adjacent to one another, in a part of town that is zoned for vacation rentals. This density limit does nothing but create a unconstitutional law that prohibits me from having the exact same opportunity as the rest of my “so called” neighbors, those of us that all bought on the same street, in the same Urban Residential Zone. Claiming that we could go the the City and request a variance, or CUP is NOT the same. That will go to court. Is that the side of the table that you want to be on? Or will you just walk away, and let the city handle that litigation? Or they can just approve anything that comes their way because they do not have the means to litigate it. This must be fair. Primary residents in the UR zone is fair.

Staff Report “The issue raised by one of the comment letters as to whether or not the proposed distance restrictions in the UR zone are unfair does not raise an issue of conformance of the proposed Implementation Plan amendment with the Coastal Act. Further, as stated above, the certified LUP supports the allowance of unobtrusive rooming and boarding of tourists in residential areas, which the proposed distance restrictions are intended to address. “

An STR must provide at least one off-street parking space for every two occupants, and STR owners/managers shall not use public right-of-way (street) spaces to meet their required off-street parking needs. We provided multiple cases to the CCC that show the City has not followed this but instead continues to issue parking exceptions in neighborhoods impacted with parking issues.

Enforcement of requirements

Standards are enforced only by complaint, which has clearly not been an effective enforcement tactic. Who is suppose to pay for this administration and enforcement? Is the CCC creating an unfunded mandate? Is it the residents, who suffer daily with commercial hotels next door, who are mandated to operate as the front desk, who have lost property value because they cannot have the same opportunity? Are we also supposed to pay subsidies to these commercial enterprises? Why don't STRs have to comply with Building Codes, civil rights, Disability, Fire & Rescue legislation etc, etc, etc?

Vacation rentals are profitable solely because they can pick and choose which regulations they feel like following. We remain committed to restoring residents rights. This amendment is absolutely the wrong thing to do for Trinidad.

Thank you,

Tom Davies
Kathleen Lake
435 Ocean Ave.
Trinidad CA 95570

May 5, 2017 Tourism is 'destroying' cities, says Amsterdam marketing head. "Amsterdam is not a big city – 800,000 live in the city and we have 17 million visitors a year," he said. "When you say to local people 'Tourism is about jobs' they say 'I don't care. "They are voters and they say 'The visitors have to go.'"

<http://www.travelweekly.co.uk/articles/278587/tourism-destroying-cities-says-amsterdam-marketing-head>





From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Cc: [REDACTED]
Subject: Comment on Trinidad's STR Ordinance
Date: Monday, June 05, 2017 10:03:39 PM

Dear Ms. Kraemer,

I wanted to supplement comments made by Rachel Duclos (my wife) for the hearing on the Trinidad STR ordinance. The entirety of the STR ordinance process has been an eye-opening experience of seeing how good intentions can be impacted by xenophobia and a desire of some Trinidad residents to harm the economic interests of responsible vacation rental property owners and managers.

We supported the concept of a cap on vacation rentals. We appreciate that the City is trying to balance a number of interests and to find workable solutions. There is certainly validity to wanting to limit the number to try to encourage more local full time residents. Having said that, if the City is going to take away the legitimate property rights of the vacation rental owners through making the rights non-transferable, the City ought to have a reasonable basis for doing it and do it in a way that has the least impact to property rights.

Ask the City these simple questions - given that 5 houses have converted from vacation rentals to non-vacation rentals in the last few years, isn't it entirely possible that mere attrition will result in achieving the goals of the cap on vacation rentals without resorting to banning transferability of the vacation rental permits? Ask them whether the transferability ban will lead to having more local residents when it is entirely possible the homes (particularly like ours with an ocean view) will be bought as non-rental personal vacation homes (with less occupancy and less access for coastal visitors)? Ask the City why the transferability ban continues to be in place for vacation rentals beyond the point that the number of vacation rental permits has been reduced to the cap number?

The answer to these questions unfortunately leads to the conclusion that the City's motivations for having the transferability ban have little to do with the cap on vacation rentals, and more to do with taking away the permit holders' rights so they can be given to others. That is not fair to older long time vacation permit holders who have depended economically on that income for themselves and their families or people like us who recently bought our house having factored in the vacation rentals.

As a side note, in looking at the occupancy of the vacation rentals, the Coastal Commission staff is off the mark. Rachel and I have been visiting Trinidad for the last 15 years and it has always been difficult to find a house to rent. Our own house (which has been off the market since last August being remodeled and skews the staff's numbers) is nearly full from now through September despite the fact we just put it back on the market in the middle of May and we fully intend to keep substantially occupied year round.

We appreciate your close consideration of the matter.

Marc Gottschalk
General Counsel

Osterhout Group, Inc.
807 Edwards Street
Trinidad, CA 95570

From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Comment on Trinidad's STR Ordinance coming up for vote on June 8
Date: Monday, June 05, 2017 1:33:36 PM

Dear Ms. Kraemer,

I hope this email arrives in time to be included in the public documents. If not, I may ask a local neighbor to read my email during the public comment period at the meeting.

I have been coming to Trinidad annually for more than 40 years, in recent years twice a year. My husband and I bought our home in Trinidad last summer. Our home is permitted as what is called a Full Time STR in the proposed ordinance. We feel that the issue of transferability brings considerable negativity to relationships within the City without enough gain for the City, economically or otherwise, to warrant a real property taking from a subset of neighbors. We believe that this kind of action reinforces an unfortunate Us vs Them attitude that sometimes shows up in public commentary at City public meetings and in the town socially. Jonna Kitchen is not exaggerating when she wrote that there are some quite vocal residents who loathe the vacation home owners AND the tourists who come to access the coast, which the state of California has long maintained is a birthright of all people. If one of the stated goals of updating the STR ordinance is to support a vibrant local community (having more volunteers is often cited as a need), we do not believe that this aspect of the ordinance meets that goal. It seems like allowing for one transfer so that owners can plan financially would be reasonable.

The transfer issue is not, however, our biggest concern about the proposed ordinance. The required meet and greet strikes us as unfair to the the local small business owners (including Jonna and Reid Kitchen) who manage the vacation homes. There is one notorious incident that comes up repeatedly in town meetings - a very loud party - that seems to be the primary root of this requirement. Jonna and Reid have sterling reputations for the positive and professional way that they manage vacation homes and visitors. There are other small local vacation management businesses with equally good records. The meet and greet requirement (in addition to the requirement about license plates, and responding within 30 minutes, like a doctor on call) would be logistically unreasonably onerous if not impossible to achieve. The fine of \$1,000 per day leaves a lot of questions about enforcement unanswered. Generally, the rules around managing the behavior of the visitors seem fairly messy and extremely difficult to evenly enforce.

Please consider asking the City of Trinidad to look again at a few of the provisions of the proposed ordinance.

Sincerely,

Rachel Duclos
Marc Gottschalk
807 Edwards Street
Trinidad

California Coastal Commission
North Coast District Office
1385 Eighth Street, Suite 130
Arcata, CA 95521-5967

June 2, 2017

Hello,

My name is Arlene Miller. I am an owner and manager of 1 vacation home in Trinidad. Many of my short term guests are wonderful families attending weddings and holidays with their relatives that live in this area. In my experience I find them excited at having the opportunity to experience our beautiful north coast and also respectful of their surroundings.

I have read the new ordinance with it's changes as listed on the City of Trinidad website. I would like to point out a discrepancy I found on the final resolution no. 2016-11, #17.56.190(6.26), section 2, page 6. I have provided copies of the pages I am addressing.

This section is entitled "Contact Information". The first paragraph labeled "a)" states that the designated contact person must live within 20 miles of Trinidad. This is a revision from the previous ordinance which states 25 miles of Trinidad. I contacted the City of Trinidad when I first noticed this change and I was told it was probably just a typo. It was not until recently that I noticed it was still left at 20 miles.

This 5 mile change eliminates any managers from Eureka, our county hub. I have not gone through a list of addresses of managers of vacation homes in Trinidad to see how many this change would effect, but I am effected by this 5 mile change.

Perhaps it should state within 25 minutes travel time? As the response time for a complaint states it should be within 30 minutes and it is an approximately 25 minute drive from Eureka to Trinidad. Or possibly the amount of miles should be excluded altogether as long as the response time for a complaint is within 30 minutes.

Thank you for your time.

Respectfully,

Arlene C Miller

Existing Ordinance

defend and hold the city harmless from any and all claims and liability of any kind whatsoever resulting from or arising out of the registration of a VDU.

An initial VDU License Fee, as set by resolution of the City Council, will be charged for the first year of each VDU's operation.

The City will notify all property owners within 100 feet of a VDU property of the VDU License within 7 days of its issuance or re-issuance. This notice may be combined with the required 24-hour emergency contact phone number notice required in subsection 3.b below.

Upon initial application for a VDU License, the City shall provide all VDU licensees with copies of informational materials identifying protective measures for preventing and minimizing impacts to environmentally sensitive habitat areas, water resources, and septic systems from the vacation rental use of the residences. Such protective measures include, but not limited to: (1) avoiding human encroachment into environmentally sensitive habitat areas; (2) directing or screening exterior lighting from illuminating riparian corridor areas; and (3) best management practices for the proper handling and disposal of trash and chlorinated water from hot tubs, swimming pools, and other spa facilities.

2. VDU License Renewals.

The fee for annual renewals for subsequent years shall be set by resolution of the City Council. Any changes to the site plan, floor plan, allowable occupancy, or rental agreement shall be submitted along with the license renewal.

3. Contact Information.

a. Local Contact Person.

Each VDU must designate a local contact person on the VDU License form. That person may be either the owner or the property manager, and that person must live within 25 miles of Trinidad so that he/she can respond personally to an emergency.

b. 24-Hour Emergency Contact Phone Number.

A 24-hour emergency contact phone number is required for each VDU. The 24-hour emergency contact phone number shall be prominently placed for the occupants' use inside the VDU. Any change to the emergency contact number shall be promptly provided to the Trinidad City Clerk and posted within the VDU.

The emergency contact phone number will be forwarded by the City Clerk to the Trinidad Police Department, the County Sheriff's Office, the Trinidad Volunteer Fire Department, and to each neighbor within 100 feet of the VDU within 7 days after the issuance or reissuance of a VDU License for the VDU.

The emergency contact information sent to neighbors may include further instructions in the case that a response from the 24-hour emergency contact number is not forthcoming. If there is an emergency or complaint, and the emergency contact person does not respond within a reasonable period of time, concerned persons will be encouraged to report the emergency through the 911 emergency calling system or the Police or Sheriff's Department. It is unlawful to make a false report or complaint regarding activities associated with a VDU.

17.56.190 (6.26).E

Effect on Existing Vacation Dwelling Units.

Each individual operating a VDU existing at the time the VDU Ordinance is adopted, including those currently holding a valid Trinidad Business License, shall be subject to the requirements of this Section of the Zoning Ordinance upon its adoption. The owner of an existing VDU which does not meet the requirements of this Section will not be issued a VDU License and shall not use the VDU structure for VDU purposes.

New ordinance

environmentally sensitive habitat areas, water resources, and septic systems from the short term rental use of the residence. Such protective measures include, but are not limited to: (1) avoiding human encroachment into environmentally sensitive habitat areas; (2) directing or screening exterior lighting from illuminating riparian corridor areas; and (3) best management practices for the proper handling and disposal of trash and chlorinated water from hot tubs, swimming pools, and other spa facilities.

2 Contact Information

a. Local Contact Person (LCP).

Each STR must designate a Local Contact Person on the STR License form. That person may be the owner or the property manager. The LCP may designate a temporary LCP for a specific rental night(s); that designation must be reported to the City at least 24 hours before the rental date. The LCP, or their temporary designee, must live within 20 miles of Trinidad and be able to respond personally to an STR concern within 30 minutes.

b. 24-Hour Contact Phone Number.

A 24-hour Contact Phone Number is required for each STR. The 24-hour Contact Phone Number shall be prominently placed for the occupants' use inside the STR. Any change to the 24-hour Contact Phone Number shall be promptly posted within the STR and provided to the Trinidad City Clerk at least 15 days prior to any change. A temporary LCP designee shall utilize the same Contact Phone Number as the LCP.

c. Distribution of Contact Information

The name of the LCP and 24-hour Contact Phone Number will be forwarded by the City Clerk to the Trinidad Police Department, the County Sheriff's Office, the Trinidad Volunteer Fire Department, and to each neighbor within 300 feet of the STR, and posted on the City's website within 10 business days after the issuance or reissuance of an STR License for the STR.

The contact information sent to neighbors may include further instructions in the case that a response from the LCP is not forthcoming. If there is an emergency or complaint, and the LCP does not respond within a reasonable period of time, concerned persons will be encouraged to report an emergency through the 911 emergency calling system or the Police or Sheriff's Department for other complaints. It is unlawful to make a false report or complaint regarding activities associated with an STR.

3 STR License Renewals

STR licenses shall be renewed annually. Renewals must be submitted by February 1. New STRs that received a license after October 1 do not need to renew their license until the February after the license has been in place for a year. Any changes to the site plan, floor plan, allowable occupancy, or rental agreement shall be submitted along with the license renewal application. Existing STRs that have not had an initial inspection as required by §17.56.190.E.1.c will be subject to such an inspection.

Although the renewal process includes a staff review of City records and other pertinent information specific to complaints, if any, that have been received about the particular STR, it is the intention of the City of Trinidad that there is a presumption that an application for renewal of an STR License for an existing STR will be approved as long as all applicable standards are still met unless or until such time as the license is revoked pursuant to §17.56.190.R.4 (6.26.R4, *Revocation*) or 17.56.190.M.14 (6.26.M14, *Minimum Activity*) or until the STR license expires pursuant to 17.56.190.J (6.26.J, *License Transferability*) or if it is voluntarily withdrawn.

4 Appeals

Appeals of staff determinations or decisions in accordance with this section shall be appealable per section 17.72.100 (7.14) except that STR License decisions are not appealable to the Coastal Commission because they do not constitute a Coastal Development Permit. Notwithstanding section

Dennis and Jean Halkides
833 Mistletoe Lane
Redding, CA 96001

Re: LCP AMENDMENT NO.LCP-1-TRN-16-0065-1 (City of Trinidad Short Term Rental Ordinance Hearing) set for June 8, 2015 At HSU

Dear California Coastal Commission,

My wife and I, both in our 70's, have owned property in Trinidad, Ca since 1999, and I personally through family have had ties to this coastal area since a child (a long, long time ago).

We purchased property in Trinidad in that year to have multiple purpose use--a STR (then we just called it a Vacation Rental), a place available for our family to stay on our visits to the coast from Redding, as well as a place to retire eventually. The STR income paid many of the bills and enabled us to afford to do this. We built a second home on the adjoining lot and it was completed in 2005/2006, and likewise used as a STR with the first house eventually becoming full time, fully occupied rental.

We invested in both properties at a time when there were no restrictions on STRs other than buying an annual business license, which we did yearly. We have kept up both houses in a well maintained, inviting manner, which in my opinion, incrementally raises the property values to all the surrounding properties and helps make Trinidad an inviting area for locals and tourists alike. Our properties have ocean and bay views, and over these many years, and have been shared this with our children and grandchildren and with hundreds of guests who have been able to enjoy the coastal beauty of our area for the last 15 years.

During this time, all owners of STRs have:

- (1) Paid property taxes to Humboldt County, part of which goes to Trinidad;
- (2) Our homes have generated the yearly TOT, Transient Occupancy Tax, which together with all of the other STRs, have funded 63+% of the City of Trinidad's annual budget;
- (3) Have employed people to help maintain the properties, creating jobs;
- (4) The STRs in Trinidad in total, have brought thousands of tourists into the area to share it's coastal beauty, shop at our local Chevron Gas station and mini mart, our local Murphy's market; our local restaurants, gift shops, art galleries and on and on, which have allowed these businesses to remain profitable and open helping Trinidad thrive;

- (5) These businesses have also paid taxes—sales tax and property taxes, a part of which contributes substantially to the coffers of the City of Trinidad. In short, the financial benefits of all of the STR have allowed the City of Trinidad to exist on a much better financial footing than if there were none.
- (6) The STRs as a group have provided access to the Humboldt County Coastal areas, which would otherwise be lost to thousands of people, since there are no hotels or other facilities available to house the tourists that come here that are close to the bay and ocean. Without the STRs, there simply is no place for tourists to stay in Trinidad except at trailer parks and motels on the old highway, some miles from coastal access.

Despite the financial and tourism contributions made by STRs the City of Trinidad's current governing body has treated STRs quite harshly in the past few years, leading to the present Ordinance being considered by the Coastal Commission, having been passed by a town counsel hostile to STRs. Incidentally many of the owners live outside of the City Limits and thus cannot vote for local representation, have difficulty attending City Counsel meetings, which often get cancelled at the last minute or are noticed in less than the legal time required, causing lack of attendance to City Counsel and Planning Commission meetings contributing to either under representation in the formation of this proposed ordinance or and total lack of representation on the City Counsel and it's decisions.

As an example, there have been NO appointments to the Planning Commission by the Town Counsel of anyone that is a Trinidad STR owner, but rather only appointments of members who are openly hostile to STRs and publically called for their elimination.

This proposed STR Ordinance is a result of this open hostility to STRs by a vocal minority in power at the time. The best interests of the City are not being considered and the property rights of the STRs/STD are totally being ignored.

There are many onerous provisions of this ordinance, designed to not only discourage STRs in the City of Trinidad, but to eventually eliminate them. However, **The MOST IMPORTANT ISSUE that this ordinance creates for STR owners is the non-transferability of ownership** through the sale of the house or through death and


inheritance. If allowed to stand, this Ordinance before you would prevent me from passing the property including the STR status to my children or to a new buyer, causing my property an immediate loss of market value.

An STR permit is a property right acquired many years ago and the City of Trinidad is attempting to take this away without compensation. This is INVERSE CONDEMNATION, and an illegal act without proper compensation, which the City cannot afford.

This is an invitation to future litigation which no one wants and likewise, the City can not afford.

In affect, if the California Coastal Commission strikes this onerous and illegal "taking of property rights" from this ordinance, it would be doing the right and fair thing as well as save the City of Trinidad from itself in future litigation.

Sincerely,



Dennis Halkides



Jean C. Halkides

Dear California Coastal Commissioners,

I lived in Trinidad for 12 years, raised my children there, and own two properties in town. I also own a Vacation Rental Management Company called Redwood Coast Vacation Rentals and we manage a total of 6 vacation rentals in Trinidad. I have been intimately involved in the STR Ordinances and would like to make some comments on the current ordinance that you are considering for certification.

1. To begin with, I strongly support the comments that were submitted by Jonna Kitchen in regards to this ordinance to the Coastal Commission the last few days.
2. To the above point, the following points I feel are most important:
 - a. Any cap should be a percentage rather than a fixed amount due to allow for future development. The occupancy data is much tighter than presented in the staff report that you received. Our typical summer occupancy is close to 90%.
 - b. Having a limit of twice the occupancy is discriminatory and not necessary. The limit of 20 has not been a problem. In fact this new ordinance was started before the first one really had time to take affect.
 - c. Licenses should be transferable at least once. Others that are against vacation rentals can take up the new permits when they become available and not vacation rent the homes for more than 60 days and therefore remove that option for vacationers. This will cause less supply and make the prices unaffordable.
 - d. Many items related to the operation of the vacation rental are burdensome, unfair, and impossible to ensure they are taking place. This will create unnecessary conflict. Having to alleviate any complaint, in person, within 30 minutes of a call is better than the sheriff can even do! This requirement needs to be loosened to be reasonable. Having guests have to read the entire ordinance is ridiculous, and in some cases will put off potential guests to the point that they will sense hostility against them and choose somewhere else for their well deserved, hard earned vacation time with their loved ones. And, many booking channels do not allow us a way to do this.
 - e. The ordinance has these huge fines for owners or managers if their guests violate any of the rules, yet we cannot control this – we can just control that they know the rules and how we respond if they do not. This needs to be removed. The guests need to be responsible for their behavior, and the managers/owners need to be responsible for how they respond. At the same time, almost nothing is written about false or exaggerated complaints. In fact, the ordinance states that if public safety officers have to come it is automatically a significant violation, which can lead to a revocation of one's STR permit. This will create safety issues because managers/owners will call public as a last resort (what about a domestic dispute going on with 2 guests?), and could easily jeopardize their own safety.
 - f. Finally, this ordinance and the previous one limited the # of vacation rentals to one per parcel, without grandfathering in existing ones. This is an illegal taking, as rules in the recent case against the city of Anaheim, and needs to be rectified.

3. In summary, this ordinance is unfair in many ways, very biased against STR owners/property managers & guests and needs to be sent back to the Trinity City Council with the changes that we are recommending so that Trinidad remains a village that is welcoming to tourists.

Sincerely,

Mike Reinman, Redwood Coast Vacation Rentals

(707) 496-8746

From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Trinidad STR regulations
Date: Thursday, June 01, 2017 2:23:12 PM

Hello Melissa

This letter is in regards to Trinidad and its role in Pacific Coast tourism. I have been a member of the Trinidad community since 1951.
My family has been involved in the fishing and tourist business since 1967 when my grandmother opened the "Sea Around Us" on Main St.
My husband and I currently own two retail businesses on Main St as well as a vacation rental on Van Wycke St. We have successfully served tourists visiting the Redwood Coast for over 25 years.
The vitality of Trinidad is directly connected to our visitors who come from around the world to enjoy the pristine beauty of our coastal area. Today and historically Trinidad has been a destination for tourism. We must insure that visitors feel welcome and continue to visit beautiful Trinidad.
I have attached Jonna Kitchens letter to the Coastal Commission, we agree wholeheartly with her comments and suggestions.

Thank you for your time and assistance.

Lore Snell and Casey van Alten owners of
Trinidad Trading Company
Windansea
Boathouse vacation rental



[CCCLetter \(1\).pdf](#)

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From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Fwd: LCP amendment number LCP -1-TRN-16-0065-1
Date: Thursday, June 01, 2017 10:08:28 AM

Dear coastal commission members,

My name is Anik Domb and my husband and I have owned a vacation rental in Trinidad for the past 10 years. During this time we have been very compliant with all of the rules and regulations pertaining to vacation rentals. My property managers have been very professional and manage my property with sensitivity and respect to the community of Trinidad. We have participated in many of the fundraisers related to the schools and Library in your community. The TOT taxes that we have generated have made great contributions to the schools and community as well.

After reading the PC packet, I have some concerns regarding some of the proposals. A licensing term of a five-year maximum limit is very unfair to those who have had no infractions against us and have run a very compliant business. Every year we fill out the VDU business applications and go through the process of making sure our septic system is in working order as well as other items requested, not to mention physical inspection of the property from the city inspector. We have followed all the rules and regulations pertaining to our vacation rental. By imposing a five-year limit and having to participate in a lottery would seem unfair to those of us who have been compliant and following all the rules. I do not understand why we should be penalized and I am hoping that you will consider grandfathering those existing vacation rentals that have had no infractions against them. The other concern we have is that if you implemented this lottery and my neighbor is selected first then I would not be able to get my license to run my vacation rental. The real estate values would fluctuate if this were to occur. There would be no guarantee that a long-term tenant would be any better for the community considering many of us vacation rental owners do not live in the town of Trinidad therefore you would be transferring your concerns from a short-term rental on to a long time rental. I do not understand how that is going to solve any of your concerns.

I am also hoping that you will consider transferring existing vacation rental permits /license upon sale of real estate. This will greatly affect our ability to maintain property values in Trinidad.

I do understand that there have been some problems with property managers that have not been responsive to complaint regarding noise issues etc. and those are the properties that should be looked at. If they are not complying with the rules and regulations then those are the properties that need to be addressed. My current property manager manages three homes in the community and she lives right in town and is able to address any issues that arise immediately. Joe and Lynda Moran treat these properties as if they were their own and really screen incoming guests and have them sign lease agreements acknowledging all the rules for the vacation rentals. In other words, vacation homes that are not managed adequately are the licenses that should be revoked.

We have run a very respectful business for 10 years and would like to continue to do so without any concerns about losing our business license as well as our ability to transfer upon sale of property.

Respectfully I ask that you consider grandfathering us in.

Respectfully yours
Anik Domb

Sent from my iPhone

--

Lynda Moran, Owner/Operator

Trinidad Bay Vacation Rentals

PO Box 886

Trinidad, Ca 95570

707.845.1144

707.677.2011 fax

lynda@trinidadbayvacationrentals.com



From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Fwd: City of Trinidad STR ordinance
Date: Thursday, June 01, 2017 9:48:57 AM

Dear Coastal Commissioners

I have owned a vacation rental in Trinidad at 829 Edwards St for 19 years. It was a vacation rental for 2 years before I purchased it. I have always been in compliance with the rules and have no complaints on file for my property.
I believe in very strong property management. Lynda and Joe Moran live only a few blocks away and take care of problems immediately.

My home is 1600 square feet but only has a one bedroom septic system.
It is usually rented to 2 people but 4 can easily stay. It has 2 bathrooms and plenty of room for 4 people. I feel it is punitive to mandate only 2 people per bedroom.
My home has an available 2 car garage and off street parking for 2 more cars.

Regarding transferability of the license I feel owners who are in compliance and have proven track records should be able to sell the house with the license .

Respectfully
Gloria Speigle

Sent from my iPhone

--

[Lynda Moran](#), Owner/Operator
[Trinidad Bay Vacation Rentals](#)
PO Box 886
Trinidad, Ca 95570
707.845.1144
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lynda@trinidadbayvacationrentals.com



5/30/2017

Ms. Melissa Kraemer
North Coast District Office California Coastal Commission
1385 8th Street Arcata, CA 95521

Re: Local Coastal Program Amendment Application No. LCP-1-TRN-16-0065-1 to Amend Regulations for Short Term Rentals (STRs)

Dear Ms. Kraemer:

Please forward this letter to all of the California Coastal Commissioners and local staff for their review and submission into the public record. I appreciate their time and consideration.

I believe that the CCC can help Trinidad to reach a more fair policy focused on the true facts that will provide for more growth in lodging over time and create more coastal access to our visitors while benefitting the whole community. The STR Ordinance being presented is overreaching, punitive and unwelcoming to both our tourists and our STR owners and managers and will very likely drive both tourists and STR owner/managers out of Trinidad's city limits. Trinidad's existing ordinance has provided ample regulations regarding noise, parking, visitors, occupancy, septic, water and trash. It has done a good job determining the difference between a complaint and a significant violation of which there has been only 1 out of thousands of stays. The only significant regulation it lacked was placing a limit on the number of STR's allowed. I believe that capping STR's is merited in an effort to maintain balance between lodging and residential use in our community. However capping STR's will not guarantee owner occupied homes; will not make homes more affordable for families; will not promise better neighbors and will not ensure volunteers for the city council and fire department. According to the U.S. Conference of Mayors, "Fair regulation of STR's ensures greater compliance and greater receipt of local hotel taxes. Onerous regulations of STR's can drive the industry underground, thus evading local regulations and local hotel taxes." I believe that the new STR Ordinance as presented will do just that and below you will see my reasoning. **I propose simply adding a cap to the current STR Ordinance and leaving the rest of the existing ordinance alone. If the CCC doesn't not find this to be a suitable option then I hope that the proposals outlined below will be considered.**

Background - Visitor Serving accommodations in and around Trinidad:

Short term rentals (STR's) contribute to the local economy, enrich diversity and fabric of our community and have been part of the Trinidad experience for decades. STR's offer a diverse and affordable lodging experience where visitors can enjoy ocean views and access to the local beaches. An STR is a residence that guests use as a residence not a hotel. Within the same year an STR can house its owners, tourists and also be used as a short term, month to month rental. The CCC has supported STR's in residential zones. Traveling families find STR's more spacious, less expensive than hotels/motels and a better way to experience what it is like to live in a particular town. Unfortunately the CCC staff report does not acknowledge the full history of Trinidad as a tourist town. **In Images of America - Trinidad**, by Dione F. Armand, a local history book, there are photographs depicting two very vibrant commercial centers in Trinidad that boasted 3 hotels located in Trinidad back in 1893, The Occidental Hotel, Trinidad Hotel, and Pinkham Hotel. **Tourism is not new to Trinidad**, what has changed is the type of lodging offered to visitors coming to visit the coastal beaches and landmarks. Trinidad has not had any hotel let alone 3 hotels for likely over 100 years. Over the years since hotels, RV Parks offered a great number of visitor services with 2 RV parks in Trinidad's city limits,

Hidden Bay Trailer Park and Hidden Creek RV Park. Those parks have been converted to nearly all residential sites with very few visitor sites now available. Hidden Creek RV Park has also become riddled with drug problems and crime in recent years and is a very inhospitable place for tourists. The only other lodging aside from STR's in Trinidad has been the Trinidad Bay Bed & Breakfast which is limited in size and scope. Trinidad has offered vacation rentals in residential neighborhoods for over twenty years. I know this because I bought **Trinidad Retreats**, the first vacation rental management company in Trinidad, 6 years ago from Gail Saunders who started it 21 years ago. **Vacation rentals are not new to Trinidad.** Talk to people from Redding and they will tell you that they have been renting vacation rentals in Trinidad for nearly 30 years! The popularity of vacation rentals as a desirable lodging option however has flourished with the advent of the "shared economy", the internet and platforms like Vacation Rental by Owner (VRBO), Airbnb, Expedia, HomeAway, FlipKey, TripAdvisor, the list goes on and on. It is true that the number of vacation rentals has increased over the past 15 years and is currently approximately 15% of the housing stock. In the six years that I have owned Trinidad Retreats and managed approximately 20 vacation rentals in the greater Trinidad area I have seen a tremendous growth in the demand for STR's from small to large homes with a wide variety of affordability. A majority of motels and RV Parks along Patrick's Point Drive have become rundown and poorly managed. They are also cost prohibitive for larger families who need to rent 2 rooms to accommodate a family of 4 - 6 people, who prefer cooking and saving money and also like to travel with their dog(s). Vacation rentals are an affordable way for families to share a home, save money by cooking and bring their dog to visit the beaches too.

Local Economy - Until about 5 years ago, vacation rentals mostly just existed in the greater Trinidad area as this has been the most sought out area for tourists to visit and stay. There were hardly any STR's elsewhere in Humboldt County. Now there are hundreds of STR's in Arcata, Eureka, McKinleyville, Ferndale and even Willow Creek. Humboldt County collects millions of dollars now in Transient Occupancy Taxes. As the demand for STR's has soared the supply has responded with a huge increase. Vacation rentals contribute to the local economy not just in Trinidad but also in Humboldt County overall. They are Trinidad's **number 1** revenue stream with \$126,000 collected in transient occupancy taxes in 2014/5. Each STR generates an average of \$4000 in Transient Occupancy Tax. Limiting STR's will have a direct effect on the Trinidad economy. Trinidad was once a whaling town, then a logging town and fishing village but those industries have become nearly obsolete. Tourists spend countless dollars at our local Trinidad market, shops and restaurants. STR's in Trinidad provide at least 25 local jobs including housekeepers, reservationists, managers, handymen, trash service, landscapers, etc. STR owners are significant donors to the Trinidad Library, Museum, Trinidad School Education Foundation and many other local organizations. They are asked countless times each and every year to donate stays at their homes for local auction events and fundraisers.

Despite the rise in the number of full time STR's in Trinidad over the past decade, Trinidad School enrollment has been rising from 181 students this past year up from 142 students in 2008. The general population (US Census Bureau) has also increased from 215 people in the year 2000 to 257 in year 2014. If there are fewer people volunteering to be on the city council or volunteer fire department it may be more closely linked to a reduction in volunteerism or be simply due to the fact that people are busy commuting to jobs outside of Trinidad and don't have the time. STR's attract more tourists and revenue while adding diversity to the local community. Tourists and STR owners both contribute greatly to the local economy.

Without the full support of STR's in Trinidad and room for continued growth, tourists may no longer have adequate lodging and access to the coast and the city may not be able to afford to maintain its city staff and services

Occupancy - The data the CCC staff reports about occupancy levels is grossly inaccurate. The reference claims that existing STRs are operating at less than 50% of occupancy levels. The data referenced to support this claim comes from one Airbnb Occupancy Graph. Airbnb has not been used by the majority of STR's in Trinidad and the ones using this site have done so for approximately 1 year. Airbnb represents a very slim number of reservations for Trinidad STR's. Most Airbnb users are seeking smaller, less expensive lodging than the types of STR's offered in Trinidad which in general are 3 bedroom homes, ocean view homes that sleep 6 and average \$300 per night. The majority of guests book either directly through local management company websites or more commonly through Vacation Rental By Owner (VRBO). The average occupancy for Trinidad STR's is closer to 80 - 85% between June - August. In addition STR's are 100% sold out for 3 days around the following "Holidays" each and every year: Humboldt State Graduation weekend, Memorial Day Weekend, 4th of July, Labor Day Weekend and Thanksgiving. Christmas, New Year's Eve and Easter are occupied closer to 80% due to rainy weather and poor road conditions. The vacation rental season for Trinidad begins mid May with HSU graduation weekend and continues through mid September, after Labor Day Weekend. The second half of June, all of July and the first half of August is our very busiest time. Comparing our local area to San Luis Obispo, Santa Cruz and Carpinteria is like comparing apples to oranges. We are very remote, much smaller and our town is entirely in the coastal zone. We also have some of the most popular State Parks just 5 - 10 minutes away, Patrick's Point State Park and Humboldt Lagoons State Park and Redwood National Park situated just 20 minutes North. These parks that generate tons of tourism to our remote area. Trinidad is known as the "Crown Jewel" of the North Coast and is the ideal place for lodging that allows guests to access the local beaches and visit the Redwoods.

17.56.190 (6.26).F Maximum Number of Short Term Rentals

I propose a CAP of 15% in the UR zone which currently would translate into 19 STR's but if the additional 10 lots get developed over time there would be an additional 2 STR's allowed. I propose NO CAP of STR's in the SR Zone as these STR's tend to not cause disturbance to neighbors, do not directly affect the "character" of the community since they are not in the downtown proper and tend to be some of the most desired properties with the highest occupancies due to their ocean views, beach trail access and sense of privacy. To suggest that Primary Residence STR's will offer additional lodging is unrealistic. This has not been a source of STR's in the past and is highly unlikely to be much of a source in the future. The only reason Primary Residence STR's got added to the ordinance was because the handful of anti-STR citizens in Trinidad decided at the last minute that the CAP on STR's may preclude them, those most vehemently opposed to STR's of possibly ever having a chance to have their own STR! It is very difficult to convert a primary residence into a quality STR with owners having nearly all of their personal belongings in a home. Not to mention that most management companies would not want to invest in managing an STR for only 2 months a year with the increasing cost of marketing, advertising, housekeeping, etc. It is also highly unlikely that there will be STR's in PD Zones. There has been no obstacle to there being STR's in the PD Zone and yet there have **never** been an STR. Currently there are 21 dwellings in the PD Zone and yet there are NO STR's.

The most ideal place for STR's because of more space between properties and generally more ocean views and access to the coast for visitors is in the SR Zone. These STR's **never** receive complaints. I manage 3 of the current 6. Like all other STR's they have to have their septic certified, post information about sensitive habitat, and follow all of the other current STR Ordinance rules. These are the kinds of properties people like to invest in as a second home. These investors choose to vacation rental these homes as a way of not only protecting their investment by having it well maintained and managed but as a way to have access to their home that they would not have if they converted it into a long term rental. In Humboldt County the

other reality is that a long term rental has a very high likelihood of being damaged by disrespectful tenants turning it into a marijuana grow house. Many of our STR homeowners have purchased a 2nd home in Trinidad and are using it as a vacation rental to generate income until they are ready to retire to their investment property full time. They would prefer to live in Trinidad sooner but there are not enough jobs to support them living in Humboldt County.

CAPS - I support CAPs as a method of maintain balance between residential, commercial and visitor - serving uses and as a way of preserving community character. However, the method proposed in section 17.56.190 (6.26).F represents a flat number that provides **no growth** as undeveloped lots become developed. Table 2 in the CCC Staff Recommendations notes that there are 32 undeveloped lots between the SR and UR Zones. Not allowing for growth in STR's as land is developed does not make any sense when tourism is the # 1 industry in Trinidad and more visitors are wanting to access our beaches and visit our Coastal Land Monuments, like Trinidad Head every year. I myself live on Berry Road in Trinidad's city limits and this year alone I have seen two vacant lots developed into residential housing in the SR Zone. I think this is fair, balanced and makes good business sense. At some point most markets will reach their own natural saturation point as supply out matches demand without a CAP ever being needed. If the CCC feels a CAP is necessary then I propose a much more lenient CAP of 50% of the housing stock. Currently there are only 6 STR's or 18% of the SR Housing Stock. But with 34 dwellings in the SR Zone and 22 more buildable lots this is an area where I think the most desired STR growth makes sense. Because STR's have the highest and best compliance with the OWTS Ordinance, in general are not big water users and are rented on average 150 nights a year their relative impact to the community and its resources is far less than an average residential household.

STR Standards 17.56.190 (6.26).M -Visitors:

I propose that language be added to allow "gatherings" for up to 20 total people including occupants and visitors to ANY STR on the following holidays: HSU Graduation Weekend, Memorial Day, 4th of July, Labor Day, Thanksgiving, Christmas and New Year's Eve. These gatherings would still be required to follow the noise and parking rules of the STR Ordinance but would allow for a reasonable amount of visitors to gather and have access to our coastal areas on weekends when they have time off and which are our busiest, sell out weekends every year. Gatherings that occur at STR's generally occur on the same holiday weekends that regular residence also host backyard barbecues and family gatherings like on Memorial Day, 4th of July, Labor Day, Thanksgiving, Christmas and New Year's Eve. Other STR Ordinances in California have given this allowance as they recognize that people like to gather to celebrate these occasions and this is a usual residential use.

17.56.190 (6.26).J License Transferability:

I propose that all current STR license holders be grandfathered in and granted a one time transfer whether it be due to a sale or to a transfer to a family member. .

The majority of current STR permit holders have invested in their home being an STR for at least 5 years and many for 10 plus years. To revoke transferability upon a sale or transfer except for an allowance of a transfer to a spouse is a "taking" and unfair to the investors who purchased their home and invested in it also being a business. These STR's have held business licenses for years and when asked to conform to the STR Ordinance they jumped through even more financial hoops to certify their septic, obtain \$1,000,000 liability coverage, pay license fees that are 5 times any other business license in Trinidad. This section of the Ordinance is highly likely to result in a very expensive lawsuit for the city. Not all STR's remain STR's of their

own natural volition. Up until this past year I have managed 5 STR's in the greater Trinidad area that sold and became a full time residence or long term rental, not continued to be an STR. There are a few STR's currently for sale that may convert back to a regular residence regardless of this clause so why risk a lawsuit. When the current moratorium and STR Ordinance did not exclude transferability we had 3 STR's sell and transfer the STR license. This became a hot commodity simply because buyers and sellers knew there may soon be a limit. This naturally increased real estate prices as well. Any new STR license holder will be purchasing or converting their home into an STR with full knowledge that their investment in a permit is NOT transferrable at all. This should help real estate prices remain reasonable compared to non-STR homes.

17.56.190 (6.26).M STR Standards

1. **Transmittal of Rules & Good Neighbor Contract - I propose that a guest signature at the bottom of a Good Neighbor Contract serve as adequate acknowledgement of the rules. I propose striking that guests "lose their security deposit". Remove the requirement that dictates an owner or STR manager meet at least one occupant on the day of their arrival..."**

Asking guests to initial each and every rule of the Good Neighbor Contract or STR Ordinance after signing most management companies 6 page detailed Tenant Agreement (already approved by the city) creates a very inhospitable way of welcoming guests into our homes and city. Owners and STR managers already require guests "click" that they've read and agreed to the rules of the Tenant Agreement which include the STR Ordinance when they book online, then they require they sign and complete a Tenant Agreement including a guest registry with the names and ages of all occupants, vehicle information (make/model and color if known, if not then listing the # of rental cars expected on-site) and # of dogs if staying in a pet friendly home. The Good Neighbor Contract is then posted in the homes. Requiring guests initial each rule of this contract is punitive and impractical. In addition guests booking through third party websites like Airbnb does not allow owner/managers to attach PDFs or allow regular email communications with their guests. They block a lot of communication as a way of retaining their guest's business. On Airbnb we currently ask guests to type in the Airbnb message box that they "acknowledge they've read and agreed "House Rules" which include the STR Ordinance". This is the best we can do to relay and have acknowledgment of this information.

Requiring owner or STR managers hold a security deposit is impractical as not all owners/managers require one and most offer optional damage insurance. The city has a right to fine a guest but they will need to cite them and collect payment just like a parking ticket. In order to do so the city should include language that guests acknowledge that the city has the right to obtain the responsible party's name and mailing address for billing purposes.

Requiring an owner, STR manager or LCP to meet at least one occupant on the day of their arrival in order to ensure once again that the rules are understood is punitive, impractical and unjustified. It is inconsistent with standard STR business practices where guests may arrive at any time usually after 3 pm and obtain keys from a lockbox onsite. Especially in our remote, rural area guests often fly into San Francisco, rent a car and then take their time driving and visiting areas along the way. Flights often get delayed, guests stop to eat or explore and their plans change. STR owners and management companies cannot provide 24 hour staffing to meet and greet guests. There is **no evidence** to support that meeting and greeting guests will result in fewer complaints. In addition there has been **only 1 significant violation this past year** and a statistically insignificant number of complaints over the past few years compared to the thousands of stays at STR's. This is also a very unenforceable rule. If the CCC feels further communication is necessary then I propose owner/STR managers have verbal contact with the responsible party on the day of or within 1 day of arrival to review the key elements of the ordinance: Noise, Occupancy, Visitors. Again, I feel this is unnecessary but may be a reasonable compromise. The "Good Neighbor Brochure" that the city provided to the owners/managers for the current ordinance is inadequate in size, color and format and is totally inadequate for

capturing guests attention to the rules. **Instead I propose the city provide STR owners/managers with a 81/2 X 11 poster that the city require be framed and hung in the STRs with the key elements of the ordinance in bold, bulleted and colorful fashion that also includes the penalties for guests violating these rules.**

3. Number of Occupants - I propose continuing with the existing occupancy rules of the current STR Ordinance which allow 2 guests per bedroom plus 2 guests and striking the exception that in the UR Zone on lots less than 10,000 sq. ft. in area the maximum occupancy is 2 people per bedroom and striking the SR Zone square foot requirements.

The city's current General Plan Visitor Accommodations section (developed in the 70's) reads as follows, "In the City there are 2 RV parks, an older establishment on Main St. and a newer, larger park just east of the freeway interchange. On Patrick's Point Drive there are numerous motels, cabins, RV parks, and camping site complexes. Some were developed 20 years ago. Of the 330 visitor accommodation units in the planning area more than 2/3 are located on Patrick's Point Drive. Several regular visitors indicated more modern accommodations are needed. The need for visitor accommodations is estimated to be equivalent to the number of mooring spaces provided in the harbor. With the current number of moorings limited to 400 there is a need for 75 - 100 additional visitor accommodations. If the number of mooring spaces is increased in the future then an equivalent number of visitor accommodations will be justified. Most of the visitor accommodations are occupied by fisherman who indicated a preference for additional RV parks. "

4. Visitors- I propose adding to this section an allowance for up to 20 people total allowed on holidays including HSU Graduation weekend, Memorial Day Weekend, 4th of July, Labor Day, Thanksgiving, Christmas, and New Year's.

5. Guest Registry - I propose striking the section that requires collecting vehicle license plate numbers and instead ask for the # of vehicles that the occupants will have onsite. The majority of guests rent vehicles and have no idea what the license plate number will be. We require guests to sign the Tenant Agreement (including STR Ordinance rules) and include a guest registry prior to their arrival and before we release the lock box key code to the STR. Asking for the # of vehicles expected on-site is easy information to collect and is easily enforceable. If a guest says they are going to have 2 cars parked on-site and after 11 pm we receive a complaint that there are 5 cars onsite we can notify guests of their violation.

17.56.190 (6.26).P Dispute Resolution - I propose striking "including engaging in mediation, at owner's expense." If dispute resolution is warranted then the expense should either be paid for by the city from the TOT taxes collected or as a shared expense between the owner/manager and the neighbor. There are a handful of residents in Trinidad who loathe vacation rentals and will do next to anything to try and shut them down. We have received threats from neighbors that they will file complaints every time something bothers them even before trying to contact us first to resolve an issue. Mediation is a shared process and every person involved needs a stake in the game in order to come to resolution.

17.56.190 (6.26).R- Fines - This section is not well defined and does not clarify WHO will be fined. Is this fine directed at gross negligence of an owner or STR manager or a violation of the guest. Under section STR Standards - Transmittal of Rules & Good Neighbor Contract it states occupants can be fined by the city. So I propose this section restate just that. The fines are excessive and inconsistent with any other fines for ordinances in Trinidad. How will the city impose these fines and collect from the guests?

17.56.190 (6.26).R Significant Violations - I propose changing this section to read "A significant violation MAY be a situation...." and change word "rectify" to "respond" to a situation. I also propose

changing the time frame for response from 30 minutes to 45 minutes as a more reasonable time frame.

Despite an LCP living within a 20 minute distance of Trinidad, it takes time when being awakened by a complaint call to get dressed, log onto a computer and get the necessary reservation information, then drive to Trinidad to address the situation. The way this section is written a neighbor can simply call the Sheriff because they think an STR is noisy or is having a party and it will be considered an automatic significant violation. If a neighbor does this twice then under section **4.Revocation** the STR permit may be revoked. Then under section **7.False Reports and Complaints** there is NO penalty related to neighbors making false reports. This entire **Violations Section** aims to penalize the STR Owner or manager and does little to penalize the guest whose behavior may be violating the ordinance or on the neighbor who is simply vehemently opposed to STR's and wants to complain or call the Sheriff simply as a means to shut an STR down.

17.56.190 (6.26).E Application Requirements Section 2. Contact Information subsection C. Distribution of Contact Information- I propose clarifying the language that states, "If there is an emergency or complaint, and the LCP does not respond within a reasonable period of time, to be consistent with the 30 minute time frame stated under section a. LCP that requires a **"personal response within 30 minutes"** before a concerned person will be encouraged to report and emergency through the 911 emergency calling system or the Police or Sheriff's Department for other complaints.

The city of Trinidad gutted a perfectly good STR Ordinance that had only been in effect for approximately 3 months before they issued a moratorium on STR Permits with the primary goal of establishing a cap or limit for future STR's. They then began completely rewriting the entire STR Ordinance without ever giving it a chance to be fully implemented and evaluated. There are a handful of citizens in Trinidad who are vehemently opposed to STR's and will stop at nothing to try and shut them down. It is my sincerest hope that the commissioners will endorse a more fair and reasonable STR Ordinance then the one presented and that it includes a percentage CAP that supports long term growth and maximizes visitor access to our coastal monuments and beaches. Trinidad already has the strictest STR Ordinance in all of Humboldt County with the most regulations and provides the majority of STR's with coastal access in the county. Please help us keep Trinidad a friendly place to do business as lodging operators and a hospitable environment for our visitors by not endorsing the STR Ordinance as written.

Sincerely,

Jonna and Reid Kitchen
Owners, Trinidad Retreats

From: [REDACTED]
To: [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Upcoming Coastal Meeting Re: STRs in Trinidad
Date: Friday, May 26, 2017 8:45:47 PM

Dear Melissa Kraemer,

It has come to my attention that there is a meeting regarding STRs in Trinidad, Ca. I feel that I am a good observer of the rental situation in this area because my family has rented a home through Trinidad Retreats for at least 15 continuous years. Prior to renting, we sought out inexpensive motels. Our experience with this rental agency has been nothing but sterling. I have read the documents regarding this meeting and feel that I should respond. Renting a fully cared for home is the only way a family like mine can enjoy a wonderful yearly vacation with amenities that we would not be able to buy for ourselves. We understand that the Coast belongs to us all to benefit from its beauty. I find it offensive that some in the community label visitors as tourists that "disturb the peace and quiet. That's what we are there for too! My experiences shopping at the local stores or dining out indicate that many visitors that impact the community are there from their camping spots or mobile home parks or are passing through. STRs usually use their homes as much as possible and aren't milling around the community. I have seen a much larger number of homeless hanging around also. When we sign a contract to stay in a home there are increasing stipulations on staying there. They are becoming more rigid and frankly it makes us feel less welcome. Trinidad Retreats monitors and requires a standard of behavior and we sign contracts to agree to their rules. If rules are not followed, we can be asked to vacate.

We know our dollars spent there help the community and we are happy to contribute in all ways by grocery shopping, meals out, and fishing trips.

I do support limiting the number of rentals in Trinidad proper. Perhaps a ratio of 2 out of 10 houses would be acceptable to all involved.

In closing, I hope the community realizes that we respect the area. It is sad that a few people can spoil it for so many.

Sincerely,

Steve and Randi Blake
2620 Somerset Circle
Woodland, Ca 9577
530-668-7959
916-835-1035

From: [REDACTED]
To: [Dettmer, Alison@Coastal](mailto:Dettmer.Alison@Coastal); [Merrill, Bob@Coastal](mailto:Merrill.Bob@Coastal); [Kraemer, Melissa@Coastal](mailto:Kraemer.Melissa@Coastal)
Subject: Trinidad LCP Amendment No. LCP-1-TRN-16-0065-1 (Short Term Rentals) For the Commission meeting of June 8, 2017 in Arcata
Date: Sunday, May 21, 2017 12:18:00 AM

Dear Ms. Dettmer, Mr. Merrill and Ms. Kraemer: (PLEASE FORWARD TO THE COASTAL COMMISSIONERS FOR REVIEW)

After reviewing the staff report re: the above LCP Amendment, I am very disappointed that not one single recommendation made by Saving Trinidad Neighborhoods (STN) was incorporated into Trinidad's STR Amendment (Amendment). Instead the Amendment, which has numerous flaws, is recommended for approval by CCC staff, as submitted. STN put an incredible amount of time and energy into submitting a letter and memo to Mr. Merrill (see [comments letters](#) in staff report) and a large binder filled with back-up materials about the well-documented problems with STRs in Trinidad and the need for tighter controls on what are, essentially, full-time commercial businesses in residential neighborhoods. Unfortunately, even though members of our group worked incredibly hard to come up with Amendment language that was fair and less ambiguous and would better protect the residents and community, it seems our recommendations were completely dismissed.

While the Preamble, Findings and Purpose of the Amendment sound good, the actual language governing STRs is, in many sections, poorly written, confusing and lenient in a way that unfairly favors STR owners/operators. For example, the section on off-street parking says: *"Occupants will be required to utilize onsite parking prior to utilizing offsite and on-street parking as part of the rental contract but are not allowed to park onsite in undesignated parking spaces. Occupants and visitors shall be encourage to not take up all of the available street parking of adjacent and nearby properties."* Confusing references to different types of street parking makes this regulation difficult to decipher and enforce. We thought the purpose of off-street parking was to free up public street parking for coastal access purposes, but City staff have offered excessive numbers of parking exceptions (5 to one on Ocean Avenue) even though there are known parking problems on that particular street.

Many sections of the Amendment are more confusing than the original Ordinance. Several of the regulations are loosely written in ways that allow STR owners/operators to maximize the use of their STRs, sometimes in illegal ways, such as converting single-family homes into duplexes by adding unpermitted, second kitchens or by using detached buildings as extra STR bedrooms or illegal second STRs, even though the regulations clearly state only one STR is allowed per parcel.

Basic definitions like bedroom and kitchen are missing from the Amendment. If it is truly the intent of the Amendment to strike a balance between visitors and residents and protect the residents' rights to the peaceful use and enjoyment of their homes, terms like "bedroom" and "kitchen" should be included to prevent STR owners/operators from converting non-bedrooms into bedrooms and adding second kitchens or kitchenettes for the purpose of illegally converting single-family homes into duplexes. That is why our group asked for those definitions to be included; to prevent STR owners/operators from taking advantage of undefined terms and maximizing occupancy of STRs in ways that harm residents and the community.

Since Trinidad has ongoing problems with STR owners/operators making illegal modifications to STRs after the initial inspection is done, it seems that a simple requirement for an annual inspection would go a long way to insure STRs are in compliance and have not been modified or altered in ways that violate City codes/regulations. I am asking the Coastal Commissioners to please consider including an annual inspection requirement in the STR Amendment.

Another section of the Amendment we felt deserved attention was the maximum 20-person allowance. If all of the STRs in Trinidad (35) hosted 20 people, 700 more people would be coming into residential neighborhoods and impacting the peace and quiet of residents. If only the renters of STRs were allowed on the property (i.e., a 2-person-per-bedroom allowance), this would alleviate a lot of conflicts due to overcrowding of properties and streets and turning coastal communities into "party towns." Full-time residents are not likely throwing parties on a daily or weekly basis, but STR renters do throw parties, because they are on vacation and want to have fun. I am asking the Coastal Commissioners to please consider the very real impacts of allowing up to 20 people to visit STRs. Again, if it is the true intent of the Amendment to strike a balance between visitors and residents and to protect the rights of residents and the community, it seems reasonable to ask that STRs be restricted to the renters of the property.

I do not understand why the Trinidad Planning Commission would be allowed to grant exceptions for additional STRs when a cap has been established. One of the main reasons the City Council petitioned the CCC to rush their approval of the Amendment was their concern a cap would not be in place when the moratorium was up this coming June. It seems odd that the cap could simply be undone if someone requests an exception for an STR, as that would contradict the desire for a cap to control the proliferation of STRs and need for a moratorium. I know from experience, the Trinidad Planning Commission and City Council rarely, if ever, say no to exception requests, so it is likely the cap will become a token gesture of controlling STRs in Trinidad.

It is hard to imagine that full-time residents use an average of 150 gallons of water per day per bedroom (or **7,324 cf of water per year per bedroom**). Just for comparison, my husband and I lived in a 3-bedroom home in Trinidad on a 1/4-acre lot for 8 years. On average, we used 250 cf of water per month, or 3,000 cf per year. If we used the amount of water allowed under the Amendment, we could have, theoretically, used 21,972 cf of water in our home, plus an addition 30% for landscaping purposes! I have talked to my many friends in Trinidad, and none of them come close to using the amount of water that STRs are allowed to use.

All of the past geologic studies prepared for Trinidad by Busch Geotechnical and other geologic firms say that a high-water table is one of the single greatest threats to Trinidad's bluff instability. When you see what is happening to the Memorial Lighthouse bluff, it seems reasonable to believe that the bluff has been compromised, through the years, from excessive water usage by nearby businesses/STRs/homes. Add in this year's record rainfall, and it seems like a recipe for bluff failure, as the bluff never has a chance to dry out. Once the winter rains are over, the tourist season begins, which means that the high-water usage at STRs begins, too. Again, it seems that allowing such a permissive water allowance for STRs (including the 30% additional allowance for landscaping) is not helping the stability of the bluffs in anyway and is actually impacting these coastal resources. That is why I believe there needs to be stricter controls on water usage by STRs.

I would like to encourage the Coastal Commissioners to consider adding more protective language about the proper treatment of hot tub water. The City's OWTS Questionnaire does not provide specific information about where STR owners/operators are draining their treated hot tub water. Since Trinidad Bay is an ASBS, it seems that close attention should be paid to the fact that numerous STRs with hot tubs are situated above bluffs or near streams, such as Parker Creek or Mill Creek, and that treated hot tub water that is drained onto the ground could be making its way into nearby streams and Trinidad Bay.

None of us expected that all of STNs recommendations/edits would be included in the Amendment. But we were shocked to see that none of our recommendations were included, as we felt we submitted very legitimate and well-written suggestions to improve the governability of STRs and clarity of the language. My above comments are just a sample of the concerns that were expressed in STNs letter and memo to local CCC staff this past January. I am hoping that the Coastal Commissioners will review our well-thought-out comments and consider incorporating some of our suggestions into the Amendment to make it more fair and equitable.

Sincerely, Kimberly Tays
A concerned citizen residing in Arcata, CA (formerly a Trinidad resident)

RECEIVED

JAN 23 2017

MEMO

CALIFORNIA
COASTAL COMMISSION
NORTH COAST DISTRICT

TO: Bob Merrill, North Coast District Office, California Coastal Commission

FROM: Saving Trinidad Neighborhoods,

DATE: January 23, 2017

RE: Local Coastal Program Amendment Application No. LCP-1-TRN-16-0065-1 to Amend Regulations for Short Term Rentals

Saving Trinidad Neighborhoods (STN) is submitting the following edits and/or changes regarding the above Amendment. We feel the Amendment is equally as vague and ambiguous as the existing Ordinance and needs to be revised for clarity to provide more balanced protections for residents, the community and coastal resources.

17.56.190 (6.26).D Definitions

The following are definitions we suggest be deleted from or added into the Amendment for clarity and consistency purposes and to minimize impacts of STRs in Trinidad.

1. Remove the definition for "Dwelling" and replace with the following: *"Dwelling Unit" is a single unit containing complete, independent living facilities for a person, persons, or a family, including permanent provisions for living, sleeping, eating, cooking and sanitation, and having only one (1) kitchen, not to include mobile homes in a mobile home park.*

Reason: The amended definition for "Dwelling" is too vague and ambiguous. It would legally allow STRs owners to create multiple households, as cooking facilities and living quarters could be increased in single-family homes throughout Trinidad, causing overcrowding of properties, streets, and altering the residential character of Trinidad's neighborhoods. This would lead to an increase in the intensity and density of use of many properties in Trinidad.

2. Add a definition for "Bedroom." "Bedroom" shall mean a room that can be used for sleeping purposes having minimum widths of 7 feet and having a closet that is built into a wall, excluding bathrooms, kitchens, living rooms, dens, and laundry rooms.

Reason: STR owners are violating the existing Ordinance by converting every manner of rooms (living rooms, dens, lofts, detached studios, converted garages) into sleeping rooms. Non-bedrooms are being turned into bedrooms by using furniture that can be converted into beds (sleeper couches, futons, fold-up pads). Due to the plus-2-person allowance, bedrooms are being furnished with more than one bed to maximize occupancy, which increases the intensity and density of use of properties in Trinidad.

3. Add the following definition for "Kitchen or Kitchenette." *"Kitchen or Kitchenette" means any room or portion of a building used or intended to be used for cooking or the preparation of food, whether the cooking unit be permanent or temporary and portable, including any room having a sink and cooking stove that has a flat top with plates or racks to hold pots or pans or utensils over flames or hot coils.*

Reason: See our explanation above regarding "Dwelling Unit."

4. Add the following definition for "Second Residential Dwelling Unit." *"Second Residential Dwelling Unit" means either a detached or attached dwelling unit that provides complete independent living facilities for one (1) or more persons. It shall include permanent provisions for*

living, sleeping, eating, cooking and sanitation on the same parcel or parcels as the primary unit is situated.

Reason: STR owners/managers are converting converted garages and studios into extra bedrooms for STRs and, thus, increasing the intensity and density of properties in Trinidad.

5. Add the following definition for "Single Unit Rental be added to Amendment." *"Single Rental Unit" means the use of an attached or detached structure which is used as a visitor serving unit and which is operated in conjunction with a residential use or commercial use, as a short term rental for transient occupancy, for a fee charged, and subject to Uniform Transient Occupancy Tax.*

6. Add a definition for Provisional Permit." We do not have suggested language for this term, as we do not know what it means.

Reasons: "Provisional Permit" is noted on many STR applications/renewals; however, it has never been defined in the STR Ordinance. For the sake of consistency and transparency, this term should be defined.

7. Add a definition for "Bed and Breakfast (B&B)." We do not have suggested language for this term.

Reason: Without a definition for B&B, the STR Ordinance is ambiguous. We need to clarify the difference between an STR and a B&B.

8. Under the definition for "Occupant," remove the following language: *"occupant does not include up to two children aged 12 or under."*

Add the following language: *"Occupant" means any person who exercises occupancy or is entitled to occupancy by reason of concession, permit, right of access, license, or other agreement for a period of twenty-nine calendar days or less, counting portions of calendar days as full days. The term "Occupant" shall be synonymous with "short term" when used in the context of residential use.*

Reason: All occupants must be counted. Children, regardless of age, contribute to overcrowding of properties, noise, water use, trash, etc. There is no code enforcement to determine the age of occupants. This creates vagueness in the Ordinance and allows additional occupants without oversight or enforcement to prevent overcrowding of STRs. It is important to reduce occupancy in STRs to minimize impacts to residents.

9. Remove the term "Resident STR" and consider the following concept: STN would like STRs to be Primary Resident Only (PRO) with 90-day maximum rentals per year, because this would insure visitor access while preserving the rights of all residents in residential zones to rent their homes during the year. Currently, with caps, only certain residents are allowed to rent their homes all year around, meaning a certain population of people are excluded from the right to rent their homes if the cap has been met. Residents living in between STRs should not be excluded from renting their homes as STRs. We would like year-round commercial STRs to be phased out and replaced with 90-day maximum rentals per year that would provide visitor services and also protect the interests of all residents, the community and coastal resources.

10. Remove the definition for "Visitor."

Reason: STRs should be for paying STR guests only. Allowing large numbers of visitors to STRs creates enforcement problems which are not provided for in the Ordinance. Lack of code and law enforcement must be considered. By allowing large groups of people, day in and day out, STR

owners are essentially turning their properties into "party places," which exacerbates existing problems with parking, noise, dogs, high water usage, over-taxed septic systems, and a general overcrowding of properties and neighborhoods. Frequent parties at STRs, because of the large number of guests/visitors that are allowed, creates a nuisance for residents. Requiring that STRs be used only by the renting party would minimize the impacts of STRs on residents, etc.

STN believes larger STRs should be required to get a coastal development permit (CDP), due to increases in intensity and density of use of the property. According to the 2010 U.S. Census, the average family size in Trinidad is 2.64. If an STR doubles the average household size in Trinidad, then it should require a CDP. Residents that live next to these properties should have the right to participate in the permit process so they are informed about the details of the operation, including what exceptions, grandfather allowances or conditions that have been placed on the property.

11. Under Section 17.56.190 (6.26).E - Application Requirements and Initial Application, page 5, the following revisions, additions or deletions should be made to the Amendment:

Re: Paragraph b., on page 5, add the following language re: site and floor plans: *A site plan and floor plan must be submitted with the STR License application so the City (and public) can verify the number of bedrooms, off-street parking spaces, kitchens, and other requirements. The site plan and floor plan should be prepared in a neat and clearly prepared manner and must be to scale so that the average person can easily decipher the layout of the property and the information provided to verify compliance. If the site plan or floor plan are not to scale or are drawn free-hand in an illegible or unclear manner, they will be rejected and the STR License application will be invalid.*

Reason: STR owners are submitting site plans and floor plans that are hand-drawn, barely legible and not to scale. For transparency and clarity, STR owners should not be allowed to submit illegible or incomplete site and floor plans.

Re: Paragraph c., on page 5, add the following language re: building inspections: *At the time of the initial application and then with each annual renewal of an STR license, the STR owner or manager shall allow the building inspector onto the property to conduct an inspection to insure the STR is in compliance with the STR Ordinance and building and safety codes. These inspections shall also be conducted for the purpose of insuring STRs have not been modified or altered or are operating in a manner that violates regulations and codes. If the building inspector determines that an STR is not in compliance or that unauthorized modifications or alterations have been made, then the STR owner's license can be suspended or revoked if the owner fails to bring the property into compliance with City regulations and codes.*

Reason: All STRs should have **annual inspections**. Currently, inspections are conducted only at the time of the initial STR application. Due to problems with STR owner/managers making modifications and conversions to their properties, annual inspections should be performed to insure the STR continues to operate in a manner that does not violate City's codes and regulations.

Re: Paragraph e., on page 5, add the following language re: information to be provided to property owners within 300 feet of an STR: *The City of Trinidad shall notify all property owners with 300 feet of an STR property of the STR License within 10 working days of its issuance or reissuance and provide the following information: (1) maximum number of occupants permitted to stay in the STR, (2) maximum number of vehicles allowed on the STR property, (3) any special conditions or restrictions to the STR permit, (4) how to obtain a complete copy of the permit, (5) the name of the owner (for a hosted accommodation) and the authorized agent (for a non-hosted accommodation) of the STR and the telephone numbers at which the owner (for a hosted accommodation) and the authorized agent (for a non-hosted) may be reached 24-hours a day, (5) the City of Trinidad Enforcement telephone number that public members can call to report violations*

for each additional 500 square feet of floor area above this total, one additional occupant may be allowed, up to a maximum of two additional occupants. Where it can be determined based on the Humboldt County Division of Environmental Health permit or file information or an actual inspection of the system, the number of bedrooms will be based on the design capacity of the septic system.

Reason: This paragraph is vague, ambiguous and hard to enforce. Septic systems are being used to surpass the number of bedrooms permitted. For example, if a larger septic system is installed on the property, it currently does not limit occupancy and, instead, increases occupancy (i.e., Paloma Creek Lodge and Pacific Heights). For example, in 2012 when Paloma Creek Lodge was licensed as an STR, the stated number of bedrooms was 3. The property is now considered a 5-bedroom STR due to septic improvements and has avoided the permit process. Also, Pacific Heights on Wagner Street was a 2-bedroom home when it was originally permitted, but now, because of septic system improvements, it operates as a 3-bedroom home. Increasing the number of bedrooms has allowed the STR owners to greatly increase occupancy.

Modifications to septic systems that allow an increase in bedrooms for STRs must go through the coastal development permit process (CDP), as increasing septic capacity increases the density and intensity of use of the property. Occupancy should be based on the number of bedrooms and not on the design capacity of the septic system.

Regarding the following language (see Number of Residents, page 8): *“Except that in the UR Zone, on lots less than 10,000 sq. ft. [...]”*

STN Comment: This appears to be spot zoning for Paloma Creek Lodge, because it is the only lot in the UR zone of this size, that we are aware of. Other criteria should be considered, such as whether a property is compatible with the neighborhood, narrow roads, parking availability, environmentally sensitive areas. Spot zoning for a property of this size, appears to be a change in land use and increases the intensity and density of use of the property.

Re: 4. Visitors, page 9: This entire section should be deleted.

Reason: Only STR renters should be allowed on STR property. Allowing up to 20 combined occupants and visitors on the premises at any time, causes homes to be turned into “party places.” Essentially, parties this size could be held day in and day out and create enormous stress on residents and interfere with the peaceful use and enjoyment of their homes. There is no City enforcement officer or law enforcement available to respond to complaint or problems on nights, weekends, holidays or during large community events (Fish Festival, Clam Beach Run, HSU graduation).

Re: 6. Off-Street Parking, page 9: This paragraph should be revised, as it is vague and ambiguous.

Add the following language: *The STR licensee/permittee shall limit the number of vehicles to the number of bedrooms listed in the STR, and overnight guests shall utilize designated off-street parking spaces. The STR licensee/permittee shall provide access to the garage of the residence if that area has been included in the number of available off-street parking spaces provided on STR applications. Specific measurements for on-site parking is as follows: (1) must have 8 feet, 6 inches x 18 feet per exterior space and 8 feet, 6 inches x 19 feet for enclosed spaces; (2) two-car garages must have minimum 17 feet x 19 feet clear space for parking; and (3) all designated spaces shall be available for the occupants.*

Delete the following language: *Occupants will be required to utilize onsite parking prior to utilizing offsite and on-street parking as part of the rental contract but are not allowed to park onsite in*

undesignated parking spaces. Occupants and visitors shall be encouraged to not take up all of the available street parking of adjacent and nearby properties.

Reason: The above paragraph is confusing. Interchangeable terms like "on-street," "off-street," "onsite" and "offsite," are vague and ambiguous and do not provide resolution for parking overages. Such convoluted language makes enforcement impossible. The language also allows parking exceptions to remain in place without further review of ongoing and cumulative impacts to residents and the community. Parking exceptions should not be presumed to be renewed annually and, instead, must be reviewed at the time of the STR renewal, at a publicly held meeting of the Planning Commission, to determine whether it is appropriate to extend those parking exceptions. Any further decisions to allow or disallow parking exceptions can be appealed within ten (10) days of the Planning Commission's decision on parking exception renewals. Currently, City staff are granting parking exceptions when STR properties have inadequate off-street parking. The overuse of parking exceptions should be evaluated by Coastal Commission staff, as they are creating a nuisance in neighborhoods and impacting the community with parking overages that knowingly interfere with public access for day-use visitors and residents, alike.

Re: 7. Water Use, page 9, the following language should be deleted: *Where it can be determined based on the Humboldt County Division of Environmental Health permit of file information or an actual inspection of the system, the number of bedrooms will be based on the design of the septic system.*

Reason: Water usage limits for STRs must be based on the average monthly water usage (in cubic feet) for Trinidad households. Allowed flexibility for landscape watering for various-sized lots creates excessive water usage. Overuse of water should constitute a violation in the enforcement of STRs and require there be an immediate reduction in water usage or occupancy of that particular STR. If the STR meets the standards for average monthly water usage of full-time residents during the year, increased occupancy may be reconsidered. Water usage must be monitored quarterly to compare average monthly water usage of STRs with full-time Trinidad households. It is apparent from review of City records, that many STRs are using excessive amounts of water and those water usages need to be reviewed by Coastal Commissions staff to insure protections of coastal resources.

Re: 8. Septic System, page 9:

STN Comments: Septic systems not in compliance with the STR Ordinance should not be offered renewals or exceptions/provisional licenses to operate. Septic systems should not be enlarged to allow STR owners to increase capacity of an STR rental above what the original home was permitted on the building permit with regard to number of bedrooms.

Re: 12. Traffic, page 10:

STN Comments: Because there have been no traffic or parking studies, and no quantifiable comparisons completed by the City, the section on "Traffic" is meaningless and unenforceable. STRs with occupants and visitors create parking and traffic hazards on the small, narrow/gravel streets in Trinidad. Traffic and parking surveys must be completed to determine what "normal residential levels" are compared to "existing legal standards." This information is necessary in determining what traffic levels constitute a nuisance in neighborhoods.

Thank you for your consideration of our input on this important issue.



City of Trinidad

March 8th 2017

Robert Merrill
North Coast District Manager
California Coastal Commission
1385 8th Street #130,
Arcata, CA 95521

RECEIVED

MAR 20 2017

**CALIFORNIA
COASTAL COMMISSION
NORTH COAST DISTRICT**


Dear Mr. Merrill:

The City of Trinidad appreciates the Coastal Commission's role, and you and your staff's role, in reviewing our Short Term Rental Ordinance and ensuring it is consistent with the California Coastal Act. We understand that you expect to take the Ordinance to the Commission at their June 2017 meeting in Eureka. The City's current moratorium on new Short Term Rental Licenses expires at the end of June, and we are committed to doing all we can to have the new Ordinance certified by that date. We respectfully ask for your assistance in achieving that goal.

The simplest approach would be if Commission staff decides that the STR Ordinance is ready for certification as submitted. The City very deliberately sought out and incorporated input from you and your staff throughout our process to ensure that the Commission's certification of the Ordinance could go as smoothly as possible. The City was greatly encouraged by the recent Commission guidance letter on STR regulation provided to local planning agencies, because we are confident that the approach we have taken in drafting our STR Ordinance is entirely consistent with that guidance from your own agency. We have worked hard to craft a balanced Ordinance that addresses the real impacts that STRs can have on our residents and the character of our City, without going so far in limiting the coastal lodging opportunities that STRs provide in Trinidad as to run afoul of the Coastal Act.

If you determine that changes are in fact needed, we ask that you please provide us your recommendations as soon as possible. If we receive them in time, the City may be able to consider adopting a revised version of the Ordinance that incorporates your changes, and resubmitting that version to you ahead of the June meeting, so that the Commission's action in June could include the final certification of the Ordinance.

Thank you for your consideration of this request. We look forward to working with you to complete this process and see all our efforts on this important issue put into effect.

Sincerely,

Dwight Miller
Mayor of Trinidad

January 24, 2017 **(This Letter Replaces Original Letter Dated January 23, 2017)**

Mr. Bob Merrill, District Manager
North Coast District Office
California Coastal Commission
1385 8th Street
Arcata, CA 95521

Re: Local Coastal Program Amendment Application No. LCP-1-TRN-16-0065-1 to Amend
 Regulations for Short Term Rentals (STRs)

Dear Mr. Merrill:

Saving Trinidad Neighborhoods (STN) is a group of community members that have come together because of our shared concerns about the impacts of converting a high percentage of residential homes into year-round commercial businesses (STRs). We do not believe these rentals are compatible with the residential character of Trinidad's neighborhoods for a variety of reasons presented in this letter.

Our group has attended the majority of City-sponsored meetings and presented oral and written testimony regarding our concerns about STRs. We have also submitted numerous complaints and appeals about non-compliant STRs. **(See Tab 1 for Resident Complaints.)** Unfortunately, our efforts have done little to alleviate the multi-faceted problems with STRs. Further below, we have highlighted five of the most problematic STRs and listed their specific problems.

Part of the problem with regulating STRs is that Trinidad (City) does not have a code enforcement officer or a full-time police department to respond to STR complaints. During tourist season, especially on weekends, holidays and during HSU graduation, STRs are heavily occupied and renters oftentimes host large parties. With a lack of police presence and limited staff resources, residents are burdened with policing their neighborhoods. Complaints have been written and verbally expressed to City staff/officials about excessive noise, trash, visitor and parking overages, traffic congestion, large weddings and marijuana groups holding unauthorized events, dogs running loose, illegal second units being rented, more than one STR per parcel being rented, single-family homes being converted into duplexes (with second kitchens), and detached buildings being rented as extra STR bedrooms.

While the VDU Ordinance (Ordinance) was written to minimize problems with STRs, City records clearly show a high percentage of STRs are not complying with regulations. This laissez-faire attitude of the City is creating conflicts in the community. STR owners/managers know they can ignore rules, with little or no consequences, and residents are frustrated because the same problems persist without resolution. Because Trinidad is a small community and homes are close together, high numbers and concentrations of STRs are negatively impacting the quality of life for permanent residents and adversely altering Trinidad's small-town character.

Because Ordinance regulations are not being implemented effectively, consistently or transparently, we believe Chapter 3 of the Coastal Act is being violated, due to impacts on public access from overcrowded properties and streets and the possibility that environmentally sensitive areas are being impacted from water overages, over-taxed septic systems and treated hot tub water that is likely being drained onto the ground near streams and bluffs.

The actions taken by City staff are clearly biased towards allowing STRs to operate in ways that are detrimental to residents and adversely effect the community. Instead of working to resolve STR compliance problems, City staff advocate for STR owners/managers by introducing policy changes that will allow them to enlarge their operations. This advocacy is apparent when reading the

extensive number of emails that are part of the March 29, 2016 Appeal regarding the City Manager's decision to permit business licenses for STRs that were not meeting City Ordinance requirements or building codes. These emails, acquired through a public records request, paint a clear picture of the inordinate amount of time and effort the City manager/planner have spent crafting justifications to grant exceptions and grandfather status to properties that do not meet parking, water usage and septic system requirements, and that allow STR owners/managers to rent un-permitted units, use detached buildings as additional bedrooms, convert single-family homes into duplexes (with two kitchens), and to rent more than one STR per parcel. The irony is, during the same time, City staff repeatedly told residents that the City does not have the resources to investigate non-compliant STRs. **(See Tab 2 for 3/29/16 Appeal and various emails.)**

Questionable decisions by the City manager/planner to renew licenses and grant exceptions and grandfather status to so many STRs have not been properly evaluated with respect to cumulative impacts on the community. Furthermore, we found no substantive findings to support these exception/grandfather decisions.

In reviewing City files and the websites advertising Trinidad STRs, we learned a majority of STRs are out of compliance in some way. Residents are frustrated with the City's failure to enforce STR regulations in a fair and transparent manner. It appears that whenever an STR owner/manager complains about a restriction in the Ordinance, the City manager/planner use their positions to grant questionable exceptions or grandfather status to allow the owner to maximize the use of the STR even if it disregards the letter and spirit of the Ordinance, which was designed to minimize impacts to residents, the community and coastal resources.

To help Coastal Commission staff (CCC staff) understand the myriad of issues with STRs, we have summarized five of the most problematic properties, below.

Paloma Creek Lodge on Parker Creek Drive: This STR is advertised as a *"3,550 sq. ft. 4 bedroom home, plus 400 sq. ft. optional king studio (sleeps 3 & is an additional fee to add on; the entire property has a limit of 12")*. The property is situated in an environmentally sensitive area, with Parker Creek below. This property owner has increased the number of bedrooms from 3 to 5 without permits and, in 2014, was reported to have two dwellings even though this property is zoned for a single-family residence. These changes occurred without City approval and increase the intensity and density of use of the property and violate City regulations and the Land Use Plan (LUP).

With 5 beds in the main house and 3 beds in the detached studio, the STR actually sleeps 14, even though the License Renewal Application (renewal) says there will be a maximum of 12 occupants. Because this STR is allowed to have 20 people on the premises, guests often have large parties. This has created traffic congestion, parking overages **(see photos in Tab 3)** and trash problems. Guests and their visitors often park on the gravel road that is co-located with the Parker Creek Trail. Residents have encountered cars blocking the trail and had to ask vehicle owners to move their cars so they could access the trail to the beach. The Lodge also has a hot tub, but it is not clear where the treated hot tub water is being drained. If treated water is drained onto the ground, it could make its way into Parker Creek and Trinidad Bay, which is an Area of Special Biological Significance. On the Operating Permit for the septic system there is a note that says *"Nonstandard system inspection must evaluate pump components and pump chamber."* However, we found no records to indicate an inspection was ever performed.

Despite Ordinance language in section 17.56.190 (6.26).F of the existing Ordinance that says *"There shall be no more than one VDU per parcel,"* this STR owner is renting the detached king studio as an extra bedroom for the STR and, at times, rents it as a long-term rental. This makes enforcement of this STR difficult.

The City's 2016 water chart shows high water usage for this STR—1,193 cf for June, 1,420 cf for July and 1,267 cf for August. Because of the numerous amenities on the property, including a hot tub, fire pit, large entertainment room with bar, pool table, outdoor ping pong table, foosball table, and an outdoor shower, it is no surprise this property is creating problems in the community. Due to its size and the number of amenities, we feel this STR should require a coastal development permit (CDP), especially when it is located in such an environmentally sensitive area. **(See Tab 3 for information on Parker Creek Lodge.)**

Retro Retreat on Ocean Avenue: This STR is being advertised as a 3 bedroom home that sleeps 8. However, it has the potential to sleep 12, if the converted garage is used as a guest cottage. There is also an upstairs loft **(see photos in Tab 4)**, that was not included in the floor plan, that has the potential to sleep even more guests. Complaints have been brought to the City for over two years about the converted garage being used as a second dwelling unit.

While this STR has the potential to sleep 12+ people, there is no off-street parking on this property, even though the renewal application says there are “5 off-street parking spaces.” Instead of asking for the occupancy to be reduced to alleviate parking problems, the City planner/manager **granted 5 parking exceptions**, knowing there have been complaints about parking overages and that the exceptions would likely create a further nuisance to residents. One email from the City Manager to the City Planner says “[I]f all the VDUs on that street were at max occupancy, and used the street as primary parking—how many of the total spaces are used up by VDU cars? 4 for McCarter, 4 for Reinman, 4 for Vallee's on the corner? Plus the renters on the other side of Tom and Kathleen have more than 4 cars most of the time — seems like this is the kind of nuisance impact that the Ordinance is supposed to be addressing.” When this street is already so heavily impacted with STRs and has a known shortage of parking, this begs the question: **Why did the City manager/planner grant 5 parking exceptions?** In addition to the parking exceptions, the City manager/planner are also currently working to grandfather in the second dwelling garage conversion, which would likely create more parking problems. **(See Tab 4 for information on Retro Retreat; particularly the yellow paper-clipped pages.)**

Fisherman's Escape on Underwood Street: This STR is advertised as a “2700 square foot home ... that can comfortably sleep up to 10 guests!” with a “downstairs den complete with it's own kitchen.” But the renewal for this STR says the maximum number of occupants is 8, and the interior square footage is 3,225. The floor plans submitted to the City do not identify a kitchen, even though the website advertises a kitchen in the downstairs den. The Operating Permit for the septic system says it is designed for 3 bedrooms; however, the home is advertised to sleep 10, which means it is being used as a 4-bedroom home. The City's 2016 water chart shows very high water usage for this STR, with 1,004 cf in June, 1,949 cf in July and 1,389 cf in August. The Planning Commission requested a building inspection report for this property, due to concerns about the second kitchen downstairs, but we are not aware that a building inspection report was ever submitted to the Planning Commission. **(See Tab 5 for information on Fisherman's Escape.)**

Trinidad Beach Home on Van Wycke Street: The website advertising this STR says “*This is the downstairs of a very nice split home.*” However, this home was never approved as a duplex with a kitchenette, as it is zoned for a single-family residence. The City is aware there is a long-term rental upstairs and an STR downstairs, but allows it to operate even though no permit was issued to operate as a duplex with two kitchens. In fact, this property was inspected by the building inspector in June of 2016, and he reported that the illegal kitchenette and laundry facilities were removed from the downstairs STR. However, current advertisements for this STR show a kitchenette and laundry facilities still exist in the downstairs unit **(see photo of laundry facilities under Tab 6)**.

The City manager acknowledges in an email to the STR manager that *"The primary issue of concern is that this property, based on zoning and permitting, cannot have two separate units on it."* However, in a later email to the STR manager, he says *"I'm talking with Trever about whether there is a possible path to calling this a 'hosted VDU' within a single family home, rather than duplex."* This is an example of the City manager/planner advocating for and word-smithing regulations to allow STR owners/managers to circumvent regulations.

In addition, this STR is being advertised as 2 bedrooms when it was licensed as one bedroom. This property is also exceeding water limits noted on the Operating Permit for the septic system. The Operating Permit says *"Monthly average may not exceed 1,536 cu. ft."*; however, City records from 2016 indicate this property used an average of 1,655 cu. ft. of water per month. Also, the Operating Permit for this property's septic system appears to be expired. **(See Tab 6 for information on Trinidad Beach Home.)**

Buoy Bell, Harbor Heights and Lighthouse Keeper on Parker Street: The owner of this 4-plex is advertising three apartments as STRs. One of the apartments, Buoy Bell, says *"You can rent just the one 2 bedroom condo or you can add the second two bedroom condo on the same floor, if it is available (it books up for 30 nights separately)."* However, when you go to the website that describes the second condo on the same floor, Harbor Heights, it says *"the minimum night stay for this listing varies."* The advertisement for the Lighthouse Keeper says *"Just became a vacation rental again!"* Despite the City's regulations against more than one STR per parcel, this property owner is blatantly ignoring the regulations. The City manager/planner are aware of this situation, but are not taking any actions to stop the violations. **(See Tab 7 for information on Buoy Bell, Harbor Heights and Lighthouse Keeper.)**

Unpermitted Second Dwellings/Detached Buildings Used as Bedrooms/Failure to Bring Requested Inspections to Planning Commission:

The City has allowed unpermitted second dwellings to operate as full-time STRs in multiple cases. The City has completed inspections with unqualified staff with regards to code violations. Instead of the building inspector performing inspections, the City manager and his assistant are conducting health and safety inspections. In an attempt to resolve complaints in the March 29, 2016 Appeal, at its April 20, 2016 meeting, the Planning Commission voted *"to continue the agenda item until the building inspector provides evidence to validate or refute the allegations in the Appeal."* In spite of these directives and multiple requests by the Chairman of the Planning Commission, this has not happened. **(See Tab 8 for Minutes of the April 20, 2016 Planning Commission meeting.)**

The Planning Commission also directed staff to bring all exceptions relating to parking, septic systems, second units, and other code issues, back to the Planning Commission for review. These directives were given in the summer of 2016 and, at the time of this letter, have not been done. Despite City officials' concerns, the City manager/planner are allowing STR owners/managers to rent unpermitted or illegal second dwellings and use converted garages and detached studios as extra bedrooms for the main STR rental.

Two STRs Per Parcel/Single-Family Homes Converted to Duplexes/Allowing Detached Buildings to be Used as Extra Bedrooms/Two Kitchens:

One of the most common STR problems is STR owners/managers renting out more than one dwelling per parcel even though the Ordinance clearly states *"There shall be no more than one VDU per parcel."* With pressure from STR owners, City staff drafted new language, under proposed Ordinance 2015-01, that says *"There shall be no more than one VDU per parcel, except that on lots with three or more legally established dwelling units, the number of VDUs may not exceed seventy"*

five percent (75%) of the total number of dwelling units.” The Planning Commission voted at its May 20, 2015 meeting *“to recommend to the City Council that the proposed amendment to the VDU ordinance **not** be pursued at this time [...].”* This is another example of the rigorous advocacy undertaken by the City manager/planner to accommodate the requests of STR owners/managers. **(See Tab 9 for Draft Ordinance 2015-01 and May 20, 2015 Minutes of the Planning Commission meeting showing 4-0 vote.)**

At the City Council's November 10, 2015 meeting, four Councilmembers voted *“to communicate to the Planning Commission that the intent of one VDU per parcel is to clearly limit a VDU to a single detached legal dwelling unit, and that any other legal dwelling unit on the parcel could not be part of, or operated together with, the single permitted VDU in any way. Nor could they be a separate VDU.”* **(See Tab 10 for November 10, 2015 Agenda Item for City Council meeting and Minutes of meeting.)**

Contrary to direction from the Planning Commission and City Council, City staff continue to allow STR owners to violate the one STR per parcel rule and push for justifications that would allow more than one STR to be rented on one parcel. The debate around the meaning of one STR per parcel hinged on ridiculous. City staff came up with a convoluted idea that if the three apartments in the 4-plex were rented by one party, that would qualify as one STR per parcel because they are in the same building, which is one structure. We do not think this was the intention of the Coastal Commission, when it certified City Ordinance 2014-01, that STR owners/managers could rent out several STRs in one building and call it one VDU.

The City manager/planner are also allowing second kitchens or kitchenettes in single-family homes. Second kitchens allow property owners to convert single-family homes into duplexes, which contributes to further crowding of the property, parking overages, high-water use, and over-taxing septic systems. Several properties have second kitchens (i.e., Fisherman's Escape and Trinidad Beach Home), but the City manager/planner are granting renewals to these properties anyway. In fact, the City planner has deleted language prohibiting second kitchens from the Amendment to the original Ordinance so STRs with second kitchens would conform to City regulations once the Coastal Commission certifies the Amendment.

Lack of Enforcement/Oversight of STRs/Impacts to Community Character/Survey/Petition:

Many STRs are operating with occupancies of 6, 8, 10 and 12 (and also allow additional children and guests, up to a maximum of 20 people). No one is monitoring the occupancy that is advertised online or during tourist stays. Neighbors cannot differentiate between occupants or visitors, creating overages that are unenforceable. Allowing up to 20 people on the property at one time contributes to many of the problems associated with STRs.

Back in the Spring of 2015, the City conducted a survey about community goals, and two of the top comments (out of 14 categories) were to *“increase live-in: vacation ratio,”* and *“moratorium on vacation rentals and phase out—decide on limit.”* **(See Tab 11 for Spring 2015 Community Goals Survey.)**

Many residents feel large numbers of year-round STRs, with two-night minimums, are impacting the functioning of our town. STRs reduce housing for people that would like to live and work here; they also help to drive up housing costs by reducing housing stock. The “Airbnb effect” has emptied many homes that had long-term tenants just a few years ago. Housing that once supported a variety of income levels and age groups is now dedicated to year-round visitor services. A few years ago, Ocean Avenue had no STRs, but now there are five licensed STRs. This has hollowed out our neighborhoods that now have a small and limited number of neighbors to help each other. STRs

have also contributed to shortages of volunteers for public office, community organizations and the Trinidad Volunteer Fire Department.

Back in February 2016, Saving Trinidad Neighborhoods (STN) collected sixty seven (67) signatures in a few weeks on a Petition to ban STRs in residential neighborhoods. This shows strong public support for controls on non-owner-occupied STRs in Trinidad's residential neighborhoods. **(See Tab 12 for Petition.)**

Phase-out of STRs/CAPS/Requiring CDPs/Excessive Water Usage:

Saving Trinidad Neighborhoods (STN) is aware of the Coastal Commission's current stance that STRs should be allowed in residential zones. However, we feel STRs are better suited to commercial and planned development zones. We would like to see full-time STRs, operating in residential zones, phased out and replaced with a concept we have termed "*Primary Resident Only Rentals*" (PRORs). We envision a system in which everyone would be allowed to rent out their home for a maximum of 90 days per year, any time during the year.

Placing caps on STRs creates an unfair situation where property owners that live next to STRs cannot have one of their own once the cap has been met. Proposed caps would also limit the option for any property owner to have an STR. We feel PRORs would be more equitable, provide visitor services and relief to neighbors, reduce enforcement problems, and allow people to live, work and volunteer in Trinidad.

In a May 31, 2016 email conversation between Kathleen Lake and Jim Baskin of the local Coastal Commission office, Mr. Baskin stated that "*The Commission has determined that if five or more rooms in a home are steadily rented to transients, it is clear that a change in the intensity of use has occurred...*" STN absolutely agrees that the larger STRs—those properties that have 3, 4 or 5 bedrooms—increase the intensity of use of the property. When properties are accommodating 8 to 20 people on a regular basis, this strains the coastal environment and impacts our neighborhoods and the character of our community. **(See Tab 13 for emails between Kathleen Lake and Jim Baskin.)**

To get a sense of the impacts that large STRs have on natural resources, it helps to look at the 2016 City's water usage chart. Some STRs are using exorbitant amounts of water in sensitive environments, such as near bluffs and streams. When properties are packed with guests and visitors, day in and day out, this creates overcrowding of properties, removes parking for residents and day-use visitors, creates congestion, and puts stress on septic systems and water conservation efforts. **(See Tab 14 for 2016 City Water Chart.)**

Average Family Size in Trinidad is 2.64 People/Failure to Implement Regulations/Larger STRs Need CDPs/Amendment to VDU Ordinance:

As mentioned above, many STRs in Trinidad typically sleep 6 to 12 people. Add in the allowable number of visitors, and that means many STRs can accommodate between 12 and 20 people. The Wikipedia website says the 2010 United States Census reported Trinidad had an average family size of 2.64 persons (https://en.wikipedia.org/wiki/Trinidad,_California#2010_Census_data).

When you consider the typical household in Trinidad is less than 3 people, it becomes abundantly clear that STRs that sleep 6, 8, 10, and 12 people, including visitors (up to a maximum of 20 people) are changing the intensity of use and density of Trinidad's residential neighborhoods and drastically altering the character of the community.

We feel the logical next step to properly regulate the STR industry in Trinidad is to require that the larger STRs (3, 4, 5 and more bedrooms) obtain a CDP. This would allow the public to participate in the permitting process and be informed about the requirements and conditions for specific STRs and whether or not they are appropriate candidates for exceptions and/or grandfather status. We feel this would benefit residents and other concerned public members that are currently left out of the decision-making process about commercial STRs that are impacting the quality of their lives and character of their neighborhoods.

The reason larger STRs should have CDPs is that the City is failing to fairly implement the regulations of the Ordinance. If CDPs were required, there would be public review of the requirements for those permits. Records and conditions, or any exceptions or grandfathered allowances for STR properties, would come before the City and public review. The CDP would be a contract with the City that requires it to operate in a way that is legal and compatible with the community.

The City's administrative and enforcement programs for STRs are not functioning. When residents report non-compliant STRs, City staff tell them they are going to investigate and bring the properties into compliance. However, years later, these same non-compliant properties are still in operation. Even after building inspections confirm the violations, City staff are granting renewal licenses for these properties without delay. **(See Tab 15 for 2015-2016 and 2016-2017 STR Renewal Lists.)**

The above problems with STRs are the tip of the iceberg. We have also included numerous other non-compliant STRs for your review. If you read the cover sheet for each property, you will see the myriad of problems and impacts that STRs are having on our community. **(See Tab 16 for other STRs with compliance problems.)**

We respectfully ask CCC staff to give careful consideration to our letter and the information contained in the binder, which to the best of our knowledge is accurate and up to date. As the governing body that is involved in certifying the City's Ordinances, we would like your agency to carefully review the manner in which the City is regulating STRs. We feel we have demonstrated, with the immense volume of materials included in the binder, that the City is failing to enforce Ordinance regulations to the detriment of residents, the community and our coastal resources (as per Chapter 3 of the Coastal Act) and that, due to this failure, the CCC must take a more active role in the policies and governance of STRs in Trinidad.

Sincerely,

Kathleen Lake,
Representing Saving Trinidad Neighborhoods
on behalf of the following persons:

Tom Davies of Trinidad
Pat Morales of Trinidad
Adora King of Trinidad
Leslie Farrar of Trinidad
Alan Grau of Trinidad
Kimberly Tays of Arcata
Stan Binnie of Arcata

Merrill, Bob@Coastal

From: Kimberly Tays <[REDACTED]>
Sent: Wednesday, April 05, 2017 11:32 PM
To: Merrill, Bob@Coastal
Subject: City of Trinidad's LCP Amendment App. No. LCP-1-TRN-16-0065-1

Follow Up Flag: Flag for follow up
Flag Status: Flagged

Hi Bob,

I understand that the California Coastal Commission may be voting on the above-referenced LCP Amendment in June re: Trinidad's request to amend its regulations for short-term rentals (STRs).

I am sure you have read the recent articles in the Times-Standard regarding the Memorial Lighthouse bluff slipping, in addition to articles regarding the bluff slumping below the Van Wycke Trail. I know that recent heavy rains have contributed to these bluff problems, but I also feel that the high number of STRs (and their high water usage) is not helping the situation.

Due to the ocean views, many STRs (including the B&B) are located along Edwards Street. Under the existing Ordinance 2014-01, STRs are allowed "an average daily consumption of 150 gallons per bedroom (7,324 cubic feet per year per bedroom) with a 30% allowance for landscaping above the design flow." During the time my husband and I lived in Trinidad (2003-2014), we used, on average, 250 cf of water per month (for both of us). In talking to my many friends in Trinidad, I learned they use around 300-350 cf of water per month (that is for 2 people, too). I do not, personally, know anyone in Trinidad that uses the amount of water that is currently allowed under the existing Ordinance (or that would be allowed under proposed Ordinance 2016-03). Most of my Trinidad friends do not water their lawns, either, which means their water usage is that much lower than STRs that are allowed a "30% allowance for landscaping above the design flow." Due to the sensitivity of Trinidad's coastal bluff environment, STRs should not be allowed to use anymore water than full-time residents, especially when the geologic reports for Trinidad have consistently mentioned high water tables and over-saturation as serious contributors to bluff instability.

Due to my above concerns, I am asking your office to please take a closer look at the amount of water that STRs would be allowed to use under proposed Ordinance 2016-03, as I believe such high water usage, month after month and year after year, coupled with above-average rainfall, could lead to catastrophic bluff failures in Trinidad.

Thank you for considering my comments and concerns re: this very important issue.

Kimberly Tays
P.O. Box 5047
Arcata, CA 95518

Mr. Robert Merrill
North Coast District Manager
California Coastal Commission
1385 Eighth Street, Suite 130
Arcata, CA 95521

February 27, 2017

RECEIVED

ITEM NO: Th9b

FEB 27 2017

CALIFORNIA
COASTAL COMMISSION
NORTH COAST DISTRICT

Dear Mr. Merrill,

This is concerning Trinidad, California's LCP NO. LCP-1-TRN-16-0065-1.

I think the California Coastal Commission should take the time that is needed to investigate this flawed Amendment concerning STRs/VDUs in the City of Trinidad, CA.

I live and own my home at 231 Parker Creek Drive in Trinidad. I am next door to the VDU PARKER CREEK and directly across my one lane gravel road from the notorious VDU PALOMA.

STRs/VDUs should be phased out of the residential neighborhoods in Trinidad and relegated to lots zoned for business use. These VDUs are at maximum capacity and usually exceeding it when they are rented. The septic systems on these small city lots were not designed for commercial use. The Cities water system was not built to supply so many commercial business's.

Our small streets and limited parking were not designed for the many "hotel" like VDU business's that have taken over our City.

The amount of traffic from the renters and the many support vehicles for each VDU is truly incredible.

The City has no enforcement to control the rampant building code violations. The city lacks the ability to check on each VDU business license holder for business insurance. Business insurance, not homeowners insurance, is needed even if the VDU is not active.

This leaves the permanent residents as the De facto law enforcement agency which exposes us to retaliation from the STR/VDU industry. (already taking place)

The CCC should look into conflict of interest with some of Trinidad's employees, council members and planning commission. Are some of these people VDU license holders or have family and friends employed by the VDU industry?

Trinidad is a residential community which welcomes tourist with open arms. Tourist will be here without STRs/VDUs in the city. I would argue it would be a better experience for tourist without the leach like VDU/STR industry controlling our city.

Sincerely

Jacques J Beaupre /
P O Box 1177
Trinidad, CA 95570

Th9b-1

January 20, 2017

Dear Coastal Commission Staffers

There has been a group of residents of the City of Trinidad who have been attending the Planning Commission and City Council meetings during the amendment process for its Short Term Rental (STR) ordinance. We feel that our voices have not been heard in the process and this ordinance poses significant degradation to the environment and our quality of life. Letters, petitions and public comments have been given to the Planning Commission and the City Council. We have voiced all of the concerns on multiple occasions that are being written about in this letter and other documents being submitted to you.

I would like to bring to your attention to the Areas of Special Biological Significance (ASBS) which Trinidad is part of. Here is part of the text for the Trinidad Head segment from the website: NOTE in the second paragraph that key pollution threats include septic tanks.

"The 'Trinidad Head' Area of Special Biological Significance (ASBS) runs approximately two miles near Trinidad Bay in the small city of Trinidad. Rural and urban watersheds discharge here. Trinidad Bay has seasonal marina facilities (i.e., a mooring field, vessel haul-out/launch facilities, and pier facilities), and Humboldt State University Marine Lab is located near the headlands. There is a historic lighthouse.

Key pollution threats include septic tanks, year-round commercial fishing activities and sediment from timber harvesting.

Harbor seals and seabirds are plentiful. The ASBS is bordered by an emergent coastline of hard rock which becomes visible as the sandstone and mudstone are worn away by wind and waves."

Link: http://www.swrcb.ca.gov/water_issues/programs/ocean/asbs_map.shtml

I would like to point out that there are numerous visitor accommodations located in the immediate Trinidad area ranging from Patrick's Point State Park, including inns, motels and RV parks along Patrick's Point Drive. Many of the STRs advertised are not "low cost" and are being promoted as luxury accommodations.

The impact of STRs on the small city of Trinidad has been substantial and has divided the community in multiple ways to the point that many residents stay silent in opposition due to friendships with neighbors prior to the STR ordinance. City staff is overburdened with the process of renewals to the point that the very checks and balances specifically listed in the ordinance are not being followed. Requests for information on STRs with potential violations take much too long being acknowledged or responded to. Repeated requests for information has become routine. Managing the STR ordinance has become onerous for city staff to the point the planner complained that she didn't have time to take care of other business. Public record requests showed that many meetings between property managers, the city planner, and/or city manager occurred to request exceptions to the existing ordinance requirements. The residents of Trinidad who are not in the business of STRs feel that they are not being treated equally and have observed that the municipal codes that have been in place are not being upheld.

Text comments pertaining to the ordinance amendment:

17.56.190(6.26).E Application Requirements

1. Initial application

RECEIVED

JAN 23 2017

**CALIFORNIA
COASTAL COMMISSION
NORTH COAST DISTRICT**

There may be more than one STR operating under the same license. It has been brought to the attention of city staff.

3. STR License renewals

We think that there should be an annual inspection to go along with the renewal process to verify that no changes have been made since the last license was permitted. Trinidad has a history of illegal, unpermitted construction.

17.56.190(6.26).F Maximum number of short term rentals

These numbers were arbitrary and based on fiscal income for the City. Compared to other coastal communities, the percentage of housing stock allowed for STR's is MUCH higher than any other community we have researched. We think that this ordinance violates the City's Municipal Code. We also have grave concerns that the RV parks are now being listed as "affordable housing".

17.56.190(6.26).G Location

We feel that the many exceptions that are already granted to existing STR's have not been processed through the Planning Commission or City Council but have been granted by City contracted staff.

17.56.190(6.26).M STR standards

The City does not have an enforcement officer. We have been told that it is the resident's word against the property managers. This is not reasonable for residents who suffer continuous disruption of holiday makers 365 days a year.

3. Number of occupants

The system for determining how many people are allowed in the STR is not enforceable. Who is going to count the "plus 2"? This needs to be deleted.

4. Visitors

20 people at a STR is too many. This causes overcrowding of the streets with cars, with noise, with overuse of water, extra stress on the septic systems. The 20 person limit gives the impression that Trinidad is a party town with no full time police. Currently there is no police other than the county sheriff department on call.

6. Off-street parking

There are numerous parking exceptions that have been granted over time that are impacting at least two streets in Trinidad. The reason some of them were granted was due to the fact that garages were converted into living spaces, some of which are being used as STR's. These exceptions have seriously endangered the pedestrians walking in town and have negatively affected residents who have difficulty backing out of their driveways.

7. Water use

We have not seen evidence that city staff is actively reviewing and enforcing water usage and what amount is considered "standard". The language regarding 30% increased allowance for landscaping is not enforceable and has not been shown to be used for landscaping. This was brought to the attention of the Planning Commission in written and public comment without a response. One argument put forth by the city planner is that STRs have "formal landscaping" which requires more water. Our personal observation is that these landscapes are established and are not being irrigated. We see this as a loophole to use more water for household uses such as showers, dishwashers, washing machines and the like. The water documents should show STR use only and what months the quantities are being utilized. Septic systems are not operating at peak performance if they are overloaded with water use in concentrated periods. The City handout on the OWTS has tips to care for your septic system. <http://www.trinidad.ca.gov/documents-library/category/2-onsite-wastewater-treatment-system-owts-mangagment-program.html> In that brochure it states: "Do use your property and septic system with how it was designed. Septic systems are designed based on the number of living units and bedrooms in each unit. This assumes a certain number of people and water usage. The more strain you put on your system, the more likely it is to cause you and our community problems." There are other tips listed in the brochure, but one cannot expect renters to practice water conservation, spread out loads of laundry, etc. as recommended.

The city is reliant on a limited water source which is not inexhaustible. Overloaded septic systems have the ability to erode coastal bluffs and headlands and to affect the Area of Special Biological Significance mentioned earlier.

The paragraph regarding number of bedrooms based on the design of the septic system is confusing.

The annual water usage adaptive measures should include decreasing the allowable number of guests.

8. Septic system

Some of the septic systems being utilized with STR's are very old and though have mostly been inspected and passed at this time, they were built for residential NOT commercial use.

12. Traffic

There are significant traffic problems already in existence with the parking exceptions already granted. During the annual Trinidad Fish Festival, for example, the main street was closed and traffic was being routed down one of the impacted street that have many STR's. It was a traffic jam due to all of the STR rentals cars parked on the street. This was very unsafe for pedestrians.

Thank you for your consideration.

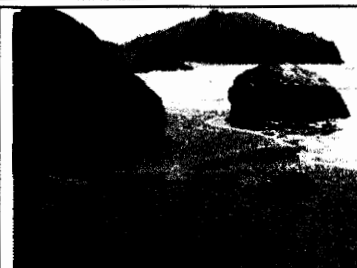


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DESCRIPTION

This CCA watershed flows into the 'Trinidad Head' Area of Special Biological Significance (ASBS), an approximately 2-mile long ASBS near Trinidad Bay in the small city of Trinidad. This CCA encompasses both rural and urban watersheds. Trinidad Bay has seasonal marina facilities (i.e., a mooring field, vessel haul-out/launch facilities, and pier facilities), and Humboldt State University Marine Lab is located near the headlands.

Residences and commercial structures in Trinidad are served by septic systems. A fish cleaning station on the pier is a source of fish wastes; waste seawater from the marine lab, and a city storm drain, discharge directly into the SWQPA. Numerous seeps, possibly contaminated from septic tank wastes, also flow from the coastal bluffs into the SWQPA. Bacteria and nutrients from these sources are Nonpoint Source (NPS) pollutants of concern in this watershed. Sediment pollution from timber harvesting is also a NPS issue, as the major land use in the watershed is silviculture.



Trinidad Head

(Photo courtesy State Water Resources Control Board).

For more photos, visit the California Coastal Records Project:
www.californiacoastline.org

REASON FOR CCA IDENTIFICATION

This watershed flows into the 'Trinidad Head' Area of Special Biological Significance (ASBS), which is a State Water Quality Protection Area (SWQPA).

POLLUTED RUNOFF CONDITIONS

Selected Coastal Zone Waterbodies	<u>Top 5 Runoff Pollutants of Concern¹</u>					Efforts to Address Pollutants (See next page)
	<u>Bacteria</u>	<u>Nutrients</u>	<u>Sediment</u>	<u>?</u>	<u>?</u>	
Trinidad Bay ▲	▲	▲	▲			
Mill Creek ■	■	■	■			
McConnahus Mill Creek • (south of SWQPA)	•	•	•			
Potential Sources of Pollutants in Coastal Waterbodies						
Agriculture						
Forestry (Silviculture)			▲ ■ •			b, e
Urban Areas						a, b, c, d
➤ Urban Runoff/Storm Sewers	▲ ■	▲ ■ •	▲ ■ •			a, b, d
➤ Septic Systems	▲ ■ •	▲ ■ •				a, b
Marinas & Boating	▲	▲				a, b
Hydromodification			■ •			b
Wetlands & Riparian Areas						b, c

¹Information on bacteria, nutrients, and sediment as pollutants of concern is from the North Coast Regional Water Quality Control Board.

Trinidad Head CCA

MAJOR EFFORTS TO IMPLEMENT NPS MANAGEMENT MEASURES

a)	Trinidad Onsite Wastewater Treatment System Management Program (2004)	http://www.trinidad.ca.gov/geninfo/owts.cfm		
City of Trinidad		Bob Brown	(707) 445-2433	bob@streamlineplanning.net
➤ Project to develop a wastewater management program for the City, including assessment and inventory for all septic systems, procedures for monitoring and maintenance, and updating permit standards and management regulations.				
b)	Trinidad Area of Special Biological Significance Partnership (2005)	http://www.coastal.ca.gov/nps/Web/cca_pp_ncoast.htm		
City of Trinidad		Chi-Wei Lin	(707) 677-9010	chiweilin@cox.net
➤ A collaborative effort led by the City of Trinidad, funded by an Integrated Coastal Watershed Management planning grant, to develop an action plan to reduce nonpoint source pollution from discharges and surrounding watersheds.				
c)	Environmental Education by Cascade Learning (1999)			
Trinidad Rancheria		Greg Nesty	(707) 677-0211	greg@trinidadrancheria.com
➤ Partnership with Humboldt State University, Trinidad School District, and North Coast Children's Services; environmental education program for junior high school students, who in turn teach lessons to elementary students.				
d)	Center for integrative Coastal Observation, Research, and Education (CICORE)	http://cicore.humboldt.edu/		
Humboldt State University		Frank Shaughnessy	(707) 826-4133	fjs3@humboldt.edu
➤ CICORE is part of NOAA Coastal Observation Technology System. Water quality monitoring station at Trinidad Pier records temperature, salinity, dissolved oxygen, pH, turbidity, chlorophyll, and water depth every 15 minutes.				
e)	Sustainable Forestry Initiative Program (SFI)	http://www.greendiamond.com/		
Green Diamond Resource Company		Neal Ewald	(707) 688-4400	
➤ All of Green Diamond's forestlands are managed in compliance with SFI program, to support a variety of natural resources, including water quality and wildlife habitat and areas of special biological, geological, or historical value.				

REGULATORY/PLANNING JURISDICTIONS

➤ City of Trinidad	http://www.trinidad.ca.gov/	Chi-Wei Lin	(707) 677-9010	chiweilin@cox.net
➤ Trinidad City Planner, Streamline Planning Consultants	http://www.streamlineplanning.net/	Bob Brown	(707) 822-5785	bob@streamlineplanning.net
➤ Trinidad City Engineer, Winzler & Kelly Consulting Engineers	http://www.w-and-k.com/	Steve Allen	(707) 443-8326	steveallen@w-and-k.com
➤ Trinidad Rancheria	http://www.trinidad-rancheria.org/	Greg Nesty	(707) 677-0211	greg@trinidadrancheria.com
➤ Humboldt State University, Telonicher Marine Lab	http://www.humboldt.edu/~marinelb/	Sean Craig	(707) 826-3656	sfc4@humboldt.edu
➤ Westhaven Community Services District		Richard Swisher	(707) 677-0798	
➤ Humboldt County, Planning & Building Dept.	http://www.co.humboldt.ca.us/	Tom Hofweber	(707) 268-3738	thofweber@co.humboldt.ca.us
➤ Humboldt County, Public Works Dept.	http://www.co.humboldt.ca.us/	Ann Glubczynski	(707) 268-2687	Ann.Glubczynski@co.humboldt.ca.us

Trinidad Head CCA

➤ Humboldt County, Community Development Dept.	http://www.co.humboldt.ca.us/	Kirk Girard	(707) 268-3735	kgirard@co.humboldt.ca.us
➤ Calif. State Parks, Trinidad State Beach	http://www.humboldtredwoods.org/ncrdcontact.htm	Patrick Vaughan	(707) 445-6547	pvaug@parks.ca.gov
➤ Calif. Coastal Commission, Water Quality Unit	http://www.coastal.ca.gov/nps/npsndx.html	Vanessa Metz	(707) 445-7873	vmetz@coastal.ca.gov
➤ North Coast Regional Water Quality Control Board, NPS Complaint Response	http://www.waterboards.ca.gov/northcoast/	Diana Henrioulle-Henry	(707) 576-2350	dhenrioulle-henry@waterboards.ca.gov
➤ State Water Resources Control Board, ASBSs	http://www.swrcb.ca.gov/plnspols/oplans/asbs.html	Connie Anderson	(916) 341-5280	csanderson@waterboards.ca.gov
➤ California Coastal Conservancy	http://www.coastalconservancy.ca.gov/	Su Corbaley	(510) 286-6767	scorbaley@scc.ca.gov
➤ Calif. Dept. of Fish & Game, Marine Region	http://www.dfg.ca.gov/	Vicki Frey	(707) 445-7830	vfrey@dfg.ca.gov
➤ Caltrans, Stormwater Management	http://www.dot.ca.gov/hq/env/stormwater/	Alex Arevalo	(707) 445-6600	Alex_Arevalo@dot.ca.gov